

Epsom & Ewell Borough Council
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Introduction

During the first day of the Plan E examination hearing, on Tuesday 21 September 2010, the Inspector heard responses to her questions on Main Matters 1 and 2. Whilst hearing responses to Main Matter 1 (Items 7 and 8) and Main Matter 2 (Item 1) the Inspector was asked, by a participant representing the University of Creative Arts (UCA) to take note of a number specific town centre area action plans (AAPs), which had recently been found sound. These comprised AAPs for Bedford, Chelmsford, Kingston upon Thames, Plymouth, Reading and Wakefield. The agent acting for the UCA suggested that these AAPs were relevant to the discussion as they all incorporated further and/or higher education institutions within their plan area boundary (in contrast to Plan E, which does not include the UCA).

The following paper provides the examination with the Council's observation of how the six referenced AAPs incorporate further and/ or higher education institutions within their plan area boundaries. It also sets out the Council's conclusions. A separate analysis of each AAP is included as appendices to the paper.

Observations

The Council highlights the following points:

- The college/ university sites included within five of the town/city centre AAP plan area boundaries are either contiguous with the town centres' built form, or are immediately adjacent to the core town centre area. Examples of where the local college/ university are identified as being contiguous with the town centre (and other town centre uses) include Bedford, Chelmsford and Wakefield. The University of Plymouth and the Plymouth College of Art are both immediately adjacent to the core town centre area. The only exception to this position is the Reading AAP, where the Council notes that the university/ college does not fall within the Central Core and is on the periphery of the town centre. The Inspector is asked to note that the Reading AAP covers a far greater area in comparison to Epsom and that the policy relating to the university is site specific. The site itself is not contiguous with any other main town centre related uses/ designation.

The Council also notes two cases where the respective local planning authority has been selective in their inclusion of adjoining uses within the plan area boundary. Notably, the Plymouth City Centre AAP which excludes a number of adjoining areas that includes commercial, open space and community uses (including the city's cathedral) that could have logically been included within a wider plan area boundary. Equally, the Central Wakefield AAP excludes a number of adjoining town centre type uses (including a college) from its plan area boundary.

- The town/city centres covered in the six AAPs are in all cases significantly larger than Epsom Town Centre. This is in terms of their size, their position in the settlement/ retail/ commercial hierarchy and their urban form. The Council has already identified that the Reading AAP covers a notably wider area than the other five. It is also noteworthy that both Chelmsford and Plymouth lie towards the top of their regional town/city hierarchy; Chelmsford declaring their status as the capital of Essex and Plymouth drawing comparisons with Liverpool, Manchester and Southampton. In contrast, Plan E seeks to reflect its status as a secondary regional centre.

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As a consequence, the Council notes that the resulting townscapes/ development patterns found within these larger settlements are noticeably different from Epsom. For example, a number of the centres have their core areas either wholly (Plymouth) or partially (Chelmsford and Reading) enveloped by gyratory highway networks. The resulting circular development pattern is more conducive to accommodating selective extensions that adjoin these highway networks to the plan area boundary. The Trinity Business Park south of Wakefield Town Centre is an example of such an approach. In contrast, Epsom Town Centre follows a linear development pattern, where the core shopping/ commercial area(s) is surrounded by predominantly domestic scale residential uses, which (in the case of the UCA) separate potentially compatible but removed town centre uses (such as Epsom Hospital and the UCA) from the Town Centre.

- The Council notes that in a number of cases; for example Chelmsford, Kingston, Reading and Wakefield; the AAPs have included a specific college/ university site because that site is the subject of an advanced redevelopment proposal. As stated above, with the exception of Reading, these redevelopment sites are contiguous with other town centre uses found within the plan area boundaries. Whilst the Council acknowledges that the UCA has its own masterplan for the redevelopment of part of its site, that document has no planning status. As stated previously, the UCA is separated from the Town Centre by the residential area to the south of the Parade.

Conclusions

The Council considers that the responsibility of identifying the unique scope and extent of a town/city centre AAP plan area boundary rests with the local planning authority. Put simply, there is no established model that demands a town centre AAP include certain prescribed uses within its boundary. The six referenced AAPs provide evidence for this; both Plymouth and Wakefield adopt a selective approach towards what is included and excluded from the plan area boundary, whilst in contrast the Reading AAP boundary is significantly more inclusive.

The Council maintains that its approach towards the plan area boundary, which focuses upon the Town Centre's commercial and economic uses, and excludes the surrounding predominantly residential areas, is sound. The Council acknowledges that the UCA, and other outlying uses such as Epsom Hospital, has strong links with Epsom Town Centre and are important uses within the Borough. However, that is not justification for drawing a wider plan area boundary, which would not only include such sites/ uses but also the aforementioned residential areas.

The emerging Delivery Development Plan Document, which will contain site specific allocation and development management policies, provides an appropriate mechanism to plan and manage future growth on these outlying sites.

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Appendix 1
Bedford Town Centre Area Action Plan (2008)

Introduction

Bedford is the county town of Bedfordshire and the administrative centre for the borough of Bedford. The Area Action Plan (AAP) for Bedford Town Centre was adopted in October 2008. The AAP looks towards the expansion of Bedford as a regional centre, enabling it to compete more effectively on economic terms with Milton Keynes, Northampton and Cambridge. Bedford College and University of Bedfordshire are both located within Bedford. The college is within the AAP boundary but the Bedford campus of the University of Bedfordshire falls outside of the boundary.

Analysis

- According to Office of National Statistics population estimates for mid 2009, the urban areas of Bedford and Kempston have a population of 101,380, which is significantly greater than Epsom. The aspirations for urban growth and development also underline this point.
- Bedford College occupies a central location on the southern bank of the River Great Ouse, directly opposite the main historic core of the town.
- Surrounding uses on the southern bank of the river are almost entirely commercial in use. To the immediate west of the college are the offices of Bedfordshire County Council and the South Wing of Bedford Hospital. To the south there are a number of large retail stores and warehouses.
- The riverfront area in which the college and the County Council offices are located is referred to in the AAP as St Mary's Quarter. The concentration of education and administrative uses in this area is cited as key asset and development is encouraged to provide enhanced public space and access to the river. These objectives are set out in Policy TC14 for St Mary's Quarter, which encourages the college and Bedfordshire County Council to bring forward development proposals St Mary's Quarter is one of the 'Key Areas of Change' indicated on the Proposals map.
- Integrating the riverfront with the rest of the town centre forms an integral part of the Vision the AAP sets out for town centre: "*The riverside will be embraced into the town centre with signature buildings, their activities spilling out on to a quayside crowded with rowing boats and canal craft en-route from the Grand Union Canal*".

Policy TC14- St Mary's Quarter

"Land and premises on the south bank of the river will be more closely integrated with the town centre in terms of design aspect and connectivity via the proposed bridges which will provide enhanced pedestrian, cycle and vehicular links. Development proposals in this area will be required to present an active face to St Mary's Gardens, protect and enhance this important river frontage and create a more campus style setting. The potential to incorporate a mini marina to encourage and facilitate river usage will be explored."

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Conclusions

- The scale and character of Bedford is not comparable with a smaller, historic market town like Epsom. The aspirations expressed in the AAP for growth and development in the town centre reinforce this point.
- The enhancement and integration of the riverside area of St Mary's Quarter is a key objective within the long term vision set out in the AAP. These are to be met through redevelopment in St Mary's Quarter.
- The incorporation of Bedford College within the town centre is not surprising given the central location of its campus and the importance attached to the surrounding riverside area for the town's future development.

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Appendix 2
Chelmsford Town Centre Area Action Plan- Anglia Ruskin University

Introduction

Chelmsford is described as the 'capital of Essex' with a population and regional function of a city. Chelmsford is a cathedral town and major employment centre. The Council have identified capacity for new growth in the town centre and the strategy aims to drive development and improvement.

The vision for Chelmsford Town Centre (contained in the AAP) is:

"The dynamic capital of Essex, anchored upon Chelmsford's historic identity as a market town, cathedral city and technological powerhouse, embracing compact urban living, superb shops, leisure and culture, built around neighbourhoods of distinctive character".

East of England Plan

Policy SS3

Chelmsford was classified as a 'Key Centre for Development and Change' in policy SS3 of the East of England Plan. This defined the areas where new development should be concentrated in the region.

Policy E5

It was also classified as a 'Regional centre' alongside Basildon, Cambridge, Colchester, Ipswich, Norwich, Peterborough, Southend and Watford.

There was also a specific 'Chelmsford Key Centre for Development and Change' policy (CH1) which emphasised Chelmsford's potential for change (including housing growth, strengthening the town's role as a sub- regional centre for primary health care and higher education, diversifying the employment base, maximising the re- use of previously developed land and providing for sustainable urban extensions and assisting the development of more sustainable transport systems).

Scope of the plan

The Chelmsford Town Centre Area Action Plan (AAP) was adopted 27 August 2008.

The Area Action Plan (AAP) covers the town centre - an area roughly 1km radius from the Cathedral containing the shopping area, the West End and Moulsham neighbourhoods, Central Park, Anglia Ruskin University Campus and Chelmer Waterside.

The town centre boundary has been drawn to include all of the commercial and institutional activities that relate to the town centre, up to the edge of the residential neighbourhoods surrounding the central area. The northern boundary where the University is located is bounded by an area of green space that is protected by a green wedge policy that existed prior to the AAP's adoption. .

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Anglia Ruskin University

Anglia Ruskin University have two Campuses' within Chelmsford. The AAP states that the University are to relocate from the 'Central campus' to the Rivermead Campus in the northern part of the Town centre. This is in line with a planning brief (2001). There is a current master plan for the new campus which is in the process of being built. This campus is therefore included as a site in the AAP.

Para 21.1 states that 'The University is 'surrounded by industrial and commercial uses important to the town centre economy'. The Campus includes teaching buildings, a student village and associated shopping, related business incubation centre, industry and hotel.

The Campus is included within the 'Rivermead' character area which also includes:

- railway land for development
- a new street frontage at New Street which links the University with the Cathedral and the High Street
- the Rivermead industrial area

Conclusions

Chelmsford is different from Epsom in terms of its position within the region. Epsom was classified as a 'secondary town centre' in the South East Plan whereas Chelmsford was given a higher status in the East of England Plan as a 'regional centre'. Chelmsford's AAP is a strategy to drive development and growth, whereas Epsom's AAP is focused on improving and effectively managing what already exists.

Anglia Ruskin University is contiguous with the adjacent employment areas and other opportunity sites and is not separated from the Town Centre by other uses like the UCA in Epsom is. The Council has chosen to include the employment areas and all opportunity sites within the Area Action Plan Boundary, within the 'Rivermead Character area'.

The University Campus has been allocated to reflect the current master plan that is under construction. In contrast, the UCA's own masterplan does not (currently) offer the same degree of on-site redevelopment, or commitment (in terms of timetable and funding streams).

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Appendix 3
Kingston Town Centre Area Action Plan (K+20)

Introduction

Kingston is an urban centre in southwest London and the principal settlement in the Royal Borough of Kingston Upon Thames. Kingston Town Centre Area Action Plan (K+20), adopted in July 2008, envisages the town as:

“A thriving metropolitan centre serving the needs of its catchment and providing a sustainable and enhanced range of town centre services including: retail, leisure, employment, education and community facilities, as well as new homes and improved job opportunities”.

The area covered by the Area Action Plan (AAP) includes the main retail and commercial centre of the town where these services are concentrated, while excluding the more exclusively residential areas which surround the town centre.

Analysis

- As a major commercial centre serving southwest London and Surrey, the area covered by Kingston town centre is greater than that of Epsom.
- The town contains two further education institutions, Kingston College and Kingston University, the main campus of which is located on Penryhn Road.
- Penryhn Road is a busy main road and a key route into the town centre. Surrounding uses along this road include County Hall and Kingston Crown Court, important town centre uses. Together with the Guildhall buildings to the north, these sites are designated as Character Area 9: Civic and Education, showing the coherence of uses across this area.
- Both the main campus of Kingston University on Penryhn Road and County Hall opposite are designated as Proposal sites/ Potential Redevelopment sites on the proposals map (labelled P15 and P16 on Plan 15: Proposal Sites and Key Areas for Conservation. In addition to redeveloping the outmoded university buildings, Policy P16 aims to secure improvements along the Penryhn Road entrance to the town centre.
- The Vision for the town centre put forward in the AAP makes clear that development on these proposal sites will form an integral part of the long term objectives for the town centre, which explains their incorporation within the AAP boundary: *“High quality new development will maximise the potential of vacant, outmoded and underused sites”.*

Conclusions

- The role of Kingston’s town centre as a commercial centre serving a large catchment area is not analogous to that of Epsom.
- The mix of uses along the upper end of Penryhn Road, as well as the character of the surrounding area is consistent with the broader town centre.
- The presence of two major proposal sites along Penryhn Road (including the university itself) also accounts for the southern extension of the town centre boundary.

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Appendix 4
Plymouth – The City Centre and University Area Action Plan

Introduction

The City Centre and University Area Action Plan (AAP) amplifies the Vision for the area as set out in the Core Strategy. It sets out a detailed planning framework for delivering a sustainable City Centre neighbourhood which is a vibrant and thriving regional destination, which will be the natural destination for people from Devon and Cornwall who want high quality and varied shopping, cultural, leisure and recreational facilities, a unique environment anchored in its heritage, and a top class learning area focused on the University and Plymouth College of Art. The City Centre and University AAP will guide decisions on planning applications and shape development and regeneration opportunities in the City Centre area over the period to 2021 and beyond.

The AAP was adopted by the City Council in April 2010.

Analysis

- The AAP covers a significant area. From the outset the AAP compares Plymouth City Centre, in terms of extent, to Liverpool, Manchester and Southampton.
- The form of the Town Centre is defined by the surrounding (circular) road network, which provides a very hard boundary to the area (it is in most places a dual carriageway).
- The AAP defines a very specific area as a learning and culture district (under Policies CC16 and CC17. These policies specifically cover the University of Plymouth campus, the Plymouth College of Art, Regent Street car park, and Charles Cross Police Station. The area also includes the City Museum and Library, a variety of exhibition spaces and cafes.
- The AAP boundary has been tightly drawn to include the areas covered by Policies CC16 and CC17. Both areas lie to the immediate northeast of the Town Centre core, outside of the area enclosed by the A374.
- Analysis of aerial photography suggests that the character and appearance of the area defined as the learning and cultural is consistent with the adjoining town centre, with which it is contiguous. It is highlighted that significantly smaller scale residential areas to the north of the university and college have been excluded from the AAP boundary.

Conclusions

- Plymouth is different from Epsom in terms of its scale, townscape, urban form and mix of uses. In particular, the town centre's relationship with its inner ring-road and other transport infrastructure help to create a wider, more circular town centre form. In contrast, Epsom, with the A24 as its main artery follows a linear form.
- The scale, concentration and mix of education and cultural uses at a location immediately adjacent to the Town Centre suggests that it is entirely logical for the AAP to incorporate them within its scope. It is noted that there are other potential town centre-type uses within walking distance, such as the railway station, harbour, marina, industrial/ employment area and the Cathedral that are excluded from the AAP boundary. These excluded areas no doubt remain important to the Town Centre but due to their geographic displacement are to be the subject of other policy documents – most notably Sutton Harbour, which will have its own AAP. This approach is entirely consistent with that taken by Plan

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E (in relation to satellite uses outside of Epsom Town Centre), which excludes nearby uses such as the UCA, WS Atkins HQ and Epsom Hospital.

- Plymouth University and Art College are contiguous with the adjacent retail and commercial uses located at the heart of the AAP boundary. These higher education and cultural uses are also entirely contiguous with the Town Centre in terms of their scale, character and appearance.

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Appendix 5
Reading – Reading Central Area Action Plan

Introduction

Reading is designated as a 'regional hub' and is within the top ten of a national ranking of UK centres. The Town Centre is considered to be able to make an immense contribution to meeting the overall vision for Reading, which is set out in the Reading 2020 Vision document and the Borough's Community Strategy. The vision is to establish Reading as the capital of the Thames Valley and as a gateway between the UK, Europe and the world; to provide the highest quality services and facilities for all who live in, work in and visit Reading; and to maintain and improve quality of life for everyone. Significant change in the centre will be vital in taking the centre to this next level. To ensure a comprehensive approach to the levels of development an Area Action Plan has been produced.

The Reading Central Area Action Plan (AAP) was adopted by the Council in January 2009

Analysis

- The AAP covers a significant area. The centre is designated as a 'regional hub' and significant growth / change is expected. The AAP includes 'those areas which will contribute most to meeting the vision for Reading and for the centre in particular, whether they be major opportunity areas, the commercial core of the centre to which overall policies should apply, or the major areas of open space, access to and use of which the AAP seeks to improve.'
- A 'Central Core' is defined on the Proposals Map, which includes around half the area within the AAP boundary. In general, main town centre uses are directed towards the Central Core. The outer areas contain a greater mix of uses including residential areas, warehousing and areas of open space.
- The former Thames Valley University (Reading Campus) is included within the boundary and specific policy is related to this site; Policy RC4n – Thames Valley University, Kings Road 'Continued development to support the role of this site in providing higher and further education and maximising its contribution to the local community'.
- The university does not fall within the Central Core and is on the periphery of the Town Centre. The university is adjoined by mainly residential areas, although there are some commercial sites and development sites nearby.

Conclusions

- Reading AAP covers a far greater area in comparison to Epsom, although a central core / office core is defined which contains the majority of the commercial uses.
- The policy relating to the university is site specific and the site is not contiguous with any other central Town Centre related designation (such as the central core / office core).
- The approach taken is different to Epsom in the sense that the focus is on a wider area, encompassing a wider mix of uses including residential areas.

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Appendix 6
Central Wakefield Area Action Plan

Introduction

The Central Wakefield Area Action Plan (AAP) develops the spatial vision, objectives and overall strategy set out in the Core Strategy (the main overarching document of the LDF) into more detailed policies and proposals relating directly to central Wakefield.

Central Wakefield is a geographical area that covers the whole of the city centre and also residential and employment area immediately beyond the current inner ring road. The city centre is a major shopping and commercial centre of sub regional importance. It has also been identified as the main driver of the district's economy in the Community Strategy (Developing Knowledge Communities).

Preparation of the document has included wide ranging consultation and engagement with the public and interested parties, details of which can be accessed by following the appropriate links below. Briefly, the main stages have been:

- Early community engagement (Autumn/Winter 2004/2005);
- Issues and options consultation (June - July 2005);
- Preferred options consultation (January - February 2007); and
- Submission consultation (May – July 2008).

A senior government planning inspector found the document sound after examining it during 2008/09.

Analysis

- The AAP boundary is extensive and covers a wide area that primarily includes commercial uses with some residential areas (that are enclosed by the ring-road).
- The AAP includes (non-policy) text that specifies the extent of the plan area boundary. This text states that the boundary covers “the whole of the city centre and also inner city residential areas and employment/ industrial areas beyond the inner ring road”. Analysis of the AAP proposal's inset map shows that this does include the Trinity Business Park to the immediate south of the historic town centre. Residential areas adjacent (to the south and southwest) of the Business Park are not included with the Plan Area Boundary. It is noteworthy that Clarence Park, and other open space areas located on the edge of the AAP Boundary are not included within the Town Centre Boundary. It is also noteworthy that other community/ commercial uses that geographically abut the boundary have been excluded – notably Thorne's Park College (to the southwest) and HM Prison Brook Banks which lies to the immediate west of the town centre (and adjoins college buildings, also excluded from the boundary).
- Wakefield College is located at Margaret Street, which lies off Wentworth Street/ Bond Street. The College is to the north of the Town Centre's commercial core and map analysis shows that the College is linked to the town centre by commercial (including retail) and community uses. The College immediately abuts the North Wakefield gyratory system and Emerald Ring road network – both of which directly serve the Town Centre.
- Analysis of aerial photography suggests that the character and appearance of the College is consistent with the adjoining commercial and community uses found

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within the rest of the Town Centre – namely the College buildings are to a civic scale. Analysis indicates that there is no break (in character and appearance of the built form) between the adjoining commercial and civic buildings and the College.

- The AAP specifically identifies the College site for comprehensive redevelopment. The policy states:

“D. Wakefield College (Sandy Walk)

5.97 *This 0.46 hectare site should become available for development when the new college facility is constructed on the Newstead Road site. The site lies close to the city centre and abuts the boundary of St Johns and Wentworth Terrace Conservation Areas. Cliff Hill House, a grade II listed building, lies to the south of the site.*

5.98 *The site is suitable for residential or institutional uses. Densities of between 60 and 70 dwellings per hectare are considered to be appropriate having regard to the character and appearance of the surrounding area although proposals will need to ensure that the character and setting of adjacent historic assets are not adversely affected.*

The above proposal would see the redevelopment of the College within its existing site area. It is understood that the entire redevelopment project has subsequently been put on hold due to the withdrawal of Learning & Skills Council Funding.

- It is noted that with the exception of the site specific allocation, the AAP makes no reference to the role of further/ higher education as a town centre use. The College’s importance to the local economy is briefly noted by the AAP.

Conclusions

- Wakefield is very different from Epsom in terms of its townscape, urban form and mix of uses. In particular, the town centre’s relationship with its inner ring-road and other transport infrastructure help to create a wider, more circular town centre form. In contrast, Epsom, with the A24 as its main artery follows a linear form.
- Wakefield’s AAP boundary has been extended to include a significant industrial/ employment area to its immediate south. However, an alternative planning policy approach could just as easily have excluded this area and allocated it (for employment purposes) within another (site allocations) policy document. It is notable that other uses, including a HM Prison and college, that adjoin the AAP boundary have been excluded.
- Wakefield College is, unlike the UCA, contiguous with other town centre uses (commercial and community uses). The College is not separated from the town centre by other uses, of a non-town centre character and appearance.
- The College has been allocated (in this document) to reflect a specific recent comprehensive redevelopment proposal, which has subsequently been placed in abeyance. In contrast, the UCA campus masterplan does not (currently) offer the same degree of on-site redevelopment, or commitment (in terms of timetable and funding streams).