

Plan E Inspector's Questions
11 June 2010

Matters of Clarification

Plan E is clearly an Area Action Plan, and the LDS calls the document the Epsom Town Centre Area Action Plan. There is no mention of this description on the front cover of the document. Please clarify and confirm that the description for the plan is "Plan E - Epsom Town Centre Area Action Plan".

We confirm that Plan E is an Area Action Plan for Epsom Town Centre. We will ensure that this is clear by adding this to the front page of the plan. We suggest that this be introduced as a minor amendment.

The submitted proposals map (B) shows the Town Centre boundary, but the Utilities site allocation and public realm improvements north of the Station extend outside the town centre boundary. Please clarify the extent of the plan area, including on an OS based map. Has this boundary been consistently followed throughout the plan preparation?

An OS map showing the proposed town centre boundary has been attached for clarity. This can also be seen on Map 8 of Plan E. The Inspector is correct that these two areas are not within the defined (proposed) Town Centre boundary.

The extent of the Town Centre boundary has been carefully re-examined throughout the plan making process. At the issues and options stage three options were considered. These identified the extent of the commercial activity in the town centre, with one option extending to include Rosebery Park and Mounthill Gardens and the other extending to including the University. Through consultation, it was decided that the option that did not include the Parks or the University was the most appropriate as it accurately reflected the extent of the Town Centre in planning policy terms. The Council has consistently followed this boundary option during the subsequent plan preparation.

The Linton's Lane site had been excluded from the proposed Town Centre boundary on the grounds that the site functions, and is accessed via, the predominantly residential area (Linton's Lane) to its immediate south, rather than the Town Centre uses to the west/ south west. It is highly probable that any future redevelopment of this site will be residential in nature. As the boundary has been drawn to include mainly commercial activity in the Town Centre, it is considered inappropriate to include the Linton's Site.

However, the site has been included as part of the wider Utilities strategic opportunity site in the interests of achieving comprehensive redevelopment of the whole site. There would be numerous benefits in this approach, for example achieving improved pedestrian and cycle access into and across the site.

The soft landscaping/ planting improvements identified on the public realm map (10) run along the edge of the Town Centre boundary. Although it is not actually within the boundary, it is considered important to act as a buffer between the railway station (inside the Town Centre) and the residential street.

Matters where further information is required

The inspector notes the schedule of changes that have been submitted with the Plan. Do you intend to publish any further changes at this stage? Does the Council intend to submit any statements of common ground or reach agreement with any representors?

The Council has put forward some potential further changes in response to GOSE's comments that the Inspector may wish to consider.

The Council is considering areas where common ground could be met with respondents on some matters, particularly where their comments/ objections have been met through the recent granting of planning permission. An example of this is Epsom Station that has gained planning permission since the final consultation on the Plan. Equally, the Council believes that there are general areas of Plan E policy where common ground could be established. Recent progress during negotiations on a number of development proposals suggest that the Council will reach agreement with a number of respondents on the proposed building height policy. The Council do not propose any changes in association with establishing common ground.

Please submit responses to all the key concerns and other comments submitted by GOSE on 11 March 2010.

The Council has prepared comprehensive responses to GOSE's comments. These can be found in supporting Document 1.

The Inspector questions the deliverability of the totality of the Utilities site (E15) as identified in the AAP in the light of the SHLAA findings and representations on the AAP. The Inspector needs to be satisfied on deliverability. She would welcome the submission of any information that the Council may have that demonstrates that the development proposed in E15 is achievable within the Plan period. If the Council seeks to rely on the likelihood that parts of the allocation could be developed independently, what contingency plans would there be if the totality of the allocation does not materialise?

This question has been answered as part of the response to GOSE's questions in supporting Document 1.

The Council has examined the deliverability and developability of the mix of uses proposed for the Utilities strategic opportunity site. The Council is satisfied that its approach towards this site is sound. The Council has produced a viability assessment of the proposed mix of uses, which is included as part of its response to the GOSE questions.

The Council acknowledges that this site has a number of issues that may influence deliverability. However, the Council believes that its comprehensive approach, including the formation of a landowner interest group, production of a development brief and exploration of alternative site options (for the on-site gas utility) through its Delivery DPD process is a proportionate response to the challenge. The Inspector is asked to note that the Council's Delivery DPD will examine options for future residential and employment growth across the Borough, and as such may provide

alternative contingency site options should the totality of the Utilities site be delayed beyond the Plan period.

The Inspector notes that a Parking Strategy is to be prepared by 2012, but she questions the allocation of site E14 which includes large areas of public car parking for development with the number of parking spaces in that allocation specified without having first formulated a parking strategy for the Town Centre. She queries policy E16.6 for a similar reason.

The Council has prepared a parking position paper, which contains information on parking provision, usage and enforcement in the Town Centre along with progress in the production of the Council's Parking Strategy.

The Council recognises that it would have been desirable to have produced the Parking Strategy alongside Plan E however, this was not achievable. It is noted that the production of the Borough wide Parking Strategy is dependent upon the completion of the Countywide Strategy, which is currently unpublished. The Council has sought to efficiently manage the production of key corporate policy and strategy documents. It believes that the early production of Plan E, ahead of Borough wide Parking Strategy will not prejudice its content. The Council believes that Plan E is sufficiently flexible to assist in its future delivery. The supporting evidence and objectives for the Town Centre component of the Borough wide Parking Strategy are already known and have been utilised during the preparation of Plan E. Equally the Council's corporate approach towards the preparation of the Parking strategy will ensure that planning policy and parking strategy are co-ordinated with one another.

The Council is satisfied that the broad levels of parking provision in the Town Centre are adequate, although it is recognised that improvements could be made to ensure maximum efficiency is made of this resource. The Council's evidence shows that existing public parking provision operates well within its capacity

The Inspector has also picked up on statements in the text of the AAP about parking - EG Page 21 under access, Paragraph 3.26 and Paragraph 5.34 which require justification.

The various statements referred to by the Inspector relate to the levels of parking provision across the Town Centre and how their future management will be improved. As evidence demonstrates that current levels of parking provision operate within capacity the Council considers these statements are justified. The Council has comprehensive raw data that demonstrates that the public provision that it manages is operating well within its capacity. Illustrative data has been extrapolated and included within the parking position paper.

In addition, it is recognised that different car parks perform different functions and the Council is keen to ensure that this is reinforced to meet the needs of the Town Centre. For example the Hook Road car park makes provision for long stay parking, which is on the periphery of the shopping area but closer to the East Street employment area. Making provision for long stay parking will help encourage longer dwell times in the Town Centre, and provide some provision for commuters, which will also boost the economy.

In comparison the Town Hall car park, which is located close to the primary shopping area provides short term parking only. The parking study, referred to in the parking position paper supports this position.

In Paragraph 2.7 there is reference to a study of illegal parking within the Town Centre which has not been supplied. Please provide a copy for the Inspector as part of the evidence base if you wish this to be considered.

The Illegal Parking Study referenced within Plan E is an academic study produced by the lead Surrey County Council Officer responsible for the preparation of the Town Centre PARAMICS traffic modelling. For the purposes of the Plan E examination the Council has provided an extract from the illegal parking study for the Inspector (Supporting Document 3), which contains the relevant data on the impact of illegal parking.

Whilst the Inspector has found various references to parking in background documents, she has found contradictions in what she has read about the adequacy of car parking in the Town Centre. She has little information on the availability and demand for car parking spaces and how any changes to car parking policy would impact on demand and the use of other modes of transport. Also how would proposed new development impact on that?

The parking position paper provides relevant information in response to this question.

The Town Centre is a highly accessible location and it is entirely appropriate for the Council to direct future growth to sites within the area covered by Plan E. This approach is consistent with national policy. There are a range of travel choices available to residents and visitors to the Town Centre. The Council believes that by directing future growth to the Town Centre will help to make sustainable travel modes, such as rail, bus, cycling and walking, viable alternatives to the private motor car – thereby encouraging sustainable travel patterns and habits.

As stated above the Council's evidence shows that existing public parking provision operates well within its capacity

The Inspector notes the conclusion in Paragraph 5.39 of the retail study recommending that the AAP be accompanied by a detailed parking strategy. She has also seen that former proposals for multi-storey car parking and housing on the E14 site were no longer considered appropriate and have been deleted from the Local Plan (Paragraph 13.6.20).

The Council is committed to the production of a Borough wide Parking Strategy and agrees with the recommendations of the retail study. The accompanying parking position paper sets out the details of the Council's emerging Parking Strategy.

Paragraph 13.6.20 refers to a historic proposal set out in the previous 1995 Local Plan. The Council considers the planning policy context has changed. National policy seeks a 'town centre first' approach with an increasing requirement to maximise the use of urban land, particularly that in sustainable locations. The wider Borough wide constraints upon development land supply demand the efficient reuse of existing urban land, which is reflected by the Council's (subsequent) Core Strategy policies. The Council has already indicated that saved local plan Policy MV11 will be superseded by Plan Policy E14.

The Inspector is concerned that in the absence of a parking strategy, the AAP makes proposals with relevance to levels of car parking in the Town Centre without the evidence base to support them. There may however be additional information which you can provide that justifies the policies of the plan. The AAP should have a co-ordinated approach. The Inspector would welcome your views on these matters.

The parking position paper provides information, which assists in the justification of the policies in Plan E.

As stated above, the Council has sought to efficiently manage the production of key corporate policy and strategy documents. It believes that the early production of Plan E, ahead of Borough wide Parking Strategy will not prejudice its content. The Council believes that Plan E is sufficiently flexible to assist in its future delivery. The supporting evidence and objectives for the Town Centre component of the Borough wide Parking Strategy are already known and have been utilised during the preparation of Plan E. Equally the Council's corporate approach towards the preparation of the Parking strategy will ensure that planning policy and parking strategy are co-ordinated with one another.

The Council is satisfied that the broad levels of parking provision in the Town Centre are adequate, although it is recognised that improvements could be made to ensure maximum efficiency is made of this resource. The Council's evidence shows that existing public parking provision operates well within its capacity

In addition she is unclear as to what is proposed regarding parking standards for new development. Please clarify.

The parking standards of new developments will be in line with the current planning policy context. Detailed information on the current and emerging parking standards can be found in the Parking Position Paper.

Please provide any justification that you may have for the allocation of hotel accommodation at the station site in Policy E16.

Recently there have been a number of schemes proposing the development of hotels within the Town Centre. The Council understands that this follows a national trend and may be partially due to the availability of finance for this type of development scheme. Whilst there are two existing hotel chains operating within the Epsom area (at the Epsom Downs Race Course and on the Dorking Road), there is no evidence to suggest that the market is operating at capacity. Anecdotal evidence suggests that outer-London locations with good rail connectivity, such as Epsom, are popular and cost-effective alternatives for business travellers. It is understood that the hotel sector is buoyant and that a number hotel chains are anticipating growth. The Town Centre is the most appropriate location for this type of use.

Planning Permission has recently been permitted for a 64 bed hotel at the Station site (09/00824/FUL).

Map 1

Town Centre Boundary

