

Epsom Civic Society's Comments on the Reg 19 Consultation on the Draft Local Plan

To note: all responses confirmed legal compliance and soundness, also confirming that we did not wish to participate in the hearings.

Repetition in some comments is a consequence of the layout of the form.

Comment 263

Paragraph 1.20 - resourcing of the Local Plan: it would be helpful to have timetables for the production of a Borough-wide Design Code and area-by-area Design Guides.

Comment 264

Paragraph 3.20: where is Figure 3.1?

Comment 265

Policy S1 para 4 specifies 10 permanent pitches. Paragraph 3.11 refers to a need for 18. Clarification of how these two figures relate to each other would be helpful.

Comment 266

Paras 3.47, 3.50 and Policy S3 Climate Change and Mitigation: there needs to be more explicit recognition of the need to take action regarding the risk of groundwater flooding, especially in the town centre, given recent history, and immediately surrounding areas.

Comment 267

Policy S4 Epsom Town Centre: broadly support a diverse mix of uses, hence query the limitation to housing and education floorspace for town centre regeneration sites in para 3.24.

Para 3.56: why no acknowledgement that the Town Centre Conservation Area is on Historic England's risk register?

Comment 268

Chapter 4 Planning for Places

SA6 Hope Lodge car park - suggest inclusion of the Important View across Dulshott Green from The Parade as originally identified in the Church Street Conservation Area Appraisal and associated map (December 2010).

Chapter 4 Planning for Places - suggest inclusion of reference to the Town Centre Management Plan to the site allocations within the town centre. Suggest inclusion of acknowledgment that the Town Centre Conservation Area is on Historic England's risk register to strengthen justification for heritage protection and enhancement.

SA6 Hope Lodge car park - suggest inclusion of reference to the Important View across Dulshott Green from The Parade as originally identified in the Church Street Conservation Area Appraisal and associated map (December 2010).

Comment 269

Chapter 4 Planning for Places

SA7 former Police and Ambulance Station sites: reference to the adjoining Church Street Conservation Area is needed.

SA7: add reference to adjoining Church Street Conservation Area (cf. reference in SA8 Epsom Clinic to the Conservation Area).

Comment 270

DM1 Residential Space Standards: the Plan omits an external minimum space standard. In terms of outdoor space, the previously proposed minimum of 20sq m garden space for houses has been abandoned. DM1 paragraph 1b) ii) makes no reference to a minimum size. No alternative provision has taken its place. The reference in para 7.7 to a 20 metre separation distance is not an adequate substitute. Notwithstanding land shortage, living accommodation standards, including external space provision should be maintained.

DM1 Residential Space Standards: include a minimum standard for private garden space, preferably larger than the previously proposed 20 sq metres. (as per Epsom Civic Society).

Comment 271

Policy S8: Gypsies, Travellers and Travelling Showpeople; and paras 5.44, 5.46 (cf Policy S1 para 4 and para 3.11 - previously commented on, requesting clarity over the need for 18 pitches but planning only for 10).

Clarification and justification needed for positively planning for 10 pitches only when the need is 18. Is this discriminatory / running counter to the Equalities Impact Assessment?

Comment 272

Policy S11 Design. The policy is weak, being unsupported by an operational Borough Design Code or by area Design Guides with specifics on limits to building heights on an area-by-area basis and a threshold definition of 'tall buildings'. The policy needs strengthening to support the delivery of good design, enhancement of local character and protection of heritage assets and conservation areas as required by legislation and the NPPF. As written it is insufficiently robust to withstand applications for unacceptably tall towers such as are happening elsewhere in Surrey and in some outer London boroughs.

The policy would be strengthened / supported by:

- including a replacement for Plan E's town centre building height Policy E7 (2015) in the draft Plan
- reference to the Town Centre Masterplan's height recommendations
- explicit acknowledgment that both the Town Centre Conservation Area and Horton Conservation Area are - and for many years have been - on Historic England's risk register
- a policy in place that replicates, with appropriate area modifications, Policy D9 of the London Plan 2021

- as an absolute minimum, the word 'height' should be included in Policy S11 paragraph b)

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- as an absolute minimum, inclusion of the word 'height' in Policy S11 paragraph b)

The Design Guide for Stoneleigh and Auriol's draft Neighbourhood Plan is a good start.

Comment 273

S13 Preserving identity of place with heritage

This is welcome, however this policy fails to acknowledge that two of the Borough's Conservation Areas are on Historic England's risk register and have been for many years. A more proactive policy in place could address this specifically. Pleased to note that a Local Plan Heritage Topic Paper is included in the list of key supporting documents. Unfortunately, at time of writing this submission, the document is not available on the council's website.

Comment 274

DM13 Development Impacting Heritage Assets

DM13: The policy fails to acknowledge that heritage assets are particularly vulnerable in the two Conservation Areas that are on Historic England's risk register, and have been for many years. A more proactive policy in place could address this specifically. Pleased to note that a Local Plan Heritage Topic Paper is included in the list of key supporting documents. Unfortunately, at time of writing this submission, the document is not available on the council's website.

Comment 275

Policy S14 Biodiversity and Geodiversity

Suggest 'mitigation' is added to S14 2) so that it reads "...appropriate mitigation and / or compensation will be sought".

Comment 276

Policy S16 Flood Risk and Sustainable Drainage

Policy S16 should acknowledge more extensively the risk of groundwater flooding and identify specific requirements for appropriate mitigation measures. SFRA 2018 Para 1.2: "In

addition to surface water flooding, some of the most recent flood events in the Borough were those of groundwater flooding in 2000, 2002 and 2014. Flooding caused by groundwater can be localised, occur with little warning, last with extended duration and at any location within high-risk areas, causing much damage to property and severe disruption. It is essential to ensure that future planning decisions acknowledge this and do not inadvertently increase the potential risk of localised flooding."

Comment 277

Paragraph 8.2 would benefit from the inclusion of cross-referencing.

Include cross referencing.

Comment 278

DM 19: Open Space, Sport and Recreation. Designation of Local Green Spaces (para 6) is welcome. The Policies Map is unclear as to which sites have been designated.

Clarify the designated Local Green Spaces on the Policies Map and amend the key accordingly. Put a list of sites in an appendix.

Comment 279

Chapter 9 Implementation and Monitoring

Entries for policies S13 and DM 13 in Chapter 9 are the only references to a 'buildings at risk' register, presumed to be Historic England's risk register.

For policy S13, suggest adding a third indicator: 'Number of Conservation Areas identified as at risk.' for consistency with Policy DM 13, where this indicator is specified.

The annual target / plan period target is insufficiently ambitious for both policies, referring to 'No increase'. Suggest adding 'decrease' both for listed buildings at risk and for Conservation Areas at risk.

In Chapter 9 for Policy S13, add a third indicator: 'Number of Conservation Areas identified as at risk.' for consistency with Policy DM13 where this indicator is specified.

To increase ambition for annual target / plan period for both S13 and DM13, suggest adding 'decrease' both for listed buildings at risk and for Conservation Areas.

Comment 280

Appendix 1 Glossary: suggest adding 'Active Travel', 'Fluvial Flooding', 'Pluvial Flooding', 'Groundwater Flooding' or incorporating these flooding terms into the entry for SFRA (all suggested entries' meanings surely less obvious than the entry for 'older people').

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Comment 326

Chapter 4 Planning for Places

Site Allocation SA30 Epsom General Hospital is unduly prescriptive and restrictive in its particulars, essentially repeating, without more, the proposals from a previous planning approval. We would like to see a more forward-looking and visionary approach with less prescription and more flexibility as to what this site could be allocated 'for', which also acknowledges a desire to conserve and where possible enhance the nearby Chalk Lane Conservation Area.

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