



## **Local Development Framework Core Strategy Submission Document June 2006**

### **Self Assessment of Soundness**

#### **Introduction**

The Council has carried out this informal assessment in accordance with the advice contained in *Development Plans Examination – A guide to the Process of Assessing the Soundness of Development Plan Documents* published by the Planning Inspectorate in December 2005. It is being submitted alongside the Core Strategy document to show why Epsom and Ewell Borough Council considers this plan to be a sound development plan document.

#### **Procedural Tests**

##### **Test 1: The Core Strategy has been prepared in accordance with the Local Development Scheme**

The timetable for the production of the Core Strategy is identified in the Council's Local Development Scheme (LDS) which came into effect on the 15 April 2005 following approval by the Council and the Government Office for the South East. The Core Strategy has been approved by the Council at a meeting of its Strategy and Resources Committee on 27 June 2006.

The LDS describes the role of the Core Strategy as the document that 'sets out the vision, strategy and core policies for development, up to March 2016'. Following the publication of draft PPS3 (Housing), the response from GOSE, and the submission of the South East Plan (with an end date of 2026), it was proposed that the Core Strategy should cover the period up until 2022 (15 years from its anticipated adoption in September 2007). It was felt that this would help provide greater certainty and clarity, and provide a firm basis for the development of the remaining development plan documents, and the evolution of the Community Strategy.

The Epsom and Ewell Core Strategy contains a spatial vision and objectives and includes key policies for meeting that vision. The document reflects the profile outlined in the LDS.

#### **Evidence:**

Epsom and Ewell Local Development Scheme  
Statement showing how the LDS has been adhered to.

**Test 2: The Core Strategy has been prepared in compliance with the Statement of Community Involvement (SCI), or with the minimum requirements set out in the regulations where no SCI exists**

The Council adopted its SCI in April 2006. Although the process of developing the Core Strategy began in September 2004, the consultation procedures that have taken place have been in conformity with the adopted SCI.

The SCI provides details of the nature of the consultation used to develop the Core Strategy. This builds upon the statutory requirements. In addition to the Consultation Statement required by Regulation 28, the Council has produced a document which demonstrates how the preparation of the Core Strategy has been in conformity with the SCI.

What follows is a brief summary of the key consultation stages in the production of the Core Strategy:

***Regulation 25: Pre-submission consultation***

*Early Stakeholder & Community Engagement*

21 October 2004: Open evening / exhibition held to inform interested parties about the Local Development Framework. This was publicised through a notice in the local "Guardian" newspaper and on the Borough's public notice boards. Publicity was also given through an article in the Borough Council's 'Insight' magazine which was distributed to every household in the Borough and made available at the Council offices.

*Consultation on Issues and Options stage*

- The Council produced an Issues and Options paper, highlighting various issues that affect the Borough with the aim of generating debate and providing the opportunity for stakeholders to give opinions.
- The Issues and Options paper, and its associated questionnaire, were sent to over 250 stakeholders which included the statutory consultees (Specific Consultation Bodies as identified in Annex E, PPS 12).
- The initial Sustainability Appraisal Report was made available on the Council's website
- The consultation period ran from 3 June to 15 July 2005
- The consultation documents and those required by the regulations were made available on the Council's website, at the Town Hall (in Epsom), and at local libraries throughout the Borough
- A notice was placed in the local "Guardian" newspaper to publicise the consultation process and identify response opportunities
- A further open evening / exhibition was held to inform stakeholders about the Core Strategy and gain views on the issues that they consider affect the Borough. This was publicised on the Borough's notice boards, on the website, through writing to stakeholders and by a notice in the local Guardian newspaper.

**Regulation 26: Pre-submission public participation**  
*(Consultation on the Preferred Options stage)*

- Responses from the Issues and Options stage were taken into account when preparing the Preferred Options document.
- This document presented a range of options, clearly identifying those preferred by the Council, and a number of alternatives
- The Preferred Options document, its associated questionnaire and the supporting documents, were again sent to the stakeholders listed on the Council's consultation database (including those consulted at the Regulation 25 stage). The accompanying Sustainability Appraisal Report was made available on the Council's website (and in paper form on request)
- The consultation period ran from 17 January to 28 February 2006
- The consultation documents and those required by the regulations were made available on the Council's website, at the Town Hall and at local libraries
- A notice was placed in the local Guardian newspaper to publicise the consultation period and the opportunity to respond

**Regulation 27: Representations on proposals for a development plan document**

- The Council considered and took into account all the representations received when preparing the Core Strategy Document submitted to the Secretary of State

**Regulation 28: Submission of documents and information to the Secretary of State**

- 2 copies and electronic versions of the Core Strategy Submission Document, Sustainability Appraisal Report, Statement of Community Involvement, Regulation 28 (c) and (d) Consultation Statement and relevant supporting documents were submitted both to the Secretary of State via the Government Office for the South East on 5 July 2006, and to the Planning Inspectorate (in accordance with a service level agreement)
- The consultation period is running for six weeks from the 5 July to 16 August 2006.
- The submitted documents and supporting materials are being made available at the Town Hall, on the Council's website and at local libraries
- The documents, along with accompanying statements, were sent to the stakeholders listed on the Council's consultation database (including those consulted at the Regulation 25 stage).
- A notice was placed in the local Guardian newspaper to publicise the submission of the Core Strategy

***Regulation 30: Conformity with the regional strategy***

This requires the Local Planning Authority to make a request for views on conformity with the Regional Spatial Strategy. On the same day as the date on which the Core Strategy was submitted, such a request was sent to the South East of England Regional Assembly (SEERA) accompanied by all the relevant documentation.

SEERA was also consulted informally during the final stages of the production of the Core Strategy, prior to the finalisation of the document.

***Regulation 31: Handling of Representations: General***

Copies of all the representations received will be made available for inspection, in paper form at the Town Hall and local libraries and electronically on the Council's website. Copies of the representations will be sent directly to the Planning Inspectorate.

**Evidence:**

Regulation 28 Consultation Statement (Regulation 28 (c) and (d))  
Core Strategy Conformity with Community Strategy Statement  
Statement of Community Involvement (SCI)  
Copies of notice in local newspaper  
Matters Statement  
Inspection Statement  
Committee Report (Adoption of the SCI)  
Correspondence to PINS, GOSE, SEERA and consultees  
Regulation 30 Conformity letter

**Test 3: The plan and its policies have been subjected to a Sustainability Appraisal**

The Core Strategy has been subject to sustainability appraisal throughout its production in accordance with legislation and government guidance. The process has been iterative, with the results of the appraisal being used to inform and guide the development of the Core Strategy.

A unique method of joint working has been adopted by the Council to ensure the appraisal process is robust and retains an independent element. The Council has conducted the sustainability appraisal process in collaboration with four other East Surrey authorities, with each signing a service level agreement to demonstrate their commitment to this process. The group has employed Tom Jones MRTPI, an Independent Consultant, to oversee the sustainability appraisal process and to provide a valuable external 'expert opinion' at each stage.

## ***Scoping Report***

The Council prepared a Draft Scoping Report which it consulted on from the 23 February to 1 April 2005. The Draft Report was sent to wide range of specific and general consultees, including the four statutory environmental consultation bodies designated in the Strategic Environmental Assessment Regulations (the Countryside Agency, English Heritage, English Nature and the Environment Agency). Following their responses, the Draft Report was amended and the final version was approved by the Council in May 2005.

## ***Initial Sustainability Appraisal Report (ISAR)***

Although not explicitly required by the finalised guidance - *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM 2005* - the Council conducted an Initial Sustainability Appraisal Report of the Core Strategy Issues and Options Document to ensure that sustainability issues were considered from the outset. The appraisal was conducted by appraisers from the East Surrey group and the Independent Consultant referred to above; a process known as 'peer review'. Representatives from Epsom and Ewell Borough Council were available to answer questions and provide information throughout the appraisal. A copy of the ISAR was made available for comment as a supporting document during the consultation period on the Core Strategy Issues and Options paper (3 June to 15 July 2005).

## ***Sustainability Appraisal Report Preferred Option stage and Submission Document***

The Council prepared the Core Strategy Preferred Options paper after considering the consultation responses from the Issues and Options paper and the ISAR. The Preferred Options document was subject to a Sustainability Appraisal, again using the East Surrey 'peer review' process. The resulting Sustainability Appraisal Report was made available for comment alongside the Preferred Options document during the consultation period (17 January to 28 February 2006).

Following this consultation period, the Council drafted the Core Strategy Submission Document. Many of the objectives identified as the 'preferred options' by the Council in the Preferred Options document were developed into policies in the submission document. A comparison of these objectives and the resulting policies demonstrated the similarities and it was therefore considered unnecessary to re-appraise the policies. However a number of 'new' policies were introduced as a result of responses received, and new evidence, and these were subjected to a further Sustainability Appraisal to ensure they would contribute towards sustainability objectives. The Preferred Options Sustainability Appraisal Report was subsequently revised to include these additional policies. This Report was submitted alongside the Core Strategy Submission Document as a supporting document.

**Evidence:**

Epsom and Ewell Sustainability Appraisal Scoping Report  
Initial Sustainability Appraisal Report  
Sustainability Appraisal Report (Preferred Options and Submitted Core Strategy)  
Comparison of Preferred Options Objectives with Submission Document policies  
Characterisation of the Area report 2005  
Epsom and Ewell Committee Report 11 May 2005

**Conformity Tests**

**Test 4: It is a spatial plan which is consistent with national planning policy and in general conformity with the RSS for the region, or the Spatial Development Strategy if in London, and it has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas**

**(a) It is a spatial plan which has regard to other relevant plans, policies and strategies**

In accordance with PPS12 it is the Council's opinion that the Core Strategy is a spatial plan which has been prepared with a view to integrating the delivery of policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.

Government guidance on spatial planning set out in Planning Policy Statements and companion publications, has shaped the development of the Core Strategy and it has been prepared in consultation with many stakeholders, including - key service providers, adjoining authorities, Surrey County Council and members of the Borough's Local Strategic Partnership.

Comments received from engaging with the community have informed the preparation of the Core Strategy throughout its development stages.

The Borough of Epsom and Ewell has not been identified in the regional spatial strategy as an area expected to accommodate major land use change. However there are many other plans, policies and programmes which provide a framework for spatial planning and will influence the level and timing of future development within the Borough. Part of the Council's collaborative working for the Sustainability Appraisal process resulted in the production of a document which identified all those policies, plans and programmes that would influence the Scoping Report and the Core Strategy. This helped to ensure that the objectives and targets of these other programmes were considered during the production of the Core Strategy and that the resulting policies are compatible and, where possible, will help to deliver such targets and objectives.

The Core Strategy itself sets out the overall vision for the future of development within the Borough. It makes provision for 2715 homes over the period 2007 to 2022 which is in general conformity with the submitted South East Plan. The wording of the policy, the annual monitoring arrangements, and the process of 'Plan, Monitor and Manage' will provide the flexibility required to ensure successful delivery of the housing strategy, and to meet unexpected changes in circumstances. The Council will carry out a comprehensive review of the housing situation once the South East Plan is finally approved, and will prepare, and keep up to date, a *Housing Delivery Action Plan* as recommended by SEERA in the SE Plan.

The plan reflects the priorities and objectives of the Regional Housing Strategy, Regional Economic Strategy and the Surrey Local Transport Plan.

**Evidence:**

Regional Spatial Strategy (Submitted South East Plan March 2006)  
Regional Planning Guidance 9: South East  
Draft Regional Economic Strategy 2006  
South East Regional Housing Strategy 2005  
Surrey Local Transport Plan 2  
Plans, Policies and Programmes influencing the Epsom and Ewell Local Development Framework (PPP list)

**(b) It is consistent with national planning policy**

The Core Strategy has been prepared in accordance with the guidance set out in PPS 12. It satisfies the requirements in terms of its framework, vision and objectives for the area and broad policies for their delivery. It is a spatial document, which has taken account of social, economic and environmental issues that are facing the Borough and has a clear monitoring framework to help ensure it is meeting its objectives.

The national planning policies are set out in Planning Policy Guidance and Planning Policy Statements which are gradually replacing the guidance notes. As a strategic document, the Core Strategy is closely aligned with these national policies and the Council considers there to be no deviation from national planning policy. The "Plans, Policies and Programmes influencing the Epsom and Ewell Local Development Framework" (PPP list), illustrates the range of policy documents that has influenced the contents of the plan.

The Council has liaised with both the Government Office for the South East (GOSE) and the South East of England Regional Assembly (SEERA) during preparation of the Core Strategy. This has helped ensure the document is in conformity with national policies and that proper procedures have been followed. A pre-submission meeting was held with GOSE to discuss a final draft of the Core Strategy. A copy of the pre-submission document was also sent to SEERA for their input before the final draft was submitted for examination.

**Evidence:**

Planning Policy Guidance Notes  
Planning Policy Statements  
GOSE Representations  
Representations and correspondence from SEERA  
PPP list

**(c) The plan is in general conformity with the Regional Spatial Strategy or, where relevant the Spatial Development Strategy in London**

Under regulation 30, the Council has requested the opinion of the South East of England Regional Assembly as to whether the Core Strategy is in conformity with the regional strategy. The Council has prepared this 'self assessment of soundness' to be submitted alongside the Core Strategy so expects to receive a response from SEERA within 6 weeks of the date of submission.

**Evidence:**

Regional Planning Guidance 9: South East  
Submitted South East Plan - March 2006  
Correspondence from SEERA

**Test 5: It has regard to the authority's Community Strategy**

The Local Development Framework (LDF) is a portfolio of documents which will provide a planning mechanism for the delivery of elements of the Community Strategy and to assist in the achievement of its key priorities. The Community Strategy has been produced by the Local Strategic Partnership (LSP); a group of twenty or so different interests in the community from the statutory, business and voluntary sectors. It has been developed in consultation with local people and organizations, and focuses on key issues affecting the quality of life in the Borough.

The Core Strategy contains policies to help deliver the aspirations expressed in the Community Strategy. The Core Strategy forms a link between the Community Strategy and the more detailed policies set out within the other Development Plan Documents. Although it may not be possible for the Core Strategy to contribute directly to each and every one of the specific objectives of the Community Strategy, being a spatial plan it can have a very positive influence on their achievement and on the delivery of the vision held by the LSP.

The Core Strategy has remained on the agenda of meetings of the Local Strategic Partnership throughout its production, and at an early stage the Council produced a document illustrating how the Core Strategy can help deliver the aims and objectives of the Community Strategy. Members of the



LSP have therefore been consulted at each stage in the Core Strategy's development.

**Evidence:**

Epsom and Ewell Community Strategy 2003 (including Strategy for Epsom town centre) and subsequent action plans  
Local Strategic Partnership meeting agendas/minutes  
Conformity of Core Strategy with Community Strategy document

**Coherence, Consistency and Effectiveness Tests**

**Test 6: The strategies / policies / allocations in the plan are coherent and consistent within and between Development Plan Documents prepared by the Authority and by neighbouring authorities, where cross boundary issues are relevant**

The Council considers the strategies and policies within the Core Strategy to be coherent. It is the authority's opinion that they are in conformity with national and regional policies and have been tested against numerous sustainability objectives.

The Core Strategy is the first Development Plan Document (DPD) to be produced by the Council. It sets the direction for future development within the Borough, and subsequent DPDs and Supplementary Planning Documents (SPDs) will be in conformity with it.

When compared with neighbouring authorities, the Council is the first to submit a DPD for examination. At each stage in the development of the document, each neighbouring authority has been consulted. There have been no concerns raised as to potential conflicts with neighbouring authorities' plans or aspirations for their areas.

The Borough works particularly closely with adjoining Surrey authorities - both through the East Surrey Sustainability Appraisals collaboration exercise and through officers attending regular planning policy meetings with all the Surrey Districts. The Council remains aware and informed of the adjoining London Boroughs' LDF progress through contact with their staff and through surveillance of their websites.

**Evidence:**

Local Development Schemes of neighbouring authorities  
Representations from neighbouring authorities  
Epsom and Ewell District Wide Local Plan 2000

**Test 7: The strategies / policies / allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base**

The Issues and Options paper, Sustainability Appraisal and consultation feedback, assisted greatly in the identification of the social, economic and environmental issues that face the Borough. These are all clearly expressed in Chapter 2 of the Core Strategy Submission Document.

The Preferred Options stage then progressed, using feedback from the consultation and information from the Initial Sustainability Appraisal Report to develop a series of options that would form the spatial strategy for the Borough and which would help address the issues previously identified. Supporting studies, such as the Surrey Housing Potential Study, along with national and regional policies, helped inform the development of the options, and were a valuable source of information when selecting those that would be developed into policies in the Core Strategy Submission Document. Selection of the options to be developed involved careful consideration and testing of the Council's 'preferred options' and the identified alternatives. Consultees were involved in the selection process and the options were subject to a thorough Sustainability Appraisal.

The Council is confident that the decisions made and the resulting vision and policies in the Core Strategy Submission Document have been developed through an iterative and well informed process, in line with Government policy and intentions behind the changes to the development plan system introduced by the new Act.

The gathering of evidence and identification of local aspirations has, in the authority's opinion, led to the most sustainable and appropriate approach being adopted for future development within the Borough. Through guidance from the national and regional policy framework, and input from the sustainability appraisals and consultation, the resulting policies have been demonstrated to be the most sustainable options which will help to ensure the long term vitality of the Borough and improve the quality of life of its residents and visitors.

**Evidence:**

Planning Policy Guidance notes / Planning Policy Statements  
GOSE representations/responses  
Regional Planning Guidance 9: South East  
Submitted South East Plan (March 2006)  
Epsom and Ewell Community Strategy 2003 (including Strategy for Epsom Town Centre) and subsequent action plans  
Epsom and Ewell - Characterisation of the Area report 2005  
LDF Consultation documents  
Sustainability Appraisal Report (Preferred Options & Submission Document)  
Surrey Local Transport Plan 2006  
Epsom and Ewell Annual Monitoring Report

Epsom and Ewell Borough Housing Needs Survey 2004  
Sub-regional Housing Markets Study (DTZ 2004)  
Surrey Housing Capacity Study 2005 and regular quarterly monitoring returns  
(Supplementary housing land availability study to be produced once PPS3 issued).  
Employment Land study  
Various Epsom and Ewell Borough Council Committee Reports

### **Test 8: There are clear mechanisms for implementation and monitoring**

Each policy within the Core Strategy (apart from the overarching sustainability policy), is followed by a section which provides details of the mechanisms for its delivery and the indicators which will be used to monitor its progress and effects. It is considered that the Core Strategy policies which follow the initial overarching sustainability policy will assist in its delivery, as each has been shown to further the sustainability objectives.

The Council will put into place and maintain a robust monitoring system which will help ensure that data for the indicators is accurately measured and recorded. Progress will be reported through the Annual Monitoring Report which, as stated in the Core Strategy Submission Document, will provide the opportunity to keep the effectiveness of the strategy under regular review and to highlight the need for any changes to be made.

#### **Evidence:**

Annual Monitoring Reports

The LPA will produce an internal “monitoring strategy” to guide the production and reporting of the AMR, and it’s co-ordination with other Council monitoring systems

### **Test 9: It is reasonably flexible to enable it to deal with changing circumstances**

The Local Development Framework for the Borough will consist of a series of policy documents as opposed to the previous development plan system which involved the production of a single Local Plan. The new system enables the individual documents to be more easily updated when the need arises, without requiring a review of the entire plan.

The Core Strategy for Epsom and Ewell Borough has been written in such a way as to ensure it provides a clear and robust statement of strategic policies which address the issues the Borough will face over the next 15 years or so. However where change is necessary as a result of changing circumstances or new policy, it will be possible to review and amend elements of the plan. More detailed policies will follow in subsequent development plan documents. The

Council also intends to produce supplementary planning documents to cover the mechanisms for implementing policies. It will often be these documents that contain the detailed information that will require more regular updating and will need to be adaptable to changing circumstances. It is envisaged that due to its strategic nature, the Core Strategy document itself will require minimum revision over the period following its adoption.

Many of the policies within the plan are flexible with decisions being guided by the Plan, Monitor and Manage approach. For example CS10 avoids prescribing specific density levels to allow individual sites to reflect the character of their surrounding areas within the national policy guidance. CS13 relating to employment land avoids a blanket protection policy, protecting certain areas while allowing some losses of employment land. Losses will be carefully assessed and decisions guided by the Council's monitoring to ensure the needs of the area and local economy are being met. CS8 sets out sustainability principles for new developments, while the detailed guidance will be contained in an SPD which can be more easily revised to reflect, for example, improvements in technologies.

It has been stated in the Core Strategy that the position on housing provision will be reviewed following the formal adoption of the South East Plan. Annual monitoring and the production of a *Housing Delivery Action Plan* will help to ensure that targets are being met.

<b>Evidence:</b> Annual Monitoring Report
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