

Oxted & Limpsfield Residents

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Oxted & Limpsfield Residents Group – 20 June 2017

Re: Council Consultation on proposals for Oxted Town Centre.

Oxted & Limpsfield Residents Group (OLRG) is a formally constituted residents' association with 2,600 members (approx.) and proactively engages in planning matters affecting the local community.

OLRG has two Tandridge District Councillors representing the area concerned – one representing Oxted North & Tandridge, the other representing Limpsfield.

The Council has produced a tick box questionnaire to gather opinion on Oxted town centre but this makes it hard to address the complexities of the issues involved and therefore we have not used the questionnaire but instead submit the following comments:

1. Oxted Town Centre

The proposals, for what the Council has termed "RegenOxted", centre on improving the appearance of the two shopping streets Station Road East (primary frontage) and Station Road West (mainly secondary frontage) and the underpass that links them.

OLRG welcomes the proposed facelift aimed at making these streets look a bit smarter. In particular, the pavements are uneven and can be dangerous and need resurfacing as soon as possible. More trees and greenery and better signage are also to be welcomed. The underpass should be kept clean and well lit.

OLRG is keen that more visitors are attracted to Oxted, that the shops achieve greater footfall, and that those visitors spend more money.

Our Councillors have close contacts with many of the retailers who have made plain to them their concerns, in particular the lack of parking, the Council's recent decision to charge shoppers for off-street parking, and high rates and rents.

We would emphasise that there is a severe under-provision of parking at the moment which deters shoppers from visiting the town.

OLRG continues to believe that it is counterproductive for the Council to bring in car park charges after 1 hour and that this will deter shoppers from visiting.

We are concerned about the direction of recent decisions regarding Oxted town centre which seem contrary to the aim of increasing the attractiveness of the town centre and so increasing footfall

and visitor spend. We are anxious that nothing is done that will be to the detriment of the businesses or that will put any more pressure on the High Street and jeopardise its future.

We are concerned about some statements in the urban design statement from Greer Pritchard. For example, it states that its proposals for Station Road East and Station Road West “*could reduce on-street parking spaces by approximately 35%.*” The chart below, using figures taken from the Council's own Parking Review Study for Oxted commissioned from consultants Systra and dated 17 February this year, shows this would mean a loss of 40 spaces.

Road	Current Capacity	Spaces lost with a 35% reduction	
Station Rd East	79	28	
Station Rd West	35	12	
Total	114	40	

The Council's recent news releases and public statements say that “*the Council is developing detailed options for additional capacity which could provide in the region of 40% more spaces.*”

However, it does not define what the 40% is a percentage of thereby rendering the statement meaningless and open to a wide variety of interpretations.

Having pressed the Council Leader and the Chief Executive for clarification of what this actually means we were informed by the Council Leader: “*My statement of increased car parking capacity by 40% refers to council controlled car parks not “on” and “off” street parking.*”

There are 227 council controlled public car parking spaces (Ellice Road, Johnsdale and small Gresham Road car park). A 40% increase would therefore require an additional 91 spaces to be created. We are confident that we can achieve at least this many.”

To put this in context, the Systra Oxted Parking Review Study shows that there are a total of 1558 parking spaces available. Therefore, 91 spaces is actually 5.84% of the total availability not 40% and it is important that, in future, the Council's news releases and public statements make clear what parking it is referring to when it gives percentages, and that the Council avoids misleading the public into thinking it is referring to 40% of the total parking capacity.

The Greer Pritchard statement places heavy emphasis on reducing vehicle movements within the town centre by encouraging alternative means of transport such as public transport, walking and cycling. This is mentioned throughout the document. At a meeting last November of the Oxted Town Centre Working Group, it was repeatedly stated that people should be “re-educated” so that there isn't such dependency on coming by car.

We are concerned this may be unrealistic for Oxted because the town is not a destination shopping centre but relies instead on convenience shoppers who expect to be able to drive in, park and shop and who may be easily put off and likely to go elsewhere if they cannot do so (this was confirmed by the survey undertaken with Oxted town centre users as part of the Systra Parking Review Study); because cycling into Oxted is not easy and there are road safety issues with cycle access especially from south of the A25; and because there is an elderly demographic for whom cycling or walking may not be a feasible option.

The urban design statement comments: “*The local cycle shop could run training sessions to boost confidence and lend technical assistance.*” However, the cycle shop has recently closed down.

2. Shared space

OLRG's Oxted North & Tandridge Councillor is a member of The Tandridge Access Group which works for the interests of the disabled and those with limited mobility. The Group is concerned especially with investigating and resolving difficulties with physical access to public places.

The Tandridge Access Group has concerns regarding access to the disabled station lift in Station Road East. They feel that if the area currently used as a taxi rank is to be used for markets and other regular activities they will not be able to use the disabled parking bays currently directly outside the Station Road East lift for the disabled that is located at the entrance/exit.

This would mean that anyone wishing to use this vital facility would have to come from Station Road West, where there are very few disabled parking spaces and it is also very difficult for carers bringing multiple disabled users to the station via minibuses or taxis.

Another concern is the proposed shared space in Station Road East. The RNIB and Guide Dogs for the Blind have done considerable research and found that such areas are very confusing and unsafe for blind or partially sighted people and also for people relying on their guide dogs to alert them to where and when it is safe cross the road.

We refer the Council to the 2015 report by Lord Holmes which includes these key findings:

- Over a third of people actively avoid shared space schemes.
- 63 per cent of people who have used shared space schemes rated their experience as poor.
- Significant under-reporting of accidents in shared space.

The report can be read on this link:

<http://www.theihe.org/wp-content/uploads/2013/08/Holmes-Report-on-Shared-Space-.pdf>

3. Station Road West

Station Road West has a substantial proportion of secondary frontage and is a marginal High Street where boosting footfall is particularly important. Once again, parking is vital to the survival of this area and OLRG is keen that nothing is to be done to reduce parking provision and inhibit footfall.

4. Oxted Gasholder

OLRG welcomes the redevelopment of the Oxted gasholder site.

This redevelopment is a self-contained proposal, separate from any other plans for Oxted Town Centre. It is driven by The Berkeley Group (operating as St William) who are in partnership with the site's owners, National Grid and SGN. We understand National Grid and The Berkeley Group have established a joint venture to redevelop redundant gasholders across London and the South East.

We further understand that The Berkeley Group's current proposal is for a development of 70 one, two and three bedroomed flats to be sold at market rates with 1.2/1.3 parking spaces per flat.

Parking provision

70 flats gives a total of $1.2 \times 70 = 84$ spaces; $1.3 \times 70 = 91$ spaces.

This parking provision is considerably less than that set out in the Council's own adopted Parking Standards SPD which is:

Size of dwelling (see note 1)	Requirement	Notes
1 and 2 bedroom flats	1.5 spaces unallocated (preferred) OR 2 spaces allocated	See note 2
3 bedroom flat	2 spaces unallocated (preferred) OR 2 spaces allocated plus 0.25 unallocated.	See note 2

Making an assumption of an equal spread of one, two and three bedroom flats (because so far as we know, this has not yet been determined) the disparity between what the developer is proposing and the Council's Parking Standards SPD is as follows:

Size of apartment	Assumed Number of apartments	TDC Regulations Spaces per apartment	TDC required Parking spaces	Developer proposed Spaces	Developer proposed parking spaces.
1 Bed	24	1.5	36	1.3	31.2
2 Bed	23	1.5	34.5	1.3	29.9
3 Bed	23	2	46	1.3	29.9
Total			116.5		91.0
Shortfall					25.5

As is clear, there is likely to be a considerable parking shortfall from this development and we urge the Council not to accept this and to abide by its Parking Standards document, especially given the universally acknowledged parking problems that already exist in Oxted Town Centre.

The consequence of not implementing the Parking Standards document will be more people driving around looking for parking spaces in an area where there is no spare parking capacity – and where the current on-street parking capacity may be reduced by 35%. The cumulative impact of this development on the overall parking provision needs to be properly taken into account.

In addition, failing to implement the Parking Standards document will set a precedent that undermines the Council's document, making it harder to enforce in the future and leading to more developments which are under-provided with parking. We see little point in the Council producing SPDs if it then fails to implement them.

Affordable housing

The development as currently proposed contains no affordable housing and therefore does nothing to tackle the affordable housing issues that the Council has raised as a priority to be addressed in its emerging Local Plan. High priced flats are not a priority for Oxted.

OLRG wants to see affordable housing content in this development and we urge the Council to press for affordable housing for local people as part of the gasholder scheme in line with the Council's expressed Local Plan priorities.

5. Help for small businesses

Apart from a few terminals being provided in the library, there appear to be no real ideas for assisting small businesses.

OLRG believes it is very important any such proposals reflect the reality of the local economy.

6. Conclusion

More parking is needed in the town centre. Both residents and businesses see this as a major priority and so the direction of the Greer Pritchard urban design statement and its proposals should be amended to provide an appropriate solution for Oxted.

OLRG welcomes the redevelopment of the gasholder site but wishes to see affordable housing for local people included in the scheme, and the parking provision to be in line with the Council's adopted Parking Standards document.