

# Development Management Plan Consultation Statement

September 2017

**Contents**

1. Introduction ..... 3

2. Engagement and consultation prior to Regulation 18 ..... 4

3. Regulation 18 Consultation Process ..... 5

4. Main Issues and Responses ..... 10

Appendix A – Copy of Online/Postal Survey ..... 11

Appendix B – Specific and General Consultation Bodies Contacted ..... 25

## 1. Introduction

- 1.1. Section 18 of the [Planning and Compulsory Purchase Act 2004](#) requires planning authorities to prepare a statement of community involvement setting out their policy on community involvement in the plan-making process. The [Reigate & Banstead Borough Council Statement of Community Involvement](#) was adopted in October 2013, and sets out a process for who the Council will consult on planning matters and how they will be consulted, which was followed during the Regulation 18 consultation period for the Development Management Plan.
- 1.2. Regulation 17 of the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#) requires planning authorities, when preparing a local plan, to publish “a statement setting out (i) which bodies and persons were invited to make representations under regulation 18, (ii) how those bodies and persons were invited to make such representations, (iii) a summary of the main issues raised by those representations, and (iv) how those main issues have been addressed in the local plan”. This Consultation Statement fulfils that requirement.
- 1.3. Section 2 of this statement will describe the consultation process, setting out which bodies and persons were invited to make representations and how they were invited. Section 3 will describe the main issues raised by representations during the Regulation 18 consultation, the Council’s response to them, and how the issues were addressed in the Regulation 19 document of the Development Management Plan.

## 2. Engagement and consultation prior to Regulation 18

- 2.1. In preparing its Regulation 18 consultation document, the Council undertook informal discussions and engagement with key parties and stakeholders.
- 2.2. Duty to Cooperate: The Duty to Cooperate requires that the Council cooperate on strategic matters relating to the sustainable development or use of land that would have a significant impact on at least two planning areas.
- 2.3. In preparing the Regulation 18 consultation document, the Council engaged with neighbouring authorities and statutory agencies. This has included liaising with neighbouring authorities in relation to proposed policy approaches and development proposals near shared boundaries or that may have a significant impact within their authority area. Co-operation on strategic matters, and discussions about potential development sites continued following the Regulation 18 consultation.
- 2.4. Informal engagement: A range of informal engagement was also undertaken. This included consulting with local community groups to inviting suggestions about potential development sites and designations. Comments provided were incorporated within the evidence base development work.
- 2.5. Considerable informal consultation with elected members was also undertaken on the main aspects within the Regulation 18 DMP consultation document. This included through the Development Management Advisory Group, member workshops, briefing sessions and one-to-one meetings – with comments being used to inform the preparation of the consultation document.

### 3. Regulation 18 Consultation Process

- 3.1. The Regulation 18 consultation was held between 1 August 2016 and 10 October 2016. This is a longer period than the statutorily required 6 weeks, to take account of the summer holidays and to ensure that all interested parties would have the time and opportunity to submit representations.
- 3.2. Representations were invited in a range of formats. An online survey was made available with the opportunity to indicate support, objection, or 'don't know' in relation to the objectives of the Development Management Plan (DMP) document and space for free comment. Paper and electronic (Word) copies of the survey were also available. A copy of this survey can be found in Appendix A. An interactive online map was also put on the Council's website, with respondents able to attach a comment to a particular site allocation or geographical area on the map. In addition, email and postal representations were accepted.
- 3.3. A Statement of Availability and Statement of Representations Procedure were published to explain where the DMP document could be found and how representations could be made. Copies of the DMP document and survey forms were made available in public libraries in Banstead, Horley, Merstham, Redhill, Reigate, and Tattenhams, and in the Town Hall building in Reigate. The document was also available online in pdf format, and paper copies were available on request to the planning policy team – black and white copies were sent out for free, colour copies were available for £10 due to the significant additional printing cost.

#### Explanatory Material

- 3.4. The following documents were developed to explain the contents of the DMP in the clearest way possible to a range of different audiences:
- 3.5. Area Briefing Notes – these briefly explained the proposed developments for different areas of the borough. Notes were produced for Banstead Village; Chipstead, Hooley and Woodmansterne; Earlswood, Meadvale and Salfords; Horley; Kingswood and Burgh Heath; Merstham; Nork and Tattenhams; Redhill; Reigate; South Park and Woodhatch; and Tadworth, Walton on the Hill and Preston. These were available on the Council's website and at public consultation events.
- 3.6. Topic Briefing Notes – these fact sheets briefly explained the DMP proposals on a range of topics. Notes were produced for biodiversity and nature conservation; design of new developments and back garden development; employment land; flooding and flood risk; green belt; heritage; housing; infrastructure; landscape; open space and recreation; RASCs and special townscape areas; shopping; strategic

employment provision; and sustainable urban extensions. These were available on the Council's website and at public consultation events.

- 3.7. Exhibition Boards – large (A1 size) posters were created for use in public consultation events. These posters covered: an introduction to the representations process; an introduction to the DMP contents; policies on the local economy; policies on design and parking; policies on open space and the environment; policies on cemetery provision, Gypsies, travellers and travelling showpeople, and infrastructure provision; potential development sites across the borough; and potential development sites in the specific areas of Redhill, Reigate, South Park and Woodhatch, Merstham, and Horley. These posters (with the relevant local area posters) were placed in Banstead Library between 23 August and 3 September 2016, Redhill Library and Woodhatch Community Centre between 4 September and 16 September 2016, Merstham Library between 19 September and 30 September 2016, and Horley Library between 20 September and 1 October 2016. An example of the boards can be seen below.



- 3.8. Mapbooks – the following mapbooks were available: proposed green belt amendments to anomalies and washed-over settlements; proposed principal and local employment areas; proposed residential areas of special character; proposed town and local centre boundaries; potential development sites for area 1 (North Downs: Banstead and settlements north of the M25), area 2a (Wealden Greensand Ridge: Redhill and Merstham), area 2b (Wealden Greensand Ridge: Reigate and Woodhatch), and area 3 (The Low Weald: Horley); and proposed urban open space for the same four areas. These mapbooks were made available on the Council's website.

- 3.9. Evidence documents – a full range of evidence documents that contributed to the DMP document were made available online. This included evidence on employment, environment and conservation, green belt, housing, infrastructure, open space, retail, and a sustainability appraisal.
- 3.10. Following discussion with the Surrey Coalition of Disabled People, it became clear that improvements could be made to improve the accessibility of documents to all disabled people, specifically around clarity about how to order large print copies, and provision of documents that were suitable for use by screen reading software. In response to this, a detailed ten page summary of the DMP proposals was created as a plain Word document (accessible to screen reading software) and in large print, and sent to the Surrey Coalition of Disabled People for distribution to its members.

### **Publicity and Engagement**

- 3.11. An A5 postcard publicising the consultation was sent to every address in the borough, a total of 60,197 postcards.
- 3.12. A feature supplement was placed in the Autumn 2016 edition of Borough News, the Council's regular news magazine. This introduced the DMP document, provided a map and description of proposed development across the borough, and explained how to submit a representation. Around 64,000 copies of Borough News are printed, and are delivered to every address in the borough.
- 3.13. A number of A3 and A4 size posters publicising the consultation were printed. These were sent to residents' associations, community centres, citizens advice bureaux, leisure centres, libraries, post offices, nurseries, convenience stores, supermarkets, and other community facilities, with a letter asking for the posters to be displayed on a notice board if possible. In addition, a set of large posters containing information about the proposals contained within the DMP were placed in the windows of Redhill train station between mid-September and the end of October. An example of the A3 posters can be seen below.



- 3.14. An email or letter publicising the consultation was sent to everyone on the planning policy team's consultation database, depending on their expressed contact preference. This was a total of 1,246 emails and 272 letters.
- 3.15. As part of this communication, emails or letters were sent to the relevant specific and general consultation bodies as defined in [Regulation 2](#) of the Town and Country Planning (Local Planning) (England) Regulations 2012. A list of the specific and general consultation bodies contacted can be found in Appendix B.
- 3.16. Drop-in sessions were held on fifteen occasions at five locations across the borough. These sessions provided an opportunity for members of the public to discuss the DMP with planning policy officers. They were held in the locations where the exhibition boards described earlier were located, and copies of the DMP document and relevant area and topic factsheets were available. Each session was attended by at least three officers, and in some cases local councillors. Three sessions were held at each venue, at different times of day and on different days of the week to make them as accessible as possible to all residents. The dates and times of the sessions were as follows:
- Tuesday 23 August – Banstead Library, 5pm-7pm
  - Thursday 25 August – Banstead Library, 11am-2pm
  - Saturday 3 September – Banstead Library, 10am-midday
  - Tuesday 6 September – Redhill Library, 5pm-7pm
  - Thursday 8 September – Redhill Library, 11am-2pm
  - Saturday 10 September – Woodhatch Community Centre, 10am-midday
  - Saturday 10 September – Redhill Library – 2pm-4pm



- Tuesday 13 September – Woodhatch Community Centre, 5-7pm
  - Thursday 15 September – Woodhatch Community Centre, 11am-2pm
  - Tuesday 20 September – Merstham Library, 5pm-7pm
  - Thursday 22 September – Horley Library, 11am-2pm
  - Saturday 24 September – Merstham Library, 10am-midday
  - Tuesday 27 September – Horley Library, 5pm-7pm
  - Thursday 29 September – Merstham Library, 3pm-5pm
  - Saturday 1 October – Horley Library, 10am-midday
- 3.17. The Council's Communications team sent out 116 social media posts on Twitter and Facebook. These had a reach of 1,049,099, generated 2,966 clicks, and were shared 266 times. Paid advertisements were also taken out on Facebook, reaching 32,495 people and generating 705 clicks.
- 3.18. An embargoed media briefing was sent out at the beginning of July to coincide with the publication of the Executive report on the consultation proposals. Further media briefings and news items on the Council's website were sent out at the beginning of July, the beginning of August, and the beginning of October. The consultation generated five stories in the Surrey Mirror, two in the Epsom Guardian, two on the Reigate.UK website, and one on the website of Eagle Radio. BBC Surrey Radio also broadcast an interview about the consultation with Councillor Tony Schofield (at that time the relevant portfolio holder) on 7 October 2016.

## Responses

- 3.19. In total, 1,141 representations were received during the consultation period.
- 3.20. Of these, 20 were from residents' associations, parish councils, or town councils (1.75%), 23 were from community organisations, such as schools, voluntary organisations, and campaign groups (2.02%), 7 were from local businesses (0.61%), 34 were from developers or landowners (2.98%), 26 were from other borough, district, or county councils, the Mayor of London's office, government agencies, or other statutory consultees (2.28%), and 1,031 were from individuals (90.36%).

## 4. Main Issues and Responses

- 4.1. The tables that make up the rest of this report set out the main issues raised by representations during the Regulation 18 consultation, the council's response to the issue, and any changes that were subsequently made to the DMP to address the issue. These tables have been split up by topic. These are included in Appendix

## **Appendix A – Copy of Online/Postal Survey**

### **Reigate & Banstead Borough Council's Development Management Plan (Local Plan)**

### **Regulation 18 Consultation Comments form**

**1 August – 10 October 2016**

**Thank you for taking the time to complete this comments form. Your views on the consultation document will help shape the Council's Development Plan Management (DMP).**

You may also submit comments via letter or email but hopefully you'll find this form easier. Please email to [LDF@reigate-banstead.gov.uk](mailto:LDF@reigate-banstead.gov.uk). Alternatively, use our interactive map which enables you to attach comments to specific points on the map at [www.reigate-banstead.gov.uk/dmp](http://www.reigate-banstead.gov.uk/dmp) or send to DMP, Town Hall, Castlefield Road, Reigate, RH2 0SH.

**Closing date for comments is 5pm on 10 October 2016.**

### **Filling in the survey**

This survey has two parts:

- Section 1 allows you to comment on the suggested plan objectives, overall scope of the DMP and general scope of the consultation document.
- Section 2 allows you to make detailed comments on the consultation document and evidence base.

Please note: We cannot accept anonymous comments; you must provide your name and address and postcode for your comments to be taken into account.

What happens next? This consultation is one stage in a longer process. Your comments will be taken into consideration by the Council as it prepares the draft Development Management Plan.

A second consultation is programmed for spring 2017 when further comments can be made on the draft Plan developed from this consultation. The Plan will then be examined by an independent planning inspector before it can be formally adopted by the Council.

1. Address. Name, email and postcode are the minimum required fields to fill in please. Your representations cannot be treated in confidence. The Council will publish names and the associated representations on its website but will not publish personal information such as telephone numbers or email addresses. By submitting this, you confirm that you agree to this and accept responsibility for your comments.			
Name			
Company			
Address			
Address 2			
City/Town			
ZIP/Postcode			
Email address			
Phone number			
2. Planning agents can use this box to add details of who they represent			
3. Updates: We will keep you informed of subsequent stages towards adoption of the plan unless you ring no.		Yes	No
<b>Section 1 : In this part of the survey we would like your views about the objectives of the plan.</b>			
<b>Theme 1 : Growing a prosperous economy</b>			
This chapter of the consultation document covers economic development, town centres and local centres.			
4. Do you support or object to the proposed scope of the following objectives that have been identified? Please cross all that apply.	<b>Support</b>	<b>Don't know</b>	<b>Object</b>
PE1 Safeguard existing employment land and premises to ensure that there is adequate space for business			
Comments			
PE2 Provide flexibility for local businesses to start up, grow, diversity and prosper			

Comments			
	<b>Support</b>	<b>Don't know</b>	<b>Object</b>
PE3 Help new development to deliver jobs and skills benefits for local people			
Comments			
PE4 Protect the vitality and viability of our town centre shopping areas			
Comments			
PE5 Protect the viability of smaller scale but vital local shopping areas			
Comments			
PE6 Ensure that both town and local centres are resilient and able to respond to future changes			
Comments			

<b>Theme 2 : Building self reliant communities</b>			
This chapter of the consultation document covers design, access, parking, open spaces, climate change, flooding and the natural and historic environment.			
5. Do you support or object to the following overall objectives that have been identified. Please cross those that apply.	<b>Support</b>	<b>Don't know</b>	<b>Object</b>
SC1 To ensure that new development makes the best use of land whilst also being well designed and protecting and enhancing local character and distinctiveness			
Comments			
SC2 To ensure an appropriate mix of housing types and sizes, offering a good standard of living to future occupants			
Comments			
SC3 To minimise the impacts of development, and the development process on local residents and local amenity			
Comments			
SC4 Protect the most valuable open space within the urban areas			
Comments			
SC5 Encourage the provision of open space as part of new developments, and where appropriate new			

outdoor sport and recreation provision			
Comments			
	<b>Support</b>	<b>Don't know</b>	<b>Object</b>
SC6 Require new developments to provide adequate parking, whilst recognising the need to encourage sustainable transport choices, particularly in the most accessible locations			
Comments			
SC7 Ensure new developments are served by safe and well designed access for vehicles, pedestrians and cyclists			
Comments			
SC8 Encourage new development to incorporate passive and active energy efficiency measures and climate change resilience measures and renewable energy technologies			
Comments			
SC9 Direct development away from areas of risk of flooding, and ensure all developments are safe from flood risk and do not increase flood risk elsewhere or result in a reduction in water quality			
Comments			



SC10 Ensure new development protects and enhances wherever possible, the borough's landscapes and biodiversity interest features, providing the highest degree of protection to internationally and nationally designated areas			
Comments			
	<b>Support</b>	<b>Don't know</b>	<b>Object</b>
SC11 Maximise the contribution of new development to a comprehensive green infrastructure network across the borough			
Comments			
SC12 Control development in the Green Belt to safeguard its openness, and where possible enhance its beneficial use			
Comments			
SC13 Conserve and enhance heritage assets across the borough, supporting their continuing viable use and cultural benefits			
Comments			
<b>Theme 3 : Place Shaping</b> This chapter of the consultation document includes potential development sites, burial provision and Gypsy and Traveller accommodation			

6. Do you support or object to the following objectives that have been identified? Please cross those that apply.	Support	Don't know	Object
PS1 Identify a local target for Gypsy, Traveller and Travelling Showpeople sites and allocate sites to achieve this target			
Comments			
PS2 Ensure future cemetery and/or crematorium provision is located consistent with sustainability principles			
Comments			

	Support	Don't know	Object
PS3 Allocate sites for development across the borough consistent with the Core Strategy and sustainability principles			
Comments			
PS4 Plan for improvements to existing infrastructure and services and/or the provision of new infrastructure and services, to meet the needs created by new development			
Comments			
<p>Are there any other topic areas or subjects that the Development Management Plan should cover, or any other objectives it should include? If you want to say more than the space allows, please send an email to <a href="mailto:LDF@reigate-banstead.gov.uk">LDF@reigate-banstead.gov.uk</a></p>			

**Section 2 : This part of the survey allows you to make detailed comments on the consultation document and evidence base. Please explain which part of the document you are commenting on and give the page numbers. There is limited space and if you would like to give more feedback than the space allows, please email separately to [LDF@reigate-banstead.gov.uk](mailto:LDF@reigate-banstead.gov.uk).**

8. Please comment on Theme 1: Growing a prosperous economy, economic development and town and local centres. Please give reasons for your views.

9. Please comment on Theme 2: Building self reliant communities, including design, access and parking, open space, flooding and climate change, the natural and historic environment. Please give reasons for your views.

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10. Please comment on Theme 3: Place Shaping (Burial provision, potential development sites, Gypsy and Traveller sites). Please give reasons for your views. You can also use this box to suggest other sites.

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11. Please comment on Theme 3: Place Shaping (Infrastructure and Managing Land Supply). Please give reasons for your views.

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12. Please comment on anything else in the consultation document or evidence base you would like to.

This consultation is one stage in a longer process. The Council will use your comments to help us prepare the draft Development Management Plan. A second consultation is programmed for spring 2017 when further comments can be made on the draft Plan developed from this consultation. The Plan will then be examined by an independent planning inspector before it can be formally adopted by the Council.

We would like to collect a bit more information about you to help ensure we understand the views of different people. The following questions are optional and answers will remain confidential.

13. What is your age?				
Up to 14	15-17	18-19		20-29
30-39	40-49	50-59		60-69
70-79	80 or over	Prefer not to say		
14. What is your ethnic origin?				
Asian (Bangladeshi)	Asian (Chinese)	Asian (Indian)		Asian (Pakistan)
Asian (Other)	Black (African)	Black (Caribbean)		Black (Other)
Mixed (White & Asian)	Mixed (White & Black Asian)	Mixed (White & Black Carib)		Mixed (Other)
Other	White (Eng/Wels/ Scot/Nl/Brit)	White (Gypsy/Irish Traveller)		White (Irish)
White (Other)				
15. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?				
Yes, limited a lot	Yes, limited a little	No		Prefer not to say
16. If yes, please indicate below (tick all boxes that apply)				
Deafness/severe hearing impairment		Blindness or severe visual impairment		A condition that substantially limits one or more basic physical activities such as walking, climbing stairs, lifting or carrying
A learning difficulty		A long-standing psychological or emotional condition		Other, including any long-standing illness
17. Do you look after, or give any help or support to family members, friends, neighbours or others because of either:				
Long term physical/mental ill-health/disability				Problems related to old age
No				Prefer not to say
18. What is your religion or belief?				

Buddhist		Christian (Church of England, Catholic, Protestant and other Christian denominations)	Hindu
Humanist		Jewish	Muslim
Sikh		No religion	Other faith or belief
19. Are you?			
Female		Male	Prefer not to say
20. Is your gender identify the same as the gender you were assigned at birth?			
Yes		No	Prefer not to say
21. Which of these best reflects your sexual orientation?			
Bisexual		Gay	Heterosexual
Lesbian		Other sexual orientation	Prefer not to say



## Appendix B – Specific and General Consultation Bodies Contacted

- Department for Energy and Climate Change (now part of Department for Business, Energy, and Industrial Strategy)
- Department for Environment, Food, and Rural Affairs
- Department for Transport
- Environment Agency
- Forestry Commission
- Canal and River Trust
- Health and Safety Executive
- Highways England
- Historic England
- Natural England
- Network Rail
- Office of Rail and Road
- Southern Railway
- Sport England
- Sutton and East Surrey Water
- Thames Water
- Surrey Hills AONB Office
- Gatwick Diamond Initiative
- Transport for London
- Gatwick Airport Ltd
- East Sussex County Council
- Surrey County Council
- Mayor of London
- London Borough of Croydon
- London Borough of Sutton

- Crawley Borough Council
- Elmbridge Borough Council
- Epsom & Ewell Borough Council
- Guildford Borough Council
- Horsham District Council
- Mid Sussex District Council
- Mole Valley District Council
- Runnymede Borough Council
- Sevenoaks District Council
- Spelthorne Borough Council
- Surrey Heath Borough Council
- Tandridge District Council
- Waverley Borough Council
- Wealden District Council
- Woking Borough Council
- Betchworth Parish Council
- Bletchingley Parish Council
- Buckland Parish Council
- Burstow Parish Council
- Chaldon Parish Council
- Charlwood Parish Council
- Headley Parish Council
- Leigh Parish Council
- Newdigate Parish Council
- Nutfield Parish Council
- Outwood Parish Council
- Salfords & Sidlow Parish Council
- Reigate & Banstead Taxi Association
- Surrey Nature Partnership

- Banstead Common Conservators
- Nutfield Conservation Society
- Surrey 50+
- Surrey Chamber of Commerce
- Reigate Society
- Gatwick Area Conservation Campaign
- The Ramblers Association (Surrey and individual area groups)
- Surrey Archaeological Society
- Reigate Society of Artists
- Reigate and District Masonic Hall
- Gatwick Parking Association
- Reigate & Banstead Cycle Forum
- Reigate & Banstead Women's Aid
- Asian Society of Redhill and Reigate
- Campaign to Protect Rural England (Surrey)
- Reigate Sea Cadets
- Institute of Directors
- Diocese of Southwark
- River Mole Preservation Society
- Sustainable Redhill
- Diocese of Arundel and Brighton
- Showmen's Guild of Great Britain
- Gatwick Diamond Business Association
- Gypsy Council
- National Federation of Gypsy Liaison Groups
- South East Planning Aid
- Surrey Economic Partnership
- Reigate Business Guild
- Redhill Council of Churches

- Confederation of British Industry
- Horley Chamber of Commerce
- Redhill Islamic Centre Trust
- Redhill & Reigate Greenpeace
- Royal Society for the Protection of Birds (East Surrey)
- Gatwick Greenspace Partnership
- Reigate & Banstead Pedestrian Forum
- Surrey & West Sussex Small Business Federation
- Rotary Club (Redhill, Horley, Reigate, Reigate Hill)
- Chipstead Village Preservation Society
- Borough of Reigate & Banstead Arts Council
- Road Haulage Association
- Churches Together in Surrey
- Surrey Federation of Small Businesses
- Banstead Association for Community Support
- Horley Access Group
- Horley Methodist Church
- Mid-Surrey Mencap
- National Farmers Union Redhill Branch
- Redhill Shopmobility
- Redhill Young Business Club
- Shopkeepers Associations
- Reigate Area Conservation Volunteers
- Salvation Army Redhill
- Surrey Countryside Access Forum
- Age Concern (Banstead, Merstham, Redhill, Reigate)
- Reigate and Redhill YMCA
- 76 Residents' Associations across the borough

## Appendix C - Responses

## THEME 1

EMPLOYMENT		
<p>There is already enough employment space in and around the borough - there consistently appear to be business premises available for rental or purchase. Much needs to be done to encourage maximum usage before new projects are considered.</p>	<p>This comment is noted. The aim of the Development Management Plan is to facilitate the delivery of the growth that evidence indicates if required as far as possible, recognising that there are certain constraints to delivery. The Local Economic Needs Assessment Update Development Management Plan Evidence Paper identified the need to provide as a minimum 6,500sqm of additional industrial space, 11,000sqm of additional storage and distribution space and 25,500sqm of additional office space over the plan period across the borough. Whilst it is estimated that there is potential for at least 18,000sqm of additional employment floorspace to be met through better use of existing designated employment sites, we do need to plan for some additional employment floor space.</p>	<p>No changes.</p>
<p>Building hundreds of new homes does not ensure a prosperous local economy. People will move to the area and commute using already overloaded transport systems. There is no desperate requirement for local businesses to grow, diverse + prosper in Surrey.</p>	<p>This comment is noted. The aim of the Development Management Plan is to facilitate the delivery of the growth that evidence indicates if required as far as possible, recognising that there are certain constraints to delivery. National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. The Local Economic Needs Assessment Update Development Management Plan Evidence Paper identified the need to provide as a minimum 6,500sqm of additional industrial space, 11,000sqm of additional storage and distribution space and 25,500sqm of additional office space over the plan period across the borough. Whilst it is estimated that there is potential for at</p>	<p>No changes.</p>

	least 18,000sqm of additional employment floorspace to be met through better use of existing designated employment sites, we do need to plan for some additional employment floor space.	
<b>Banstead</b> - Banstead High Street should be maintained exclusively for retail and community support services.	This comment has been noted. The National Planning Policy Framework says that main town centre uses include retail; leisure; entertainment facilities; recreation uses; offices; and arts, culture and tourism, the local plan would not be in accordance with national policy if it were to try and restrict the uses in Banstead to only retail and community support services. However, our policies seek to ensure there is a balance of uses to maintain the viability and vitality of the High Street	No changes.
<b>Banstead</b> - No need for more jobs in Banstead, there are plenty of employment options in Croydon, Sutton, and Epsom.	This comment is noted. No significant additional employment or retail floorspace is proposed for Banstead. Some small scale commercial/retail is proposed in the centre of Banstead in line with the needs identified in the evidence papers prepared for the Development Mangement Plan; the Local Economic Needs Assessment and the Retail Needs Assessment, both 2016.	No changes.
<b>Banstead</b> - The existing high street economy in Banstead should be maintained, rather than altered.	This comment is noted. The proposals seek to support the high street economy in Banstead in line with needs identified in the evidence papers prepared for the Development Mangement Plan; the Local Economic Needs Assessment and the Retail Needs Assessment, both 2016. Only some minor, small scale additional commercial/retail floor space is proposed in the centre of Banstead.	No changes.
<b>Banstead</b> - There should be no industrial businesses in Banstead.	This comment has been noted. No industrial estates/ premises are proposed for Banstead.	No changes.

<p><b>EMP1</b> - should not refer to just industrial and dist use. what about warehouse and office use. Permitted devt allows the change subject to area restrictions. The majority of stock falls within this, So make the policy relevant and use the Use class B1 and B2</p>	<p>This comment has been noted. The Development Management Plan Employment Area Review 2016 evidence paper concluded that given the scale, accessibility and type of accommodation available, that the principal employment areas should retain an industrial/ warehouse use class and seek to strengthen clustering of B1(B), B1(C), B2 and B8 use classes (namely industrial and dist uses). In the wording of the reasons it does say that industrial and distribution businesses include warehousing, manufacturing and waste management.</p>	<p>No changes.</p>
<p><b>EMP1</b> - To ensure that the policy approach is robust and sound, the following additional wording should be added to Proposed Policy EMP1.          “Within the Principal Employment areas.....          1) Planning permission will be .....          2) Planning permission will be .....          3) Development for other uses will only be permitted where.....  <u>Outside of the Principal Employment areas development which has the potential to adversely affect the operation or employment function of the PEA will be resisted unless it has been demonstrated that the development has been appropriately planned, laid out and mitigated.”</u></p>	<p>Comment is noted. It is considered that DES11 covers this requirement, it states that "Development for new housing or other sensitive development will not normally be permitted where existing fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution are unacceptable and there is no reasonable prospect that these can be mitigated against."</p>	<p>No changes.</p>



<p><b>EMP1</b> - There is no similarly designated zone in Area 1 - it would help in the transfer of local businesses from unsuitable sites</p>	<p>This comment has been noted. The Council are not proposing to build/ create any new principal employment areas. Pitwood Park is proposed to be designated as a local employment area.</p>	<p>No changes.</p>
<p><b>EMP1</b> It is considered that additional policy wording is introduced to robustly safeguard those Royal Mail properties and other employment uses which are located outside of designated strategic employment areas against the implementation of residential development or other insensitive land uses which would be contrary to, and which do not provide direct, ongoing support to, existing business operations.</p>	<p>This comment has been noted. Proposed policy EMP4 seeks to safeguard employment land and premises but recognises that paragraph 22 of the National Planning Policy Framework says that employment premises should only be safeguarded where there is a reasonable prospect of employment use.</p> <p>For changes of use, units have to have been marketed for at least 6 months and evidence would be required to demonstrate that appropriate marketing had been undertaken, and that the proposed use would not adversely affect the efficient operation or economic function of other employment uses or businesses in the locality.</p>	<p>No changes.</p>
<p><b>EMP1- 3:</b> These three proposed policies use the wording “planning permission WILL be granted...”. I consider that this wording is extremely dangerous as it gives us no “wriggle” room. I think it should say “There will be a presumption to grant planning permission”, or words to this effect. This still leaves us the power to reject an application without an inspector saying “your DMP says you will grant planning permission”</p>	<p>All policies have been updated to reflect that where wording is that "planning permission will be granted" that this is subject adherence with other policise as well.</p>	<p>All policies have been updated to reflect that where wording is that "planning permission will be granted" that this is subject adherence with other policise as well.</p>
<p><b>EMP1</b> Surrey County Council supports the inclusion of “waste management” in the supporting text so that it is clear that waste</p>	<p>This comment has been noted.</p>	<p>No changes.</p>

management is a potentially acceptable use in such areas.		
<b>EMP2</b> - Pitwood Park fits well. In this section “industrial and distribution” is referred to again. It should be made clear when the local employment area would be more appropriate than the principal employment area. In both types of area what measures would be available to achieve concentration on these sites in the longer term?	This comment has been noted. The Development Management Plan Employment Area Review provides information on the assessment of the different level of employment area and why the policies reference the particular mix of uses and what the reasoning is for the function of the areas. The protection of these sites for the particular uses is considered sufficient to foster concentration on these sites.	No changes.
<b>EMP3</b> - Business premises in residential environment. We suggest adding an additional criterion:- e) Not have an unacceptable impact on traffic, movement and parking, and would not compromise highway or pedestrian safety in the locality;	This comment has been noted. The reason section - in line with National Planning Practice Guidance Paragraph 014 Reference ID: 13-014-20140306- says that traffic movement should be considered when determining whether home working would cause an adverse impact on the locality. In addition, policy TAP1 covers these requirements.	No changes.
<b>EMP3</b> - Summary recommendation: Insert additional wording into paragraph 1 to state that ‘planning permission will be granted for employment uses (excluding all A class uses other than A2), including the proposed change of use of existing employment uses to an alternate employment generating use class, and proposals to allow working at home...’	This comment has been noted, it is however felt to be not necessarily. Should planning permission be required for a change of use (i.e. the change of use is not a permitted development) then it would be assessed against the requirements of this policy anyway as the end result would still be employment use outside the designated areas regardless of what the previous use had been.	No changes.

<b>EMP3</b> - Existing employment land ONLY	This comment has been noted. The employment policies seek to focus economic activity within the designated employment areas, and that any town centres uses proposed outside the town centre are justified. However, proposed policy EMP3 recognises that many small businesses operate outside of these areas to save on cost/ for flexibility. It also recognises that many small businesses and new start-ups are operated from home.	No changes.
<b>EMP3</b> - The effect is to restrict use to A2, why not say so?	This comment has been noted. The intention of the proposed policy is to not promote new retail outside of designated retail areas as this is most appropriate within town centres as per national guidance but recognises that some A2 uses outside of designated employment areas and town centres (subject to other policies) could be appropriate. The policy also covers other employment uses as well such as offices. Any proposal would still have to adhere to policies which require evidence that town centres uses cannot be accommodated within town centres.	No changes.
<b>EMP3</b> - with 'home working' there are dangers of intensification of the use. There is a need for robust guidelines and parameters to be established in respect of business activities in residential premises, to ensure they do not become too large or change to an unacceptable use. These parameters should be used as criteria for initial assessment of business proposals and for ongoing monitoring of such activities, with a commitment to firm enforcement where activities deviate from agreed guidelines.	This comment has been noted. Proposed policy EMP3 seeks to outline policy requirements for home working. This is inline with National Planning Practice Guidance Paragraph 014 Reference ID: 13-014-20140306 which says that planning permission is not required providing that no unacceptable harm is caused and the use remains ancillary to the residential use. It is therefore not possible to initially assess premises for home working before activities are carried out. Reigate & Banstead Borough Council's enforcement team will however thoroughly investigate reports of unacceptable practices.	No changes.

<p><b>EMP4</b> - 1) Starts off the loss of employment land WILL only be permitted if... I consider this should be changed to the loss of employment land and premises may be permitted etc.</p>	<p>This comment has been noted. All policies have been updated to reflect that where wording is that "planning permission will be granted" that this is subject to adherence with other policies as well. It is felt that 'will' is appropriate because it reflects national policy which says that land and premises should only be protected if there is a reasonable prospect of employment use.</p>	<p>All policies have been updated to reflect that where wording is that "planning permission will be granted" that this is subject to adherence with other policies as well.</p>
<p><b>EMP4</b> - object to the phrase in 1(a) in the 'immediate or longer term'. The word 'immediate' should be removed as is far too weak. the possible outcome of the proposed policy approach EMP4 could be the opposite. If adopted, this aspect of the DMP has the potential to encourage private landlords of older and more affordable commercial premises to end the leases of their existing business tenants or offer only short term leasing.</p>	<p>This comment has been noted. The immediate or longer term reference has been removed from the policy and the marketing requirements have been amended to provide a more thorough requirement for marketing evidence.</p>	<p>Remove "in the immediate or longer term" and amend marketing requirements</p>
<p><b>EMP4</b> - to include reference to live-work developments (p20). Employment land is still required and less is proposed to be safeguarded in the plan. Sites proposed to switch from employment use to housing include the Hockley Business Centre in Hooley Lane, Redhill. These areas should be encouraged as live-work development areas.</p>	<p>Policy EMP4 recognises the need to safeguard viable employment premises, but also recognises national planning policy which says that existing employment premises should only be safeguarded when there is a reasonable prospect of employment use. Should changes of use be proposed, evidence would be required that the unit has been marketed for 6 months, that the unit has been marketed appropriately and that the proposed use would not adversely affect the efficient operation or economic function of other employment uses or businesses in the locality.</p> <p>Live-work units was first developed in the 1990s. By the</p>	<p>No changes.</p>

	<p>early 2000s the same Borough's started to draw back their provisions. Live-work enabled developers to side-step the employment promotion and affordable housing policy requirements that would otherwise have to be met. National Planning Practice Guidance recognises that there has been an increase in the number of people working from home. Various policies, such as DES1 and TAP1 will provide the parameters for controls on working from home.</p> <p>The DMP proposes a mixed-use development of residential and employment uses for Albert Road North, it is not intended that these are brought forward as live-work units. Hockley Business Centre has been removed from the Regulation 19 version as this has now obtained planning permission. It was considered acceptable upon the basis that the applicant has provided a robust justification for redundancy of the current use and the lack of a viable commercial redevelopment prospect.</p>	
<p><b>EMP4</b> - "It can be clearly demonstrated....etc." In my opinion this needs to be tighter. It is very easy to demonstrate that a property has been advertised but with no suitable response. So it needs to say something like "that the property, unit has been advertised at affordable market rent (or sale price) and provide such evidence in writing.</p>	<p>This comment has been noted and amendments will be made to marketing requirements to reflect this comment and others made.</p>	<p>Amend marketing requirements</p>

<p><b>EMP4</b> - paragraph 51 of the NPPF. Objective PE1 should seek to safeguard the principal and local employment areas only. There are a number of employment premises which do not need safeguarding as they are either in an inappropriate location or unviable. Accordingly policy approach EMP4 should include an additional exception for when the use is in an unsuitable location.</p>	<p>This comment is noted. Policy EMP4 seeks to safeguard all viable employment land in line with national policy.</p> <p>It is felt that this should safeguard all viable employment land - not limited to principal and local employment areas - as all employment land/ development fulfils a role within the borough. Should a change of use be proposed, marketing evidence is required to demonstrate that the property is unviable. Should the unit be in an unsuitable location, this would be raised through the marketing evidence/ other evidence provided.</p>	<p>No changes.</p>
<p><b>EMP4</b> - It is crucial that flexibility is embedded to ensure that the policies are not overly restrictive and do not protect the wrong sites from redevelopment. It is important that existing employment land is offered a level of protection to ensure sufficient space and accommodation for the Borough's economy to grow and diversify as necessary. However, policy needs to take account of the fact that not all existing employment land and premises are suitable for modern business and enterprise and as such it may be that redevelopment for other uses is appropriate. In this regard we question whether the evidence base that sites behind this objective is robust enough. In particular it would appear that there has been no up to comprehensive assessment of the Borough's employment stock. The Economic Evidence Base Update is now 5 years out of date and therefore does not provide an update to date position and</p>	<p>This comment has been noted. Proposed policy EMP4 (now EMP3) recognises the need to safeguard existing employment premises but that some of the existing employment premises in the Borough do not meet modern requirements and national planning policy which says that employment premises should only be protected if there is a reasonable prospect of employment use. Marketing evidence would be required to demonstrate that the premises are no longer viable - details of what would be required to demonstrate this have been extended in the Annex.</p> <p>In order to inform the emerging Development Management Plan, the Council updated the Local Economic Needs Assessment, this is available on the Council's website. Both the updated Local Economic Needs Assessment and the Employment Area Review provide the evidence base for the employment policies.</p>	<p>Amend marketing requirements</p>

<p>the Employment Area Review of 2016 does not appear to provide a comprehensive analysis of exactly what existing businesses need, whether their current needs are met and how future needs need to be planned for.</p>		
<p><b>EMP4</b> - keen that the marketing of the site is carried out professionally, ensuring that prices and terms are reasonable and not just a ploy to get a quick change of use. Perhaps the Reason could include an explanation of what is considered to be an acceptable standard of marketing.</p> <p>The reason for our concerns is that employment land will be lost. We understand that the Legal and General site in Kingswood is being marketed at £70 million which assumes residential development, without first being advertised for employment purposes. We are concerned that if another large international company wishes to locate in the Borough, providing valuable high quality employment, the Council will be likely to allow development in the Green Belt if it has allowed all the large employment sites such as the two in Kingswood to go for housing.</p> <p>As it is contrary to current policy, we trust that the Council has not acquiesced with the marketing campaign on the Legal and General site. We assume they will have had discussions with Council officers which is very disconcerting.</p>	<p>Proposals for changes of use would be required to demonstrate marketing evidence. It is proposed to amend the marketing comments to reflect the need for evidence that the property has been advertised at an appropriate rent/ sale price, without success, including evidence of enquiries and follow up.</p> <p>This proposed policy recognises that there is a need to safeguard employment premises but also recognises national planning policy which says that premises should only be safeguarded if there is a reasonable prospect of employment use. Evidence will be required that the unit is no longer viable. It is proposed that the marketing comments are amended to include evidence that the unit has been vacant for at least 6 months, that it has been marketed at an appropriate rent/ sale and that enquiries have been followed up.</p> <p>The Council has had no direct involvement with the Legal and General site.</p>	<p>Amend marketing comments.</p>

<p><b>EMP4 - Re Part 1):</b> it is assumed that there will be separate guidance provided for developers setting out the type of evidence that they are required to produce in order to demonstrate there is no prospect of the retention or redevelopment of employment sites for employment use. The methodology by which commercial land is assessed for long term viability needs to be established as does the visibility and transparency of the process and outcome of any such assessment.</p>	<p>This comment has been noted. It is proposed that amendments are made to the marketing requirements detailed in proposed policy EMP4 to reflect this comment and others made to reflect the need for a robust justification for loss of commercial land.</p>	<p>Amend marketing comments.</p>
<p><b>EMP4 -</b> does not fully accord with the NPPF, as it seeks to safeguard all employment sites, whether designated for such use or not - at odds with para 22 of the NPPF, which specifies that planning policies should avoid the long term protection of sites allocated for employment use. Furthermore, with reference to criteria 1b, it is stated that loss of employment land and premises will only be permitted if the loss of employment floorspace is necessary to ‘enable a demonstrable improvement in the quality and suitability of accommodation’. However, it is not explicitly clear what type of ‘accommodation’ this relates to.</p>	<p>This comment has been noted. The policy seeks to safeguard existing viable employment space but recognises that land and premises should only be protected where there is a reasonable prospect of employment use. For changes of use away from employment, appropriate evidence that the site is no longer viable for employment uses is required.</p> <p>In terms of 1b this is a proposed employment policy and therefore relates to employment accommodation. This proposed policy is applicable to all employment development, not only those in designated employment areas and town centres, as it is recognised that small independent warehouses and smaller industrial areas also provide valuable employment floorspace.</p>	<p>Update to make clear that reference to accommodation is employment accommodation</p>



<p><b>EMP4</b> - We suggest use of word 'land' instead of 'development' in the phrase 'employment development'.</p>	<p>This comment has been noted. Policy EMP4 seeks to safeguard employment land and premises. It says that 'the loss of employment land and premises will only be permitted if ...'. The policy is proposed to be applied to 'all employment development' as this seeks to ensure that land/ buildings/ etc. are safeguarded unless the unit is no longer viable, the loss of floorspace is necessary to enable a demonstrable improvement in the quality and suitability of accommodation and will not adversely affect the efficient operation or economic function of other employment uses. As such, it is felt that 'development' is more appropriate wording as it relates to the development of the employment land.</p>	<p>No changes.</p>
<p><b>EMP8</b> - "help "means supporting economic growth and flexible uses to enable business to adapt. It does not mean creating more red tape and planning conditions that are hard to enforce. If business is thriving it does not need the local authority trying to get involved in creating apprenticeships. This is unnecessarily bureaucratic and in practical terms unenforceable. Building apprenticeships are way beyond the Council's brief and competence. Application of this policy will create pointless paperwork and delay development.</p>	<p>This comment has been noted. The provision of apprenticeships is already commonplace amongst house builders/ contractors and in line with other local authorities approaches. Proposed policy EMP8 (now EMP5) seeks to ensure the provision of apprenticeships on a local basis but does not prescribe the mechanism through which the developer should secure these thus not introduce additional costs or red tape.</p> <p>It is appreciated that planning conditions are hard to enforce, however the Council would require developers/ contractors to sign and implement a Training and Employment Plan. The proposed policy is in line with other local authorities approaches.</p>	<p>No changes.</p>

<p><b>EMP8</b> - Apprenticeship policy needs more clarity - if the development is finished before the apprenticeship, does the developer have to keep the apprentice on? If not, are the experience and skills gained from working on a single site enough to qualify as an effective apprenticeship? Do the developers still need to take on more apprentices on other sites even if the apprentice from the previous site hasn't finished yet? How will the policy be monitored?</p>	<p>(EMP8 is now EMP5) This comment is noted. Provision of apprenticeships is already commonplace among house builders/ contractors. This proposed policy seeks to secure this on a local basis but does not prescribe the mechanism through which the developer should secure this.</p> <p>The policy will be monitored through requiring developers and contractors to agree to and implement a Training and Employment Plan demonstrating how the development will deliver apprenticeships.</p>	<p>No changes.</p>
<p><b>EMP8</b> - Apprenticeships should be approved and certificated and commitments made to complete the training beyond the duration of the development. The document implies that when the development is non-residential the developer has a commitment to ensure that training is available locally for people who eventually work there. It is not clear that this is feasible or reasonable. An example might make this point more clearly. A developer builds a factory that is occupied on completion by another company. Who should bear the training responsibility, the developer, the first occupier of the factor or the borough to which the commitment was made?</p>	<p>This comment has been noted. The delivery of development in the Borough provides an employment opportunity for Borough residents and can help provide local people with the skills necessary both to fulfil the needs of local business and to make the most of job opportunities available.</p> <p>The provision of apprenticeships and training is already commonplace amongst housebuilders and contractors. Proposed policy EMP8 (now EMP5) seeks to secure this on a local basis but does not prescribe the mechanism through which the developer should secure these, thus not introduce additional costs. For non-residential development, developers will be required through the Training and Employment Plan to demonstrate how the development will provide or support training and placement schemes through the end use. This document would outline who would have responsibility, it is felt that this could differ between schemes and therefore there is no need to stipulate this level of detail in the policy.</p>	<p>No changes.</p>

<p><b>EMP8</b> - Does the term “apprenticeship” need to be more explicitly defined, in policy or guidance, so that it is clear what is required from developers – for example reference to a national standard?</p>	<p>(EMP8 is now EMP5). This comment has been noted. It is not felt that there is a need to define the term apprentice. Provision of apprenticeships is already commonplace amongst house builders/ contractors and this proposed policy seeks to secure this on a local basis.</p>	<p>No changes.</p>
<p><b>EMP8</b> - I am unconvinced that large numbers of additional houses will improve recruitment for existing local firms. I suspect that they will simply increase the number of more distant commuters (e.g. to London). Commuter congestion makes it difficult for local people and does not attract new talent to the area.</p>	<p>This comment has been noted. Policy EMP8 (now EMP5) seeks to secure local skills and training opportunities for local people on new developments, through for example securing apprenticeships on large residential and non-residential developments. For non-residential schemes there is a requirement to provide or support local training and placement schemes targeted at local residents in respect of any jobs created through the end use.</p> <p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to understand potential needs with regards to the development proposed in the Regulation 18 Development Management Plan. Health, education and transport evidence papers are available on the Council's website.</p>	<p>No changes.</p>
<p><b>EMP8</b> - Main concern with this objective is the implicit assumption that new development equates to new jobs and skills which local people will either desire or be willing to acquire. This is a dilemma that needs to be addressed at a higher level of government than local council, where welfare state and financial benefits in relation to employment/unemployment need to be reformed</p>	<p>(EMP8 is now EMP5). This comment has been noted. Proposed policy seeks to create opportunities within the parameters of local governments remit. This policy seeks to secure local skills and training opportunities for local people on new developments, through for example securing apprenticeships on large residential and non-residential. For non-residential schemes there is a requirement to provide or support local training and placement schemes targeted at local residents in respect of any jobs created through the end use.</p>	

<p><b>EMP8</b> - Must be meaningful jobs though - apprenticeships are great idea, but can't be allowed to be a box-ticking exercise for the suppliers</p>	<p>(EMP8 is now EMP5). This comment has been noted. Proposed policy seeks to secure local skills and training opportunities for local people on new developments, through for example securing apprenticeships on large residential and non-residential. For non-residential schemes there is a requirement to provide or support local training and placement schemes targeted at local residents in respect of any jobs created through the end use.</p>	<p>No changes.</p>
<p><b>EMP8</b> - requires a Training and Employment Plan on developments above a threshold of 25 units or 1,000m<sup>2</sup>. It is not clear in the policy how this will work or be monitored – i.e. if the requirement will be secured by condition or whether it will be required as part of an application and the local validation list updated. Whilst many house builders and contractors have apprenticeship schemes some smaller developers may not and this could be too much of a burden on them. The policy should recognised paragraph 21 of the NPPF which states that “Investment in business should not be over-burdened by the combined requirements of planning policy expectations.”</p>	<p>This comment has been noted. Proposed policy EMP8 (now EMP5) is in line with other authorities approaches. The Training and Employment Plan would be required through a condition.</p> <p>The policy seeks to secure local skills and training opportunities on new developments, this is already commonplace amongst house builders/ contractors. The proposed policy seeks to secure this on a local basis but does not prescribe the mechanism through which they developer should secure these, thus not introducing additional costs.</p>	<p>No changes.</p>
<p><b>EMP8</b> - requires developers of major new developments to agree with the Council, and implement, a Training and Employment Plan demonstrating how the development will provide or enable the delivery of new construction apprenticeships and other on-site training opportunities. This is welcomed by Croydon and is similar to the criteria and requirements of the proposed Skill and Employment Section in Croydon's proposed non statutory section 106 and</p>	<p>(Policy EMP8 is now EMP5) This comment is noted.</p>	<p>No changes.</p>

community infrastructure levy guidance		
<p><b>EMP8</b> - The addition of more jobs would be supported if it can be ensured that they will be for local people.</p>	<p>This comment has been noted. It is not possible to ensure that new jobs in general will be for local people. Proposed policy EMP8 (now EMP5) however seeks developers of new residential development of 25 or more units and non-residential development in excess of 1,000sqm to provide apprenticeships. It also seeks for non-residential schemes that local training and placement schemes targeted at local residents in respect of any jobs created will be provided or supported as part of the development.</p>	<p>No changes.</p>
<p><b>EMP8</b> - The training scheme sounds like a good idea. However what happens if the apprentice(s) leave or just do not fit? Is the employer obliged to replace him/her? If the answer is yes should not the policy say so?</p>	<p>(Policy EMP8 is now EMP5). This comment has not been noted. The provision of apprenticeships is already commonplace amongst house builders/ contractors. The proposed policy seeks to secure this on a local basis but does not prescribe the mechanism through which the developer should secure this, this would be agreed through a Training and Employment Plan which would be required as a condition.</p>	<p>No changes.</p>

<p><b>EMP8</b> - This policy is problematic. In sub section (a): The opportunities for training must be continuous so that they are sustainable beyond the end of the particular development project. How long are the apprenticeships and at what level, would they be accredited? In sub section (b): training opportunities are provided for employment at the conclusion of a development project. It appears that the developer of, say a factory, would have an obligation to assure the training local people who would be employed in the factory. Once built, the developer would no longer be involved; it would be the occupying business that had the training responsibility. Who would the responsibility rest with, the developer or user? How would this to be managed, would this mean that the Borough had a responsibility for the provision of training? Greater clarity is needed here</p>	<p>This comment has been noted. New development provides the opportunity for local residents to secure local skills and training opportunities. The proposed policy is in line with other authorities approaches. The provision of apprenticeships is already commonplace amongst house builders/ contractors. The proposed policy seeks to secure this on a local basis but does not prescribe the mechanism through which the developer should secure this, this would be agreed through a Training and Employment Plan which would be required as a condition.</p>	<p>No changes.</p>
<p><b>EMP8</b> - This policy seeks to exercise a level of control over the operation and staffing of private companies. This is not considered to be acceptable and is an example of the Local Authority going beyond their remit. We also question how such a policy can be enforced legally.</p>	<p>(Policy EMP8 is now EMP5). This comment has not been noted. The proposed policy is in line with other authorities approaches. The provision of apprenticeships is already commonplace amongst house builders/ contractors. The proposed policy seeks to secure this on a local basis but does not prescribe the mechanism through which the developer should secure this, this would be agreed through a Training and Employment Plan which would be required as a condition.</p>	<p>No changes.</p>
<p><b>EMP8</b> - Though I've yet to see any such proposals to favour locals actually be implemented. They look nice on paper, but suspect rabbi has no way of being able to implement them.</p>	<p>This comment has been noted. Proposed policy EMP8 (now EMP5) requires developers of new residential developments of more than 25 units or 1,000sqm or more of non-residential floorspace to agree with the Council and</p>	<p>No changes.</p>

	implement a Training and Employment Plan demonstrating how they will provide apprenticeships and/ or training for local residents.	
<p><b>EMP8</b> - We support the principle behind this policy, but foresee problems in administering an apprenticeship scheme of this type.</p> <p>What happens once the development is complete? Is it reasonable to expect a firm to continually take on more long term apprentices for each project? For example, with projects of say 25 units taking 18 months, an apprentice will not have completed his apprenticeship. Will he be kept on to work on another site even though the builder is required to take on more new apprentices?</p> <p>How will the policy be monitored, either on site or when the developers have moved on to another site? Will it be a matter of just a signed agreement? The reason for our comment is that the policy needs clarification on how it will operate. It has to be well understood by developers and capable of implementation. Presumably there may some impact on the viability of a scheme</p>	<p>This comment is noted. Proposed policy EMP8 (now EMP5) seeks to ensure that these schemes are implemented through requiring contractors and developers to sign and implement a Training and Employment Plan, which will be required by a condition on any planning permission.</p> <p>The provision of training facilities and apprenticeships is already commonplace amongst house builders/ contractors. This proposed policy seeks to secure this on a local basis but does not prescribe the mechanism through which the developer should secure this, thus need not introduce additional costs.</p>	No changes.
<p><b>Employment Areas</b> - More locations should be designated as principal or local employment sites.</p>	<p>This comment has been noted. The Development Management Plan assessed all of the existing employment areas designated in the existing local plan as principal or local employment sites, it is not considered there are any other suitable locations.</p>	No changes.
<p><b>Employment Areas</b> - New start-up businesses should be directed to business parks.</p>	<p>This comment has been noted. It is however felt that new start-up businesses should not be only directed to business parks. Many new enterprises are started at home as they may be part time businesses/ small-scale/ to save on costs/ to reduce risk factors/ to fit in with family life. The</p>	No changes.

	Development Management Plan does however propose that some of the allocated development include incubator space/small workshops to support small businesses should they want separate affordable work space	
<p><b>Employment Areas</b> - In relation to the 'principal employment centres,' we would like to see more existing industrial/ commercial estates, if environmentally satisfactory, to be reserved for employment purposes, and that permitted development rights for change of use to residential removed.</p> <p>The reason is that low cost accommodation should be reserved for start ups and small firms in order to provide a choice of employment opportunities to local residents. There is a danger that the current balance of land uses will be lost to</p>	<p>This comment has been noted. The Employment Area Review Development Management Plan evidence paper reviewed all the existing borough employment areas.</p> <p>Article 4 does not ensure that the land does not revert to housing, rather it removes permitted development rights. Planning permission could still be applied for changes of use, and if marketing evidence could be provided that the unit is no longer viable and that it would not adversely affect the efficient operation or economic function of other employment/ business uses in the locality, would be granted.</p> <p>Proposed policy EMP3 recognises that many small businesses including new start-ups operate outside of existing employment areas and seeks to guide such development. In addition, some of the proposed site allocations include reference to providing space for smaller businesses</p>	No changes.
<p><b>Accommodation quality</b> - Existing employment land and premises for business should be maintained in good order to attract new business to the area. Specifically in Redhill, there are already mainly office buildings with 'To Let' signs, raising concern that not enough is being done to attract new business to occupy existing premises</p>	<p>This comment has been noted. Whilst business operators can be encouraged to maintain their premises in good order, this isn't something that can be enforced through the Development Management Plan. Proposed policy DES1 seeks to ensure that new premises are of a high quality design. Other departments in the Council (such as the economic prosperity team) work with and support businesses.</p>	No changes.



<p><b>Gatwick/Horley</b> - The Council needs to "tap into Gatwick" and benefit from its growth rather than moan about the airport. I want to see Horley expand and prosper. I want to encourage industrial development. I want Reigate and Banstead to encourage Gatwick Airport to expand.</p>	<p>This comment has been noted. Please refer to the proposed site allocations for Horley.</p>	<p>No changes.</p>
<p><b>Holmethorpe Industrial Estate</b> - better road access to the Holmethorpe industrial estate from Frenches Road must be provided. The reality is that many users of the estate will travel this way rather than on the new link road.</p>	<p>This comment has been noted. It is however not something that can be dealt with through the DMP.</p>	<p>No changes.</p>
<p><b>Horley</b> - Horley does not need extra employment space due to its proximity to London, Crawley, Croydon, Horsham etc.</p>	<p>This comment has been noted. National policy requires Local Planning Authorities, through their evidence base for their Local Plans, to assess the need for land and floorspace for economic development for all foreseeable types of economic activity over the plan period. National policy also requires planning polices to aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p> <p>The Employment Area Review 2016 identifies that additional employment floor space will be required across the borough and the Development Management Plan proposes a number of sites across the whole borough in order to meet this need.</p> <p>In terms of the potential Strategic Employment Site identified in the Development Management Plan, the evidence paper "Advice on the scope for a Strategic Employment Site within Reigate &amp; Banstead" identified the key principles for the location of a strategic employment site within the borough</p>	<p>No changes.</p>

	<p>taking into account market realities and wider policy and economic objectives. The report considered a number of factors such as the proximity to Gatwick Airport being a major attractor; a strategic employment site would require a high profile location and should benefit from excellent connectivity including strategic road, rail and public transport access; and that any site should align with wider economic objectives, including LEP priorities which seek to focus strategic growth on the 'heart of the Gatwick Diamond area', and was concluded that the land within the south of the Borough, particularly Horley, represented the optimal search area for a Strategic Employment Site. Further work was then undertaken (Strategic Employment Provision Opportunity Study) to identify the site proposed in the Regulation 18 Development Management Plan. A further study (Strategic Employment Site: Economic Assessment Task 1 and 2) has since been undertaken which further supports this.</p>	
<p><b>Horley</b> - Despite a good rail line to London and the M25 and Gatwick Airport, Horley does not seem able to attract major business compared to London or Croydon.</p>	<p>This comment has been noted. EMP1 - EMP3 all aim to provide the flexibility for employment space to be extended/amended to support businesses needs. The proposed employment site (HOR9) aims to attract major businesses to Horley.</p>	<p>No changes.</p>
<p><b>Horley</b> - This isn't all about new business - instead RBBC are flooding even more new housing onto Horley without giving sufficient thought even to infrastructure.</p>	<p>This comment is noted. National policy requires Local Planning Authorities, through their evidence base for their Local Plans, to assess the need for land and floorspace for economic development for all foreseeable types of economic activity over the plan period. National policy also requires planning polices to aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p>	<p>No changes.</p>

The Employment Area Review identifies that additional employment floor space will be required across the borough and the Development Management Plan (DMP) proposes a number of sites across the whole borough in order to meet this need.

National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. The DMP seeks to direct this housing to the most suitable locations taking account of strategic infrastructure needs. If we do not hit our targets then developers are more able to justify developments in less preferable locations.

Reigate & Banstead Borough Council have worked with Surrey County Council Transport Planners in order to understand the potential impact of all the proposals within the document. The findings are detailed in the Transport Assessment available on the Council's website. The Infrastructure Delivery Plan also sets out details on other infrastructure such as school and utilities etc. This has enabled specific requirements to be attached to proposed site allocations to ensure impacts are mitigated.

<p>Conversion of brownfield sites and commercial property to meet need for housing is much better than encroaching on green field sites. The existing empty employment land and premises should not be ring fenced and be converted into houses, flat or apartments for people to live in, rather than developing Green Belt</p>	<p>This comment is noted. Paragraph 37 of the National Planning Policy Framework says that local authorities should plan for a balance of land uses within their area. There is therefore a need to plan for housing and employment. National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. The DMP seeks to direct this housing to the most suitable locations taking account of strategic infrastructure needs and has an urban area first approach. However, we can not force landowners to develop brownfield sites, although we encourage this by allocating sites in the DMP and the Strategic Housing Land Availability Assessment.</p> <p>Policy EMP4 seeks to safeguard viable employment premises - if it can be demonstrated that a unit is no longer viable then a change of use (for example to residential) will be permitted.</p> <p>The DMP proposes a number of sustainable urban extensions and town centre opportunity sites. It is intended that the town centre opportunity sites come forward before the urban extensions, and these only come forward if and when we no longer have a 5 year housing supply.</p>	<p>No changes.</p>
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<p><b>Impact on existing community</b> - creating additional facilities will increase the demand for labour hence further housing requirements. We are reaching saturation in this regard - I agree with a prosperous economy but not at the expense of community or lifestyle of existing residents. There should be a fair balance between economy and community.</p>	<p>This comment has been noted. Both the National Planning Policy Framework and National Planning Practice Guidance direct authorities, through their evidence base for their Local Plans, to assess the need for land and floorspace for economic development for all foreseeable types of economic activity over the plan period. The Employment Area Review identifies that additional employment floor space will be required across the borough and the Development Management Plan (DMP) proposes a number of sites across the whole borough in order to meet this need.</p> <p>Reigate &amp; Banstead Borough Council have worked with Surrey County Council Transport Planners in order to understand the potential impact of all the proposals within the document. The findings are detailed in the Transport Assessment available on the Council's website. The Infrastructure Delivery Plan also sets out details on other infrastrucutre such as school and utilties etc. This has enabled specific requirements to be attached to proposed site allocations to ensure impacts are mitigated.</p>	<p>No changes.</p>
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<p>EMP4 - A housing development permitted in the Albert Road North Industrial Estate has not fulfilled the above points. 1. There were existing thriving businesses on the site and the stated reason for allowing the change of use from 'redundant office space' was inaccurate. 2. The development has severely adversely affected the operation of the adjoining business and will continue to do so. I visit businesses on the estate and thus have observed the effects.</p>	<p>This comment has been noted. Proposed policy EMP4 seeks to ensure that future developments do not lead to the loss of viable floorspace and not adversely affect the efficient operation or economic function of other employment uses or businesses in the locality.</p> <p>A significant material consideration in determining the Albert Road North application was that the majority of the site was in office use and prior approval would allow conversion of offices to residential. Consideration had to be given to whether it was preferable for this residential use to be accommodated within the existing buildings or in new purpose-built development. Consideration also had to be given to the pre-amble to policy Em8 of the 2005 Borough Local Plan which states that the Council will critically assess proposals for redevelopment and expansion at the Albert Road North Estate and in certain cases may prefer redevelopment for residential use.</p>	<p>No changes.</p>
<p>Land should be used for schools, hospitals, and social housing rather than employment space.</p>	<p>This comment is noted. Paragraph 37 of the National Planning Policy Framework says that local authorities should plan for a balance of land uses within their area. The Employment Area Review identifies that additional employment floor space will be required across the borough and the DMP proposes a number of sites across the whole borough in order to meet this need.</p> <p>Schools, hospitals and social housing are also planned for in the DMP</p>	<p>No changes.</p>

<p><b>Low - unemployment</b> Unemployment is negligible in the borough. Growth should be organic from within the borough minimising the potential impact on the borough's already over burdened infrastructure</p>	<p>This comment is noted. Whilst there may be properties available to rent/ purchase now, there is a need to plan for the duration of the plan period. Paragraph 37 of the National Planning Policy Framework says that local authorities should plan for a balance of land uses within their area. The Development Management Plan Local Needs Assessment identified a need to provide as a minimum 6,500sqm of additional industrial space, 11,000sqm of additional storage and distribution space and 25,500sqm of additional office space over the plan period. It however recognised that at least 18,000sqm of additional employment floorspace could be met through better use of existing designated employment sites. Reigate &amp; Banstead Borough Council have worked with Surrey County Council Transport Planners in order to understand the potential impact of all the proposals within the document. The findings are detailed in the Transport Assessment available on the Council's website. The Infrastructure Delivery Plan also sets out details on other infrastrucutre such as school and utilities etc. This has enabled specific requirements to be attached to proposed site allocations to ensure impacts are mitigated.</p>	<p>No changes.</p>
<p><b>Need -</b> We note that the Local Economic Needs assessment Update (2016) proposes a minimum of 6,500sqm of additional industrial space and 11,000 sqm of additional storage and distribution space. It would appear that some of this will be located in the new site to the south of Horley but we assume much of this new business park will be developed for office use. It is not clear how much existing occupied commercial floorspace will have to be vacated in order to redevelop for housing and what</p>	<p>This comment has been noted. To inform the DMP, the Council reviewed all existing employment areas in the borough and the local economic needs assessment. This identified the need for a minimum of 6,500sqm of additional industrial space, 11,000sqm of additional storage and distribution space and 25,500sqm of office floorspace. The Local Economic Needs Assessment Development Management Plan Evidence Paper concluded that at least 18,000sqm of additional employment floorspace could be met through better use of existing designated employment</p>	<p>No changes.</p>

will be the net loss of employment land. We query the need for additional floorspace on the Horley site bearing in mind the vacant floorspace which will be available on the Legal and General and Fidelity sites in Kingswood and the amount of existing employment land proposed for housing .

sites. In addition to the proposed Strategic Employment Site, it is concluded that opportunities for new office development exist within the borough's town centres, particularly Redhill. In order to inform the allocation of a strategic employment site, initial advice was commissioned regarding the potential for strategic employment provision (Advice on the scope for a Strategic Employment Site within Reigate & Banstead) which identified the key principles for the location of a strategic employment site within the borough taking into account market realities and wider policy and economic objectives. The report considered a number of factors such as the proximity to Gatwick Airport being a major attractor; a strategic employment site would require a high profile location and should benefit from excellent connectivity including strategic road, rail and public transport access; and that any site should align with wider economic objectives, including LEP priorities which seek to focus strategic growth on the 'heart of the Gatwick Diamond area', and it was concluded that the land within the south of the Borough, and particularly Horley, represented the optimal search area for a Strategic Employment Site. Further work was then undertaken (Strategic Employment Provision Opportunity Study) to identify the site proposed in the Regulation 18 Development Management Plan.

With regards to the Legal and General and Fidelity sites in Lower Kingswood neither fulfil the requirements for a Strategic Employment Site. Both are also of head quarter style office complexes, have poor transportation links and limited opportunities for further expansion. Permitted development rights would allow the conversion of this facility from office to residential.

The DMP does not propose significant redevelopment of



	<p>employment areas within the borough for housing. It identifies the potential to redevelop Albert Road North into a mixed use employment and residential area with a focus on small business/ incubator space and comprising a mix of offices and small workshops; Hockley Business Centre (which has obtained planning permission now) demonstrated that the existing employment uses were no longer viable; and Kingswood station (which has also obtained planning permission) as the Employment Area Review concluded that there were a number of constraints and that it makes a limited contribution to the employment stock.</p> <p>Proposed policy EMP4 seeks to safeguard employment land and premises within the Borough, but recognises that paragraph 22 of the National Planning Policy Framework says that such land and premises should only be protected if there is a reasonable prospect of employment use. Evidence would be required that the land/ premise has been marketed for 6 months, that marketing evidence demonstrates that the unit is no longer viable and that the proposed use would not adversely affect the efficient operation or economic function of other employment uses/ businesses in the locality.</p>	
<p>No existing businesses should be forced to move. However ossifying land use categories can be unhelpful for the further economic development of both existing and new businesses. There needs to be a highly pragmatic flexibility in the planning system that delivers results rapidly.</p>	<p>This comment has been noted. The proposed policies seek to be flexible. For example proposed policy EMP4 seeks to only safeguard viable premises and where it can be demonstrated that the premise is no longer viable for employment uses will permit changes of use. Marketing requirements have been updated to be more robust. Similarly proposed policy EMP3 seeks to allow home working and the provision of employment uses outside designated areas providing no harm is caused.</p>	<p>No changes.</p>

<p><b>PE1</b> - Redhill is a transport hub and thus needs to expand economically</p>	<p>This comment has been noted. The 2008 Economic Market Assessment identified the need to expand office provision in Redhill alongside the town's regeneration. The Development Management Plan Local Economic Needs Assessment Update (2016) identified the potential to deliver approximately 8,000sqm of employment floorspace at Gloucester Road Car Park, the Royal Mail depot and Reading Arch Road.</p>	<p>No changes.</p>
<p><b>PE1</b> - This is complex issue. While local employment is important, given that Reigate and Banstead are within commuting distance of the London Area. There needs to be a balance between the need of business and the housing needs of the local population.</p>	<p>This comment has been noted. Proposed objective PE1 seeks to improve provision within the existing principal and local employment areas, allow the development of employment spaces outside designated areas where it can be demonstrated that it will not cause a significant impact, and safeguard viable employment spaces. Where changes of use are proposed for other uses, including housing, marketing evidence will be required to illustrate that the unit is no longer viable.</p>	<p>No changes.</p>
<p><b>PE1</b> - Yes and curate those spaces, making sure we have a range of employment and training opportunities.</p>	<p>This comment has been noted. Policy EMP5 seeks to provide apprenticeship and training opportunities. Policy EMP3 recognises that small and new businesses may not wish to locate themselves within existing employment areas and therefore allows homeworking and the employment uses in areas which are not designated as employment areas, providing no harm to the surrounding area. Policy EMP4 seeks to safeguard viable employment premises. In order to continue to make these areas appealing, proposed policies EM1 and EMP2 seek to allow planning permissions for extensions and appropriate changes of use within the principal and local employment areas.</p>	<p>No changes.</p>

<p><b>PE2</b> - I think this flexibility exists already</p>	<p>This comment has been noted. Given national policy changes which have introduced a more flexible permitted regime, it is felt that the existing borough policies need to be made more flexible. Flexibility is intended to be provided through for example allowing employment development outside designated areas providing no harm will be caused.</p>	<p>No change.</p>
<p><b>PE2</b> - In anticipation of acceptance by national government of the importance of a circular economy, adequate provision should be made to locate new and innovative re-use and recycling businesses serving both local and national needs.</p>	<p>This comment has been noted. Proposed policy EMP1 outlines that waste facilities are an appropriate use for Principal Employment Areas.</p>	<p>No changes.</p>
<p><b>PE2</b> - In principle it sounds ideal but lacking in any details</p>	<p>This comment is noted. This proposed objective relates to proposed policies EMP1-5 which provide more detail.</p>	<p>No changes.</p>
<p><b>PE2</b> - It is very important that flexibility is built into planning policy which supports the growth of local business. should be flexibility, but within controlled scope and not to the detriment of other community priorities</p>	<p>This comment is noted. Proposed policy EMP1 - 3 seek to provide this flexibility in line with objective PE2. Where proposals for additional employment floorspace proposed policies stipulate that no harm or adverse impact must be created. National planning policy states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities. policy EMP3 for example says that that proposals for employment land outside designated areas will be permitted providing that it would not lead to any harm for example to neighbouring properties.</p>	<p>No change.</p>

<p><b>PE2</b> - This includes provision parking for employees and customers</p>	<p>This comment is noted. Parking must be provided in line with parking standards set out in the DMP</p>	<p>No changes.</p>
<p><b>PE2- Use of empty space</b> - Many empty premises in Redhill that could be possibly offered as incubator premises, which would also enhance the town centre.</p>	<p>This comment has been noted. Policy EMP4 reflects national planning policy requirements that land and premises should only be protected where there is a reasonable prospect of employment use and therefore allows changes of use away from employment uses if evidence can be provided that the units are no longer viable. Proposed policy EMP3 recognises that many small and new businesses do not wish to locate on the existing employment areas and therefore proposes to allow home working and the development of employment units outside of designated areas providing no additional harm is caused. At least 7,500sqm of employment floorspace focussed in small business / incubator space) is proposed for Albert Road North (REI2).</p>	<p>No changes.</p>
<p><b>PE2</b> If it is in the interest of the community not if it means giving it to people who have no interest but to make money</p>	<p>This comment is noted. This proposed objective seeks to provide flexibility for local businesses through allowing extensions to existing premises, homeworking and premises to be built outside of designated employment areas providing no harm is caused. Whilst planning policy can control the particular use of a building, it cannot control who occupiers are.</p>	<p>No changes.</p>
<p><b>PE3</b> - Clarity is required for defining what is meant by 'local people' as distinct from people de facto working locally but who come from areas significantly outside Reigate &amp; Banstead</p>	<p>This comment has been noted. This proposed objective seeks to deliver apprenticeships and training opportunities for local borough residents which is stipulated in Policy EMP5</p>	<p>No changes.</p>

<p><b>PE3</b> - depending on the kinds of 'jobs and skills benefits' proposed. Green technology, schools, medical facilities, public transport yes (with some reservations) but no thanks if destructive industries such as arms, biotechnology, finance, large corporate operations.</p>	<p>This comment has been noted. In terms of the 'jobs and skills benefits' proposed, proposed policy EMP8 seeks developers of new residential development of 25 or more units and non-residential development in excess of 1,000sqm to provide apprenticeships. It also seeks for non-residential schemes that local training and placement schemes targeted at local residents in respect of any jobs created will be provided or supported. The DMP cannot control what uses these jobs come from other than within the parameters of what national policy stipulates.</p>	<p>No changes.</p>
<p><b>PE3</b> - DMP should actively look towards opening such opportunities for high value added industries and technology based services to attain a more comprehensive approach to regeneration and sustainable economic growth. This means that there needs to be the premises and opportunities made available to allow such business to expand and the potential to relocate to Reigate &amp; Banstead. In parallel the DMP will also need to attract skilled workers to support these businesses and further raise the employment profile of the Borough and a means to this is through the availability of good quality housing.</p>	<p>This comment has been noted. The Local Economic Needs Update Development Management Plan Evidence Paper identified key growth sectors including advanced manufacturing / R&amp;D in electronic. Computer product manufacturing; construction supplies trade counter wholesaling; food distribution; distribution and warehousing facilities; and financial, insurance and professional service industries.</p> <p>EMP1 - EMP4 seek to support these types of businesses. The Council's economic prosperity team also work to support the economic prosperity of the borough.</p>	<p>No changes.</p>

<p><b>PE3</b> - I want to Council to encourage business to expand within Horley, without extra investment there is no chance of future retail development.</p>	<p>This comment has been noted. The Retail Needs Assessment identified the need to improve the retail offer within Horley. The Council has some ability to control the use class of shop units in Horley, however, it is not able to control the individual businesses that operate from a shop unit and are therefore not able to stipulate that units are occupied by larger businesses. However, the Council intends to improve the offer and image of the town centre, which is intended to attract larger businesses. The Council intends to improve the offer through its dedicated regeneration strategy.</p> <p>The Council intends to improve the offer within Horley through not reducing the retail frontage threshold as it has for other town centres, thereby requiring planning permission for changes of use. Where a planning permission for a change of use has been proposed, evidence would be needed that the unit is no longer viable for A1 and the proposed use would add to the vitality and vibrancy of the town centre. The Development Management Plan also proposes a number of town centre opportunity sites, it is intended that these will improve the offer within the town centre.</p>	<p>No changes.</p>
<p><b>PE3</b> - It is normal for people to travel to commercial/ industrial areas for work. The priority for Reigate should be housing and recreation/ services. This is a commuter town, employment within Reigate is not the priority.</p>	<p>This comment is noted. National planning policy states that planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p>	<p>No changes.</p>

<p><b>PE3</b> - it would not be appropriate to develop policies which require new employment development to demonstrate direct benefits to local people. Due to the Boroughs location close to the M25 and with access to the Chanel Tunnel and ports it is a location attractive to national and international companies who benefit the economy as a whole rather than specifically the local area. Skilled employees are attracted from a wider area and planning should not act to restrict this.</p>	<p>This comment has been noted. This proposed objective seeks to require training and apprenticeship schemes for local borough residents for residential developments of more than 25 units and non-residential development in excess of 1,000sqm, rather than requiring new employment development to demonstrate direct benefits to local people.</p>	<p>No changes.</p>
<p><b>PE3</b> - 'new development' is worrying. Would support local people but wonders what percentage of people working in the borough are in fact local.</p>	<p>This comment has been noted. This proposed objective relates to proposed policy EMP8 which seeks to require developers of more than 25 residential units and 1,000sqm or more of commercial floorspace to agree to and implement a training and employment plan including the provision of apprenticeships and/ or training for local borough residents. Approximately a third of the borough's working population work in the borough.</p>	<p>No changes.</p>
<p><b>PE3</b> - What is this? Rate reduction or other financial support</p>	<p>This comment has been noted. This proposed objective relates to the provision of apprenticeships and training opportunities for local people.</p>	<p>No changes.</p>
<p><b>Pitwood</b> - Rogers building in Pitwood Industrial Park should be locally listed, as it is a good example of the work of an internationally-renowned architect.</p>	<p>This comment has been noted. This is not within the remit of the DMP.</p>	<p>No changes.</p>

<p><b>Rates</b> - Sufficient space already but high business rents put off entrepreneurs. Low unemployment rates in the area and skills/training can be provided by employers already located in the area.</p>	<p>This comment has been noted. Business rates are set by the Valuation Office Agency, not Reigate &amp; Banstead Borough Council.</p> <p>In terms of providing skills/ training, proposed policy EMP8 seeks developers of new residential development of 25 or more units and non-residential development in excess of 1,000sqm to provide apprenticeships. It also seeks for non-residential schemes that local training and placement schemes targeted at local residents in respect of any jobs created will be provided or supported.</p>	<p>No changes.</p>
<p><b>Rates</b> - This will probably have to link into business rate reliefs to stand any chance of succeeding. i.e. I doubt the planning system alone can do anything to protect viability of businesses.</p>	<p>This comment has been noted. Business rates are set by the Valuation Office Agency, not Reigate &amp; Banstead Borough Council.</p>	<p>No changes.</p>
<p><b>Reigate</b> - Creating more jobs in Reigate will devalue house prices.</p>	<p>This comment has been noted. In order to create a sustainable community, there is a need to plan for future employment, retail and residential needs in line with our evidence base (see the DMP evidence base on the Council's website)</p>	<p>No changes.</p>
<p><b>Reigate</b> - The loss of business space in Reigate has not been replaced in the north east of borough.</p>	<p>This comment has been noted. It is not clear what business space in Reigate is being referred to or why it would be replaced in the north east of the borough. The DMP proposes site allocation to support provision of different uses of land, including employment use, in line with the evidence base.</p>	<p>No changes.</p>



<p><b>Salfords industrial estate</b> - Day Group support the proposed expansion of northern part of this industrial estate area and are currently considering development options for this land. It is highlighted for completeness that initial consideration indicates it could potentially accommodate in the region of 7,000 sqm of new employment floorspace.</p>	<p>This comment has been noted.</p>	<p>No changes.</p>
<p><b>Small business area</b> - We are concerned about the removal of the Small Business Policy. We feel there is already insufficient protection of and practical support for independent shops and this is a major issue for Tadworth and Banstead. They are also suffering from the lack of local parking compared with the superstores and are under pressure from them and the chains including Subway, Dominoes etc. which have come to Banstead and elsewhere.</p>	<p>This comment is noted. It is proposed that the Area for Small Business policy is no longer considered necessary in the light of national policy changes which have introduced a more flexible permitted development regime, which allow A1, A2 and A3 uses to interchange (subject to various criteria). See here for further information <a href="https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use/2">https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use/2</a></p> <p>The NPPF considers business use as appropriate town centre uses - the Development Management Plan proposes town centre boundaries for the town centres, i.e. areas where business use would be appropriate. In relation to Tadworth and Banstead, neither area currently has a designated Area for Small Business.</p> <p>Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough.</p>	<p>No changes.</p>
<p>Surprised dmp didn't include possible relocation of Surrey cc to Kingswood as proposed by Crispin blunt. I would definitely support this.</p>	<p>This comment has been noted. This is not something the DMP would cover.</p>	<p>No changes.</p>

<p><b>Traffic</b> - I am concerned with traffic management in Redhill, both now and in the future. Continually adding large businesses such as supermarkets will NOT improve traffic flow and draw more cars into the town. The Lakers hotel area is one major development concern. Adequate car parks, rather than residential areas, are essential.</p>	<p>This comment has been noted. Reigate &amp; Banstead Borough Council have worked with Surrey County Council's Transport department in order to model the potential impact all the proposed development would have. This is detailed in the Transport assessment on the Council's website.</p> <p>Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. TAP1 requires that parking is provided in line with parking standards and the policy also states that development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p> <p>Car park survey work was undertaken in order to understand the potential impact of development on Redhill's car parks. A new multi storey car park is being delivered as part of the Sainsbury's development and another is proposed as part of the Station redevelopment.</p>	<p>No changes.</p>
<p>We need more local businesses to encourage local people not to commute so we can regain a sense of community. For this to happen, we also need decent wages and affordable housing. With a 3 bed house in Reigate now nearly half a million, you need to have two people earning 50k each to afford this. Show me local business paying this money,</p>	<p>The affordability of housing within the borough is recognised as a key concern of local residents. Proposed policy DES7 requires developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership. The requirements for affordable housing are set out in the affordable housing SPD. This policy, and policy DES5, seeks for a range of housing sizes and tenures to be provided in order to enable more balanced communities, to ensure choice but also to enable people to remain within the communities in which they are a part of. Planning policy is not able to control what businesses pay.</p>	<p>No changes.</p>

<p>We note that two of the four principal employment areas are in our Parish, which we acknowledge and accept; we say there should be no extension of these areas, and no significant new employment developments elsewhere in the Parish. We support Policy EMP1. The Principal employment area in Salfords should be adjusted to provide a major extension of the station car park</p>	<p>This comment has been noted. It is unclear what this adjustment would look like from the comment but expansion of the station car park would be something for the provider to bring forward should there be a need for it.</p>	<p>No changes.</p>
<p>With forthcoming changes to business rates retention, I consider it important that commercial developments are not held up unnecessarily by vexatious appeals. Subject to normal planning considerations -yes, but the local plan must be able to facilitate these, rather than be used as a tool to stall them.</p>	<p>This comment is noted. The policies seek to give clarity to applicants and Development Management in what is expected from each party. These policies, however, will not apply until the Development Management Plan is adopted (programmed for late 2018).</p>	<p>No changes.</p>
<p><b>PE1</b> currently permitted development rights allow office to residential conversions across the borough. However, this is not considered in the housing numbers (windfall allowance). This change was introduced in September 2013, after the Core Strategy had been written. This additional housing, which is estimated in the plan as 250 homes over the plan period, through an enhanced windfall figure of 25/year, should be factored into the DMP, and will reduce the number of units to be delivered on other sites.</p>	<p>This comment has been noted. It is intended that the higher 75 dwelling per annum windfall allowance - including permitted developments - is to be carried forward rather than the previous 50.</p>	<p>No changes.</p>
<p>Article 4 directions should be used to ensure employment land is not converted to housing.</p>	<p>This comment has been noted. the Council is keeping the need to implement article 4 directions under review it currently is not actively pursuing creating any. However, an article 4 does not prevent change of use just requires planning permission and national policy includes a presumption in favour of granting such permissions.</p>	<p>No changes.</p>

<p>We agree that this is a need that has changed dramatically with new technology. It seems the Legal &amp; General site in Kingswood has been sold to a residential developer (see TWRA’s memorandum). The Council has certain powers to retain it as offices.</p> <p>There is also the potential loss of other office and industrial sites borough wide as set out in the DMP. We are not convinced that it is sensible to concentrate employment on a new 172-acre Business Park in open green space outside Horley. There is a large Business Park nearby in the next local authority which is apparently not fully occupied.</p> <p>We think employment needs to be looked at across the Borough and retained where possible in different centres. The development value of residential use outweighs that of office use so it is particularly important in planning policy to maintain a sensible balance. Central Government now provides incentives to Local Councils to put in residential units and there are infrastructure payments due from developers on larger developments. The problem is many are “executive homes” and the question is whether they are affordable for local people? Is this just encouraging more people to relocate to experience the commuting, travel, parking, school, hospital and infrastructure problems that residents and workers contend with already?</p>	<p>This comment has been noted. In preparation for the Regulation 18 Development Management Plan, the Council reviewed all existing Borough Local Plan (2005) designated employment areas and re-examined the local economic needs assessment.</p> <p>The Council proposes to designate principal and local employment areas throughout the borough and proposed policies EMP1 and EMP2 seek to guide appropriate development within these areas.</p> <p>A number of town centre opportunity sites are also proposed either in full or part for office use: BAN1 (The Horseshoe) small scale retail, leisure and other commercial uses; REI1 (Library and Pool House) up to 1,000sqm retail/ commercial/ leisure/ community uses; REI3 (Albert Road North) at least 7,500sqm of employment floorspace; and RTC6 (Gloucester Road Car Park) approximately 4,000sqm offices.</p> <p>Proposed policy EMP4 seeks to safeguard employment land and premises within the Borough but recognises that paragraph 22 of the National Planning Policy Framework says that such premises should only be safeguarded where there is a reasonable prospect of employment use. Proposals for changes of use would require evidence that the premise has been vacant for at least six months, marketing evidence can demonstrate that the unit is no longer viable and that the proposed use would not affect the efficient operation or economic function of other employment uses or businesses in the locality.</p> <p>The Borough has a significant need for housing - we have</p>	<p>No changes.</p>
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	<p>an adopted Core Strategy with a housing target of 460 dwellings per annum - but as noted above, evidence would need to be provided that the units are no longer viable for employment use. Proposed policy DES4 seeks to ensure that new developments provide a mix of housing types and tenures. The proposed policy seeks to ensure for example that smaller family houses are provided on infill developments. Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to understand the infrastructure requirements of the proposed developments in the Regulation 18 Development Management Plan. The subsequent health, employment and transport infrastructure needs are outlined in evidence papers on the Council's website.</p>	
<p><b>Small employment areas</b> - Concerned at the loss of small employment areas without replacement proposals and the viability of replacing some community facilities/ library.</p>	<p>This comment has been noted. Policy EMP3 recognises that many new and small businesses do not operate from existing employment areas. It seeks to grant planning permission for employment uses outside designated areas where no harm would be caused and allow working from homes where there would be no loss of residential unit, the use remains ancillary to the residential use and does not cause impact/ harm. In terms of community facilities/ library - no facilities are intended to be lost. Where redevelopment is proposed, alternative provision is intended.</p>	<p>No changes.</p>
<p>Policy CS8 (as summarised by Box 7) - needs to be more protection for employment sites. Particularly for small sites perhaps not in good condition in residential areas.</p>	<p>This comment has been noted. Policy CS8 is a Core Strategy Policy. The Core Strategy was adopted in July 2014. The policies in the Development Management Plan are intended to provide more detail to the Core Strategy Policies.</p>	<p>No changes.</p>

The Council has powers under an Article 4 Direction to remove permitted development rights for office to residential conversion. Epsom & Ewell Borough Council has used these powers. The Council has disclosed, in response to a request under The Freedom of Information Act, that it has NEVER sought to use these powers anywhere in the Borough to protect office use. We are aware that under Government rules compensation can be owed by the Council in some cases to the developer but there are accepted ways of mitigating that.

Our concern is that the large Head Office site soon to be vacated by Legal & General (not mentioned in the DMP) has apparently been bought by a residential developer. In addition, various other sites of offices or commercial units in Redhill (The Royal Mail Sorting Office and Copyhold Works) and Reigate (Albert Road) are going to be redeveloped under the DMP as residential or possibly for residential use. The Council's thinking appears to be to concentrate offices in the proposed huge new Horley Business Park on open space. This goes totally contrary to the existing Local Plan and established planning policy in the area to date. We have deep reservations about this proposal as we think offices and employment are vital but need to be spread and encouraged in various parts of the Borough including underused areas like the Waterfield Trading Estate in Tadworth.

This comment has been noted. Removal of permitted development rights does not prevent premises from being converted from offices to residential. Should planning permission be applied for such conversion and evidence be provided that the unit has been marketed for at least six months, marketing evidence demonstrates that the premise is no longer viable, and the proposal would not adversely affect the efficient operation or economic function of other employment uses/ businesses in the locality, then planning permission will be granted for such changes of use. Should the Legal and General site be proposed for residential development, marketing evidence would be required that the premise would no longer be viable for employment use.

The Development Management Plan proposes the potential delivery of approximately 4,000sqm on Gloucester Road. For Albert Road, the Council proposes at least 7,500sqm of employment space focused on small business/ incubator space and comprising a mix of offices and small workshops. Waterfield/ Pitwood Park, Tadworth employment area was reviewed as part of the Employment Areas Review and designated as a local employment area.

Proposed policy EMP2 recognises the importance of these areas for local opportunities for business location and development and seeks to guide appropriate development.

To inform the Development Management Plan an Employment Area Review was prepared, the Local Needs Assessment updated and work was undertaken to assess the potential for a Strategic Employment Site. Further

No changes.

<p>We believe the policy and evidence base provided by the Council in relation to employment needs and occupancy is flawed and this needs to be addressed before Examination so that the Inspector has the proper information on which to make a determination.</p>	<p>work has been undertaken to review the assumptions made and guide the policy approach regarding the proposed Strategic Employment Site.</p>	
<p><b>EMP1</b> - Although we appreciate the need for more housing, we are concerned at the number of sites currently providing low cost accommodation for small firms which are proposed for residential development. How will existing and new businesses be accommodated in the borough, bearing in mind that these will be providing the jobs for tomorrow? The proposed business park south of Horley is remote from most of the Borough's population and likely to be expensive for small and start-up businesses.</p> <p>We note that the Local Economic Needs assessment Update (2016) proposes a minimum of 6,500sqm of additional industrial space and 11,000 sqm of additional storage and distribution space. It would appear that some of this will be located in the new site to the south of Horley but we assume much of this new business park will be developed for office use. It is not clear how much existing occupied commercial floorspace will have to be</p>	<p>This comment has been noted. The reasons section on page 20 says that applicants will be required to provide appropriate evidence, proportionate to the scale of the scheme, to demonstrate prospects of on-going employment use including, as a minimum, evidence of unsuccessful marketing.</p> <p>REI3: Albert Road North Industrial Estate is proposed for a mixed-use employment area of at least 7,500sqm of employment floorspace focussed on small businesses/ incubator space and comprising a mix of offices and small workshops and up to 50 residential units. It is felt that there are a number of constraints on site, including access, and the 'mismatch's this can create with some types of occupier. Further details can be found in the Development Management Plan Employment Area Review.</p> <p>Proposed policy EMP4 seeks to safeguard employment uses. The proposed policy recognises the need to safeguard employment premises but also paragraph 22 of the National Planning Policy Framework which says that changes of use</p>	<p>No changes.</p>

vacated in order to redevelop for housing and what will be the net loss of employment land. We query the need for additional floorspace on the Horley site bearing in mind the vacant floorspace which will be available on the legal and General site in Kingswood and the amount of existing employment land proposed for housing . We suggest that more existing locations are proposed as 'principal' or 'local employment' areas. We also suggest that article 4 directions are applied in order to ensure the land does not revert to housing.

will be granted if the unit has been vacant for at least 6 months, if marketing evidence demonstrates that the unit is no longer viable and if the proposed use will not adversely affect the efficient operation or economic function of other employment uses or businesses in the locality.

Proposed policy EMP3 recognises that not all employment uses will want to locate within the existing employment areas and seeks to guide such development. It also outlines criteria for homeworking.

The proposed business park is proposed to be located to the south of the Borough as the Advice on the scope for a Strategic Employment Site within Reigate & Banstead identified that land within the south of the Borough, and particularly Horley, was the optimal search area. The important factors were felt to be proximity to Gatwick Airport; high profile location; excellent connectivity including strategic road, rail and public transport access; and aligning with wider economic objectives, including LEP priorities which seek to focus strategic growth on the 'heart of the Gatwick Diamond area'. Further work was undertaken (Strategic Employment Provision Opportunity Study) to identify the proposed site.

Neither the Legal and General site nor Fidelity would fulfil these criteria; both are also of a 'head quarter' style, have poor access, are remote and are in the Green Belt and therefore offer limited possibilities to accommodate a strategic employment need.

The Local Economic Needs Assessment concluded that at least 18,000sqm of the industrial/ distribution floorspace



need could be met through better use of existing designated employment sites. A number of town centre opportunity sites were identified for potential office use including the Royal Mail depot, Redhill, and Reading Arch Road, Redhill, which were considered to have the potential for approximately 8,000sqm of additional office space.

In preparation of the Regulation 18 Development Management Plan, an Employment Area Review assessed all of the employment areas designated in the 2005 Borough Local Plan, of those intending to be carried forward, the report identified local and principal employment areas. The Council is not proposing any additional new principal or local employment areas.

Article 4 directions do not prevent employment uses being converted to residential. Rather, they require planning permission. Should evidence be provided that the unit has been marketed for at least 6 months, marketing evidence demonstrate that the property is no longer viable and that the premise would not adversely affect the efficient operation or economic function of other employment uses or businesses in the locality, then planning permission would be granted.

ELECTRONIC COMMUNICATION NETWORKS		
<p><b>EMP7</b> - The principle is fully supported but in some localities the geographies and scale would permit distribution by radio, avoiding excavation. There are exemplars of high speed wireless linkage from a local hub in communities here and abroad.</p>	<p>The most common method of providing broadband is via cables and as such the policy seeks to require inclusion of this into new developments. However, the policy also states that other forms of infrastructure should be provided as appropriate where possible and viable which seeks to support other methods.</p>	<p>No changes</p> <p>Policy has been changed from EMP7 to DES9</p>
<p><b>EMP7</b> - 1) assumes that facilities exist in the highway. As service is poor in parts of the Borough, we suggest there be a policy to improve reception Borough wide. 2) We suggest that there should be an additional point, 2c) referring to potential health impacts. The reason is that it is recognised that proximity to some equipment can cause health problems.</p>	<p>The policy has been updated to refer to nearest exchange or cabinet rather than highway. The actual improvement of the service is not something that planning policy can demand of the service provider for existing development.</p> <p>Health concerns have also been noted. Whilst the Government recognises that they have a duty to protect the health of residents, they also hold a firm view that it is not the place of the planning system to determine health safeguards; national guidance states that Local Planning Authorities should not seek to determine health safeguards if the proposal meets International Commission guidelines for public exposure.</p>	<p>Policy has been amended to refer to nearest exchange or cabinet rather than highway</p> <p>Policy has been changed from EMP7 to DES9</p>
<p><b>EMP7</b> - para 1 how are you going to enforce that. Also unnecessary as every development would do so anyway.</p>	<p>The requirement is set out to ensure that new development is set up for future communications needs. Enforcement would be the same as for all planning conditions.</p>	<p>No changes</p> <p>Policy has been changed from EMP7 to DES9</p>

RETAIL		
<p><b>Banstead</b> - A bigger retail area is not needed in Banstead due to close proximity of a large supermarket in Burgh Heath and many shops in Sutton.</p>	<p>This comment has been noted. As outlined in the DMP Town Centre Evidence Paper, Reigate &amp; Banstead Borough Council are not proposing any changes to the designated primary retail area.</p> <p>The Retail Needs Assessment taking into account nearby retail areas including Sutton and ASDA at Burgh Heath, identified a need for an additional 1100sqm of comparison retail by 2027.</p> <p>We are therefore proposing small scale retail/ community/ other complementary commercial small scale development on the Horseshoe - it is felt that this is in close proximity of the main high street and would be a natural extension.</p>	<p>No changes.</p>

<p><b>Banstead</b> - The Retail Needs Assessment of 2016 considerably reduces the additional retail floor space likely to be required in the plan period, but there have not been further and more logical reductions to those targets as set out with in the core strategy. It is inappropriate to propose more comparison floor space for Banstead Village and as most shopper /residents more usually to go to Epsom, Sutton, Kingston or Croydon for comparison shopping, or increasingly shop online, which in itself cause more vacant shops and potentially loss of vitality if too much new floor space is proposed.</p>	<p>The floorspace needs identified in the Retail Needs Assessment are intended to be brought forward rather than those detailed in the Core Strategy. These are felt to be better represent current economic and market circumstances and shopping trends (such as online shopping). The Retail Needs Assessment identified a need to provide 900 sqm of comparison floorspace within Banstead over the course of the plan period. It is felt that this could be met through improved performance and minor extensions. The Council is not intending for Banstead to compete with towns such as Kingston, it is recognised that the centres have a different offer and different function.</p>	<p>No changes.</p>
<p><b>Banstead</b> - It is acknowledged that the core strategy target of at least has been reduced to an up to (and substantially smaller) level. The reasoning for this is dubious as it is aimed at comparison shopping is most affected by the accelerating trends of on-line shopping and home deliveries. The compression of retail space into smaller areas, thus increasing density / amenity impact and the like, and the impact that has on overall boundaries / car parking does not appear to have been considered.</p>	<p>.</p>	<p>No changes.</p>

<p><b>Banstead</b> - Banstead is the only shopping centre in Area 1. It serves the needs of scattered communities who regard it as their town centre. The basis of the proposals is, we believe, specious; informal canvasses of a significant number of local residents produce an almost universal response that Banstead does not need more shopping premises. These opinions are generally based on a perception that those shops that already exist have difficulty in surviving, they need more custom.</p> <p>There is an unfortunate proliferation of charity shops, opticians and cafés but this not the type of retail that serves every day needs. If Banstead really is to be an attractive and useful retail centre it needs a magnet. An example of this would be a Lidl/Aldi store or a full Marks and Spencer department store. Planners need to consider what these magnets are to be in order to make Banstead a vibrant centre and to create a town plan that accommodates them. Please remember to give weight to opinions from the Banstead Village hinterland.</p> <p>Whilst the Retail Needs Assessment concluded that there is no significant quantitative need for extra convenience floor space in the borough the increase that the Core Strategy seeks in Area 1 of 1200</p>	<p>This comment has been noted. The Retail Needs Assessment concluded that there was no need for additional convenience retail but identified a need for 1100sqm of comparison retail floorspace need by 2027. It is intended that these floorspace projections/ needs are carried forward rather than the Core Strategy targets. It is felt that the Retail Needs Assessment, prepared by independent consultants and which is based on indepth research, provides an appropriate evidence base to inform policies.</p> <p>In order to meet this identified need we are proposing small scale retail (and other uses) on the Horseshoe (BAN2) and 136-168 High Street (BAN1). In order to improve the offer within the town centre, it is proposed to reduce the A1 frontage rate from 75 to 65% (A1 retail currently only occupies 73% of the frontage and there has been a considerable increase in the number of vacant A1 units within the last couple of years).</p> <p>Comments regarding a 'magnet' store have been noted, however, this would have to be led by the market. The Retail Needs Assessment concluded that Banstead had a good representation of retailers - including national operators.</p>	<p>No changes.</p>
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<p>sqm would be significant. Is it really necessary? Do not confuse this with social vibrance.</p>		
<p><b>Banstead</b> - Banstead should not be treated as if it were a town, and should have its own separate set of policies to reflect its status as a village.</p>	<p>The wording in the DMP is consistent with the wording in the adopted Core Strategy (See Policy CS7(2)). When devising the retail policies, consideration has been given to each of the individual centres, for example given the good representation of food and drink uses within Banstead, it is not proposed to allow changes of use to A3, where this would lead to the A1 threshold falling below the prescribed level, like we are proposing for Horley and Redhill.</p>	<p>No changes.</p>
<p><b>Banstead</b> - Community facilities in Banstead should only be redeveloped if they need to expand to deliver more or better services.</p>	<p>This comment has been noted. As stipulated within the Development Management Plan community uses would need to be retained/ improved on the three existing community sites proposed for redevelopment in Banstead.</p>	<p>No changes.</p>
<p><b>Banstead</b> - If there were any future demand in Banstead for retail, this could be met by extending existing units to the rear and even consolidating two units into larger units.</p>	<p>Noted. The Retail Needs Assessment identified that there was a need for approximately 1100sqm of comparison floorspace by 2027, rising to approximately 1,800sqm by 2032. It was felt that this could be met through a combination of improved performance of existing stores, small scale extensions and small additional provision. The Regulation 18 Development Management Plan therefore only proposes two small opportunities for retail/ leisure provision (BAN1 and BAN2).</p>	<p>No changes.</p>

<p><b>Banstead</b> - In Banstead there should be a policy of 70% A1 retail frontage - reducing it to 65% will make the village a less attractive place to visit.</p>	<p>This comment has been noted. Given the significant increase in the number of vacant A1 units in the last couple of years, it is felt that 65% is more appropriate. This will allow some changes of use whilst still retaining the retail core. It is felt that occupied units, and a greater variety of choice in offer, would make the town centre more attractive.</p>	<p>No changes.</p>
<p><b>Banstead</b> - More attention should be given to monitoring the commercial mix in Banstead High Street.</p>	<p>Noted. Reigate &amp; Banstead Borough Council monitor the commercial mix (i.e. the mix of shops, restaurants, offices etc) within all town centres and local centres on a quarterly basis. It is felt that this is sufficient to reflect changes in use and the proposed retail policies seek to retain an appropriate balance of complementary uses in shopping areas. With regard to occupiers of premises such as shops, whilst Reigate &amp; Banstead are able to control the uses of properties (i.e. shop, restaurant etc), we are unable to control which occupiers occupy the premises through the planning process (unless we own these premises).</p>	<p>No changes.</p>
<p><b>Banstead</b> - More comparison floorspace is not needed in Banstead, people go to nearby towns for that, and too much floorspace will lead to vacancies.</p>	<p>Noted. The Retail Needs Assessment identified the need for approximately 1100sqm of comparison floorspace by 2027, increasing to about 1,800sqm by 2032. It was felt that this could be met through improved performance of existing stores and small scale extensions or provision. It was felt that this retail floorspace would be needed to ensure that Banstead could remain competitive to other town centres.</p>	<p>No changes.</p>

	Reigate & Banstead Borough Council monitor town centre uses including vacant floorspace regularly.	
<p><b>Banstead</b> - New shops are ruining the look of Banstead village. The character of Banstead is predominantly small shops, and it should be encouraged to stay this way. Large national chains are having a negative impact on local businesses in Banstead. Independent businesses should be given particular encouragement to locate in Banstead - possibly by subsidising business rates for them. Concern that there is not enough range and variety of shops.</p>	<p>This comment has been noted. Proposed policy RET1 seeks to ensure that within town centre development proposals are of an appropriate character and proposed policy DES10 covers control of advertisements and shop front design.</p> <p>Policy RET2 seeks to ensure an appropriate mix of uses within Banstead Village Centre.</p> <p>Business rates is not something that can be controlled by the DMP.</p> <p>With regard to occupiers of premises such as shops, whilst Reigate &amp; Banstead are able to control the uses of properties (i.e. shop, restaurant etc), we are unable to control which occupiers occupy the premises through the planning process (whether local or national brands)</p> <p>No large stores have been proposed in the Development Management Document (DMP). The DMP proposes small scale retail in line with the Retail Needs Assessment which identified a comparison floorspace need of about 1100sqm by 2027, increasing to about 1,800sqm by 2032. It was felt that this could be met through improved performance of existing stores and small scale extensions or provision.</p>	No changes.
<p><b>Banstead</b> - Several existing retail units in Banstead are already empty and there are difficulties filling them with viable traders. No additional retail units are needed in</p>	<p>This comment has been noted. The Retail Needs Assessment identified a comparison floorspace need of about 1100sqm by 2027, increasing to about 1,800sqm by 2032. It was felt that this could be met through improved performance</p>	No changes.



Banstead.	<p>of existing stores and small scale extensions or provision.</p> <p>The Regulation 18 Development Management Plan proposes two sites (BAN1 136-168 High Street and BAN2 The Horseshoe) as potential for small scale retail uses.</p>	
<p><b>Banstead</b> - The shops opening are only big chains which do not help define an area. Small businesses cannot afford the current rents and rates. If housing is what is being looked at here look above the shops and use brown sites not destroy what we already have.</p>	<p>This comment is noted. Whilst Reigate &amp; Banstead Borough Council have some ability to control the 'use class' of the shop units in the town centres (and the appearance of shop fronts), it is not able to control the individual businesses that operate from a shop unit (unless the unit is owned by the Council). Big chains can help define an area as they can act as a destination and attract footfall which leads to other smaller shops being attracted to the area.</p> <p>Rents are market driven and the council are unable to control the prices asked. Should a proposal be for a change of use away from retail, marketing evidence would be required including evidence that the unit has been marketed at an appropriate rent/ sale price, reflecting local conditions.</p> <p>Similarly, the Council are unable to control business rents, these are set by central government, however there are rate reliefs for smaller businesses.</p> <p>Within Banstead, mixed use retail/ community/ residential developments are proposed within the town centre which is in accordance with national policy</p>	No changes.
<p><b>Building</b> - Building a retail park in Banstead is unacceptable, people can go to Croydon, Sutton, and Kingston already.</p>	<p>This comment has been noted. The Development Management Plan does not however propose a retail park within Banstead, only small scale retail in line with the Retail Needs Assessment which identified a comparison floorspace need of about 1100sqm by 2027, increasing to about</p>	No changes.

	1,800sqm by 2032. It was felt that this could be met through improved performance of existing stores and small scale extensions or provision.	
<b>Business areas</b> - Why are there no business areas designated in town centres? Digital start-ups are ideal for transport hubs and help to diversify the retail demographic.	This comment has been noted. The National Planning Policy Framework says that business uses are appropriate town centre uses, so these uses are supported within town centres anyway. The town centre boundaries have been drawn to include office/ business functions and these uses will be supported within the town centre.	No change.
<b>General</b> - A high street with diversity of shops is important to the community not all charity shops or coffee shops. Experienced retailers are essential to the high street.	This comment has been noted. Proposed policy RET2 seeks to ensure a vibrant mix of uses within the town centres. However, whilst Reigate & Banstead are able to control the uses of properties (i.e. shop, restaurant etc), we are unable to control which occupiers occupy the premises through the planning process.	No changes.

<p><b>General</b> - Good town centres depend on levels of business rates and supporting infrastructure such as car parks, road and footway maintenance, refuse collection, public toilets, library, policing, etc. NOT on more building.</p>	<p>This comment has been noted, business rates. Refuse collection, public toilets and policing are not within the remit of the DMP. In terms of parking, Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets. Proposed development has been informed by our evidence base which includes assessment of employment, retail and housing needs as well as infrastructure required to support this</p>	<p>No changes.</p>
<p><b>General</b> - It would be good if buildings in the town centre of Redhill were designed to last more than around 30 years</p>	<p>This comment has been noted. Design policy DES1 seeks to ensure the longevity of buildings through ensuring that buildings are of a high quality, create a safe environment and are inclusive and accessible for all.</p>	<p>No changes.</p>
<p><b>General</b> - Need to safeguard the existence of the high street against Amazon et al</p>	<p>This comment has been noted. The proposed retail policies seek to ensure the viability, vitality and vibrancy of both the town and local centres.</p>	<p>No changes.</p>
<p><b>General</b> - Our town centre needs development not other areas</p>	<p>This comment is noted. The retail policies seek to ensure retail uses are located within existing town and local centres, rather than the creation of out of town centres.</p>	<p>No changes.</p>

<p><b>General</b> - Popular retail spaces require parking - the better the shops are the greater the distance people will travel BY CAR! They don't want to carry heavy bags on buses or walk so please don't think that reducing car parking is a sensible option. Car parking fees in town centres have discouraged people from visiting the town centre.</p>	<p>Noted. The DMP does not deal with existing parking provision but for new development Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets</p> <p>Car parking fees are not an issue that can be dealt with through the DMP.</p>	<p>No changes.</p>
<p><b>General</b> - The plan should aim for modest growth in smaller settlements near Banstead, allowing them to replicate the services offered in Banstead closer to where people live, thus reducing the need for car journeys.</p>	<p>This comment has been noted. There are a number of local centres/ proposed local centres around Banstead including Tadworth, Walton on the Hill, Woodmansterne, Chipstead, Kingswood and Lower Kingswood. Proposed policies RET3 and RET6 seek to ensure the protection of these areas and to ensure that they remain vibrant, attractive and viable.</p>	<p>No changes.</p>
<p><b>General</b> - To ensure that there is continued development of main and local shopping areas to provide adequate and safe environments so that such areas do not loose out to out of town shopping areas.</p>	<p>Comment has been noted. Local centres are recognised as providing an important function, providing shops, services and facilities that are easily accessible. Proposed policy RET3 seeks to ensure that these uses are retained within the local centres, but recognises that in some cases units may be unviable. Should marketing evidence be provided that the unit is unviable then changes of use will be granted.</p>	<p>No changes.</p>

<p><b>General</b> - Town centre sites should not be over developed.</p>	<p>This comment has been noted. The policies and site allocations have been carefully considered to ensure a balance is achieved between providing development in line with identified need whilst still ensuring a high quality of life for residents and those who use the borough.</p>	<p>No changes.</p>
<p><b>General</b> - Vibrant town/local centres must be the aim. Some change of use flexibility may be needed if, as peoples needs change and develop, a high property occupancy is to be achieved.</p>	<p>This comment has been noted. Proposed policies RET1, RET2 and RET3 seek to ensure town and local centres are vibrant and that there is flexibility to adapt to future changes.</p>	<p>No changes.</p>
<p><b>General</b>- shops should be in town centre, not green fields on the fringes.</p>	<p>This comment has been noted. Small scale retail is proposed for SSW2 as part of the urban extension. This retail provision would be of a neighbourhood scale and would not be of a scale to compete with the town centre. Otherwise, policies direct retail provision to town or local centres, although do seek to protect existing stand alone shops as well where viable.</p>	<p>No changes.</p>

<p><b>Horley</b> - A blue print for Horley town centre should be put in place in a structured way, rather than just allowing owners to put forward random sites which leads to a collection of ill-matched, inappropriate buildings.</p>	<p>This comment has been noted. Proposed policy DES1 seeks to ensure that new development is of a high quality and takes into account the local character.</p> <p>Horley has a dedicated regeneration programme which aims to make improvements to the town centre as well as integrate the two new neighbourhoods into the town.</p> <p>In terms of a structured approach, the Development Management Plan outlines a number of key sites for redevelopment. A number of these are owned by either Reigate &amp; Banstead Borough Council or Surrey County Council.</p>	<p>No changes.</p>
<p><b>Horley</b> - Horley needs to be in a better position to attract new and exciting businesses. We need to diversify away from estate agents, charity shops and small cafes and have more variety There has been no investment or management of the town. The is no vitality in Horley town centre, units remain vacant.</p> <p>Horley needs a dedicated regeneration programme for the town centre.</p> <p>More sustainable investment needed in Horley</p>	<p>This comment has been noted. Horley town centre has lost a number of 'destination' shops in the last 40 years, due in part to changing retail habits and the national closure of shops such as Woolworths. The Retail Needs Assessment concluded that Holey has a poor offer, with high numbers of charity and second hand stores and cafés.</p> <p>Whilst Reigate &amp; Banstead are able to control the uses of properties (i.e. shop, restaurant etc), we are unable to control which occupiers (i.e. independent stores v chain stores) occupy the premises through the planning process.</p> <p>Proposed policy RET2 seeks to improve the offer through ensuring that a retail core is maintained and not allowing planning permissions to uses such as A2 (estate agents) unless the unit is vacant and has been marketed for at least six months and that evidence can be provided that there have been attempts to let the premise for A1 use and that the</p>	<p>No changes.</p>

proposed use would make a positive contribution to the vitality, viability, balance of services and/ or evening economy.

To improve the leisure, evening and food and drink offer within the town centre, it is proposed to allow changes of use to A3 -even where this would lead to the A1 frontage falling below the prescribed level- providing that this does not lead to an overconcentration of such uses This will increase dwell time thus attracting better retail, improve the leisure offer and evening offer. Horley also has a dedicated regeneration programme, which aims to integrate the new neighbourhoods into the town and improve the town centre

A number of town centre opportunity sites have been identified for retail, community and leisure uses. It is intended that these sites will improve the offer within the town centre. In terms of identity, as outlined within the Core Strategy, Horley performs a convenience role.

As part of the 2005 Horley Masterplan, Horley town centre has had a dedicated regeneration programme which seeks to integrate the new neighbourhoods and make improvements to the town centre.. This is outlined in the Horley Town Centre Regeneration Supplementary Planning Document.

Reigate & Banstead fund the Horley Town Centre Management Group which provides practical support to local businesses. Reigate & Banstead Borough Council also offer business support grants of up to £1,000 for businesses wishing to start, develop or grow in the Borough and an Entrepreneur Academy for people who have business ideas.

<p><b>Horley</b> - I AM ALL FOR LOCAL BUSINESS TO BE BUILT UP, I LIKE THE IDEA FOR A TOWN BEING SELF SUPPORTING AND THE FACT THAT WE HAVE AN AIRPORT ON OUR DORR STEP NEEDS TO BE TAKEN ADVANTAGE OF AND NOT OVER LOOKED</p>	<p>This comment has been noted. The policies in the DMP seek to achieve a sustainable future for Reigate &amp; Banstead, including through economic growth in line with identified needs- for example DES5 requires apprenticeships for local people.</p>	<p>No changes.</p>
<p><b>Horley</b> - Most new residents of Horley will be commuter and will not help the local area. Most large scale development will be to far from the town centre and the new resident will shop in Crawley or Redhill/Reigate (or further afield) unless Gatwick related jobs can be returned/attracted (First Choice moved to Luton!)</p>	<p>This comment has been noted. Proposed policy RET2 seeks to improve the offer within Horley town centre through lowering the A1 retail frontage threshold to the current level and thus requiring marketing evidence for changes of use to A2, A4-5, D1 and D2. In order to improve the night-time and leisure economy and increase dwell time within Horley, it is proposed to allow changes of use to A3 - even where this would cause the A1 threshold to fall below the prescribed level - providing no overconcentration of such uses.</p>	<p>No changes.</p>
<p><b>Horley</b> - needs a cinema to attract more night life in the town.</p>	<p>This comment has been noted. The proposed DMP seeks to allocate leisure (and other uses) on HOR1 (High Street Car Park) and HOR6 (50-66 Victoria Road). However, planning policy is not able to control the actual users so would not be able to stipulate this should be a cinema, that would be for the market to bring forward.</p> <p>In order to improve the night time/ evening economy, it is proposed that policy RET2 allows changes of use from A1 to A3 - even where this would lead to the A1 frontage falling</p>	<p>No changes.</p>



	below the prescribed level- providing that it does not cause an overconcentration of such uses.	
<p><b>Horley</b> - Please keep the town centre as a town centre (shops, offices and places to work), replacing everything with affordable housing and flats has had a noticeable negative impact on the town centre in both the day an evening. Unless we get more offices in the town who will not have the footfall. The emphasis should be the development of a vibrant and diverse town centre in Horley, not a sprawling mass of high density flats.</p> <p>Town centre is shrinking, as the Town Centre closes down it's being replaced with flats/houses. Creating even less reason to go there.</p>	<p>This comment has been noted. National policy specifically notes (para 23 of the NPPF) that local planning authorities should recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites. However, this should not detract from the vitality and viability of a town centre.</p> <p>Proposed policy RET2 seeks to retain a retail core within Horley. It does also allow for changes of use to A3 (cafe/restaurants) - even where this would lead to the proportion of A1 retail falling below the prescribed threshold- providing that there is no overconcentration of such uses. This will improve the offer within the town centre and improve the evening offer.</p> <p>The Development Management Plan identifies a number of potential town centre opportunity sites for a mix of retail, leisure, community and residential uses. Where these are proposed in the primary shopping area, active ground floors would be required</p> <p>The Development Management Plan also proposes a revised town centre boundary for Horley, to ensure that town centre uses are constrained to this area, rather than allowing a sprawl of such uses. The need to improve Horley town centre is recognised - Horley has a dedicated regeneration programme</p>	No changes.

	<p>Whilst a number of offices within Horley town centre have changed use to residential, this is due to permitted development rights rather than planning permission being granted for a change of use. Within the last twelve months, the retail area has expanded due to the creation of new retail at Newman House and planning permission being granted for additional retail at 71 Victoria Road. Further retail is also proposed on High Street Car Park, Horley (HOR1)...</p>	
<p><b>Horley</b> - TDC residents in the Smallfield and Burstow area may make a good use of the facilities in Horley due to its proximity and the district Council would ask that the value of local shopping provisions are sufficiently considered before any allocation for redevelopment is made.</p>	<p>This comment has been noted.</p>	<p>No changes.</p>
<p><b>Horley</b> - The development in Horley town centre should be used to encourage new larger businesses to come to Horley.</p>	<p>This comment has been noted. The Retail Needs Assessment identified the need to improve the retail offer within Horley. The Council has some ability to control the use class of shop units in Horley, however, it is not able to control the individual businesses that operate from a shop unit and are therefore not able to stipulate that units are occupied by larger businesses. However, the Council intends to improve the offer and image of the town centre, which is intended to attract larger businesses. The Council intends to improve the offer through its dedicated regeneration strategy.</p> <p>The Council intends to improve the offer within Horley through not reducing the retail frontage threshold as it has for other town centres, thereby requiring planning permission for changes of use. Where a planning permission for a change of use has been proposed, evidence would be needed that the</p>	<p>No changes are proposed.</p>

	unit is no longer viable for A1 and the proposed use would add to the vitality and vibrancy of the town centre. The Development Management Plan also proposes a number of town centre opportunity sites, it is intended that these will improve the offer within the town centre.	
<b>Horley</b> - Victoria Road should be pedestrianised. This will attract more people to the centre and be safer and less noisy, and there are plenty of alternative routes to go around and about Horley.	This has been noted, however it is beyond the scope of the DMP.	No changes.
<b>Merstham</b> - very concerned about our local shopping centre in Nutfield road, Merstham as it is gradually being converted to residential. I see it is marked on your plan as a centre to be protected yet planning permission has already been granted for conversion of shops within the boundary that is marked and I worry the lose will be to the detriment of our community. and wondering where it will stop. It is eroding the community	<p>This comment has been noted. Nutfield Road is currently designated as a local centre and it is intended that this designation will continue to be carried forward.</p> <p>For changes of use to residential, the Development Management Plan proposes that the property must have been vacant and marketed for at least 6 months and marketing evidence (namely methods, rent and whether this rent is reflective of the local market) are required.</p>	No changes.

<p><b>Nork</b> - it is a question of sustaining our present communities which in the case of Nork has an excellent local shopping centre but needs attention to parking provision and attractiveness to encourage local residents to continue to shop there but also to provide good and efficient public transport to main towns within those areas - sadly lacking in Nork with a very limited bus service to Epsom and Croydon and a limited train and no direct bus service to Sutton.</p>	<p>This comment has been noted. Comments regarding existing parking and public transport are however not an issue that can be dealt with through the DMP. For new development Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No changes.</p>
<p><b>PE4</b> - stop building new office, new companies buy up space in Reigate town centre, reduce business rates for shops and attract decent shops</p>	<p>Comment has been noted. Business rates are unable to be controlled through the Development Management Plan.</p>	<p>No changes.</p>
<p><b>PE4</b> - Absolutely but in order to achieve this, again there must be a balance between affordable vs middle to upper tiers brands and stores. Redhill in particular has far too many charity and pound shops which do not attract young professionals to move to or shop in the area.</p>	<p>This comment is noted. Whilst the Council has some ability to control the use class of shop units within town centres, it is not able to control the individual businesses that operate from a shop unit (unless that unit is owned by the Council). The adopted Core Strategy identified the need to improve Redhill as a retail destination. Schemes such as the Marketfield Way redevelopment are intended to attract middle-to-upper brands.</p> <p>Redhill has a dedicated regeneration programme, the objective of which are ensuring that Redhill is a vibrant place to live, shop and work; a commercial location of choice;</p>	<p>No changes.</p>

	develop, diversify and manage Redhill's evening economy; create real benefits for local residents and local businesses; and improve the physical appearance of the town centre.	
<b>PE4</b> - Again, this question is obtuse, deliberately. It is clouded in suggestions that the town centre should expand. It cannot expand. It has reached its limits. Reigate is a market town. You are attempting to add more mice in a cage than the cage can accommodate. The quality of people's lives will suffer	<p>This comment has been noted. This objective intends to ensure the vitality, vibrancy and viability of town centres through ensuring that our proposed retail policies are flexible enough to allow a range of uses within the town centres and protects the town centres from competing out-of-town retail.</p> <p>Reigate &amp; Banstead Borough Council have worked with Surrey County Council in order to understand the potential traffic impacts of the proposed development outlined in the Development Management Plan. The Infrastructure Delivery Plan Evidence Paper is available on the Council's website. The Retail Needs Assessment concluded that the additional floorspace need could be met through allocated sites in the DMP (REI1 and REI2) and minor extensions and improved performance of existing floorspace rather than further large development sites.</p>	No changes.
<b>PE4</b> - but not to the extent that shops are left empty for months and months.	This comment has been noted. Changes of use will be considered favourably for units which have been vacant for at six months providing marketing evidence demonstrates that the property has been actively marketed at an appropriate rent/ price.	No changes.

<p><b>PE4</b> - ensure pedestrian/cycle access are safe however, we do need to make sure vehicular access is also available otherwise "shoppers" will travel elsewhere and links to other transport is vital.</p>	<p>This comment has been noted. The Borough Council are not in control of pavements, cycle lanes and road - this is the remit of Surrey County Council who also manage the majority of bus provision. Some services, such as rail provision, is managed by independent business which again is outside the control of the Borough Council, although we do engage with all these parties to ensure our plans are robust and joined up.</p>	<p>No changes.</p>
<p><b>PE4 - Horley</b> - offices are becoming more flats. Doesn't make sense. Too many empty shops. And another new barbers. Let's have some brand name shops to drive people into the shops. Or reduce your fees. Get rid of parking charges under 2 or 3 hours. Works in oxted</p>	<p>This comment has been noted. Horley has lost a number of office blocks due to national permitted development rights allowing the change of use from offices to residential without requiring planning permission. The other town centres have also lost office floorspace.</p> <p>The Retail Needs Assessment concluded that Horley had a poor offer, with a high number of charity and second hand stores and cafes. In order to improve the retail offer, it is not proposed to lower the retail frontage threshold as is proposed in other town centre. This will ensure that a retail core is provided and prevent changes of use to other uses, such as A2, without evidence that the unit is no longer viable. However, to improve the food and drink provision, leisure and evening economy, it is proposed to allow changes of use from A1 to A3, even where this would lead to the A1 frontage threshold falling below the prescribed level, providing that it does not lead to an overconcentration of such uses.</p> <p>Whilst Reigate &amp; Banstead are able to control the uses of properties (i.e. shop, restaurant etc), we are unable to control which occupiers occupy the premises through the planning process (unless we own these premises) and therefore are unable to stipulate that the units are occupied by brands. In terms of parking charges, this is something that cannot be</p>	<p>No changes.</p>

	controlled through the Development Management Plan.	
<b>PE4</b> - Imperative that certain licensed premises in Redhill do not put off businesses coming to the area. The football pub and The Sun.	This comment has been noted. The DMP however has no remit to interfere with existing businesses outside of the role of planning i.e. should an existing business want to extend their premises.	No changes.
<b>PE4</b> - Market forces should deliver this. It isn't the place of government to intervene. If local Govt owns any property then it can achieve this in part by reducing commercial rents and parking charges to a level that supports successful businesses while still raising some money. NB I'm not arguing for free shop units, I'm suggesting that someone with proper commercial acumen reviews these on a regular basis.	This comment has been noted. The Council seeks to protect the vitality and viability of the borough's town centres through ensuring that competitive out of town retail is not provided and ensuring that the planning system is reflective of the needs of the town (i.e. allows changes to restaurants in Horley and Redhill - even where this would take the A1 retail frontage below the threshold - as this sector was identified as needing improvement in the Retail Needs Assessment).	No changes.
<b>PE4</b> - Proposals for additional retail space should not be approved where there is a significant amount of vacant retail or office space. Developers should be encouraged to acquire and re-use this space if it does not meet their requirements	This comment has been noted. Reigate & Banstead Borough Council monitor town centre (and local and industrial estates) on a quarterly basis. This allows us to monitor the amount of vacant floorspace. The town centres in the Borough have historically had low levels of vacant units and there will always be a few vacant units due to natural churnage. New developments will help improve the town centres as retail destinations and lead to new occupiers moving into these premises. The Retail Needs Assessment identified the retail needs over the plan period, and this information has been used to inform the new developments proposed. New developments will not be permitted if they lead to the retail frontage thresholds	No changes.

	falling below the prescribed levels.	
<b>PE4</b> - There needs to be a balance between vitality and viability together with housing, given the population and nearness of the station for commuting.	This comment has been noted. This is what the policies seeks to achieve, including the value of residential uses at upper floors within the town centre in order to improve the natural surveillance within the town centre.	No changes.
<b>PE4</b> - This includes allowing areas to maintain their own character, e.g. ensuring Redhill and Reigate remain distinct but with appeal at both, so people feel more inclined to visit both centres (e.g. people from Reigate don't want more large chains, but would travel to Redhill for these, which would help with local economy). Shuttle bus between the two areas would also assist with this.	This comment has been noted. A shuttle bus is not something the DMP can require, and there are regular train and bus routes between the town centres. The policies seek to protect the nuances of the different town centres, with the figures in RET2 for % of A1 uses tailored to each town centre.	No changes.
<b>PE4</b> - This will only be provided by increasing footfall and giving the consumer the sort of shops and services they require! Lower business rates and offices located in the town centre will increase footfall	<p>These comments have been noted. Commercial business rates are unable to be dealt with through the DMP.</p> <p>Whilst Reigate &amp; Banstead Borough Council are not proposing any new offices in any of the town centres, national policy says that these are a town centre use, and are therefore encouraged within the Borough's town centres. The policies in the DMP seek to reflect nuances of the different town centres, with the figures in RET2 for % of A1 uses tailored to each town centre whilst allowing the flexibility for town centres to evolve in line with future changes</p>	No changes.



<p><b>PE4</b> - This would include limits on the power of supermarkets to dominate other local traders and put them out of businesses</p>	<p>This comment has been noted. It is however not possible to do this through the DMP.</p>	<p>No changes.</p>
<p><b>PE4</b> - Town and local centres should stay retail and not be converted.</p>	<p>This comment has been noted. Proposed policy RET3 recognises that local centres provide an important function, serving the needs of local communities. However, it recognises that in some cases units are no longer viable. Should a unit be proposed for another use, marketing evidence would be required to demonstrate that the unit is no longer viable.</p> <p>National policy specifically notes (para 23 of the NPPF) that local planning authorities should recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites. However, this should not detract from the vitality and viability of a town centre.</p> <p>Proposed policy RET2 seeks to retain a retail core in all the town centre, although varies the % required depending on local circumstances.</p>	<p>No changes.</p>

<p><b>PE4</b> - Town Centres clearly need to be competitive in order to function well economically and a fundamental goal of the DMP must be to improve the catchments competitiveness. The various strategies the DMP will adopt to specifically achieve this elevated level of competitiveness need to be made more transparent in the Consultation document.</p>	<p>This comment has been noted. Competitiveness is important to ensure that retail expenditure is retained within the Borough. However, it is recognised that the Borough's towns are smaller than nearby centres and provide a different offer. The Core Strategy recognises the need to improve the retail offer within Redhill and enhance its role as the Borough's primary retail destination. In order to achieve this the Development Management Plan proposes a number of town centre opportunity sites. Redhill's Area Action Plan also provides objectives of the regeneration planned for Redhill. It is felt that this is transparent enough, in order to improve the competitiveness of the town centres, we are not proposing anything that is not already within either document. The various evidence base document (available here: <a href="http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/761/dmp_-_evidence">http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/761/dmp_-_evidence</a>) including the retail needs assessment 2016 provides more background detail</p>	<p>No changes.</p>
<p><b>PE4</b> - Viability of course means reducing costs as above. Not sure how one defines vitality but if this means improving visual aspects such as tree planting ,street furniture and improving standard of decoration (sadly needed in places) then I agree.</p>	<p>This comment has been noted. In part viability/ vitality/ vibrancy includes visual aesthetics, it also relates to being able to respond to retailer and customer demands</p>	<p>No changes.</p>
<p><b>PE5</b> - Local convenience are essential, ensuring open/ free car parking is vital for their success.</p>	<p>This comment has been noted. Local centres are something which the DMP seeks to protect to ensure that local convenience is provided throughout the borough, they are recognised as being important to meeting the everyday needs of local communities. Parking charges are however not an issue that can be dealt with through the DMP.</p>	<p>No changes.</p>

<p><b>PE5</b> - Agreed. But Reigate shops do not seem to suffer from constant turnover of businesses - adding an unnecessary amount of additional housing will not help this</p>	<p>This comment has been noted. Additional housing numbers will increase the potential number of customers and potential spend within the area which may in turn make businesses more profitable.</p> <p>National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year.</p>	<p>No changes.</p>
<p><b>PE5</b> - Areas exist where people want to use them. If they are struggling is likely due to poor demand</p>	<p>Comment has been noted. Proposed objective PE5 seeks to ensure the viability of smaller local shopping areas but recognises that in some cases units may no longer be viable or required. Should a unit be no longer viable or required, and evidence can be provided to support this claim, changes of use will be allowed.</p>	<p>No changes.</p>

<p><b>PE5 - Chipstead Parade (retained)</b> - The assessment made commented upon the vacant units by the station and that letting them would improve the viability of the parade and in their dilapidated condition, maintaining them would make letting more likely.</p> <p>Network Rail owns these properties and the land but lets the portion of land around Chipstead station to the franchised train operator for the term of their franchise. We understand that Southern Rail are considering removing the buildings to develop the car park at their expense and would then apply parking charges if the development goes ahead. It all depends whether costs can be recovered within the term of their franchise.</p> <p>Therefore, our comments are that the empty and dilapidated units are unlikely to change given the current plans and implementing charges for parking could affect the character of the parade. The boundary, as drawn, includes all the land under owned by Network Rail.</p> <p>Rectory Lane (new designation) – we have no objection to this being identified as a local centre but the boundary appears to take in both Pine Walk and the Baptist Church and as such the logic for this needs to be explained.</p>	<p>Chipstead Parade: It is felt that as a planning application has not been made for the demolition of the units, that the boundary should still include these units. Should the units be demolished then the boundary could be amended in the future.</p> <p>Parking charges are not something the DMP can control</p> <p>Rectory Lane: It is intended to include the Baptist Church as it performs a community function. The entrance to the church is via Pine Walk, this is why it is included within the boundary.</p>	<p>No changes.</p>
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<p><b>PE5</b> - I am in favour of and would support small business that offer and add value to the community. Size of business is not necessarily a factor of success but rather innovation, quality and value can complete against larger businesses and this can only improve quality of life and services within the community. Reigate is a perfect point in case example.</p>	<p>This comment has been noted.</p>	<p>No changes.</p>
<p><b>PE5</b> - I am not sure that more local developments will be viable with major shopping centres so close to hand. We were talking to a neighbour this morning and I mentioned that South Merstham used to have a shoe shop. Can you imagine that today? the world has changed.</p>	<p>This comment is noted. Proposed policy RET3 recognises that local centres play an important role in serving the local needs of communities, and providing shops, services and facilities that are easily accessible. It is however recognised that in some cases these units are no longer viable, should evidence be provided that the units are no longer viable then changes of use will be granted.</p>	<p>No changes.</p>
<p><b>PE5</b> - I can only think of two, Horley Row and Brighton Rd, neither of which has any empty shops (well maybe one)</p>	<p>This comment has been noted. This proposed objective seeks to ensure the vitality of the local centres through for example, ensuring that proposed changes of use from A1-A3, D1/2 are only allowed where marketing evidence shows that the unit is no longer viable. Brighton Road, Horley is an existing local centre, a designation which is intended to be carried forward. Horley Row is not an existing local centre, nor was it identified as a potential local centre. Horley Row has been assessed as a potential local centre against the criteria outlined in the Local Centre Development Management Plan.</p>	<p>Horley Row has been designated as a local centre</p>
<p><b>PE5</b> - I think that this is lower priority than PE4</p>	<p>This comment has been noted. It is not intended that these policies are ranked.</p>	<p>No changes.</p>

<p><b>PE5</b> - If houses are built then other small shops are needed but the town centre needs development</p>	<p>This comment has been noted. It is felt that the retail policies aim to protect and encourage the diversity of uses within the town centres, local centres and small/ stand alone local shops. Small scale retail are proposed on SSW2 only.</p>	<p>No changes.</p>
<p><b>PE5</b> - Local shops are very much needed especially where bus services are poor. But we are losing local shops because rents are too high. For example some shops on the Western side of South Merstham Parade are being converted to flats because this gives a much higher rental income.</p>	<p>This comment has been noted. Proposed policy RET3 recognises that local centres play an important role in serving the needs of local communities, providing shops, services and facilities that are easily accessible and reduce the need for travel. Rents are not something that can be controlled through the DMP</p>	<p>No changes.</p>
<p><b>PE5</b> - Oligopoly of chain stores should be prevented to ensure diversity. Support local businesses and not allow chains to bully way in, e.g. Reigate high street already being taken over by large restaurant chains when it has so many local thriving businesses this is a shame</p>	<p>This comment has been noted. Whilst Reigate &amp; Banstead are able to control the uses of properties (i.e. shop, restaurant etc), we are unable to control which occupiers occupy the premises through the planning process (unless we own these premises).</p>	<p>No changes.</p>
<p><b>PE5</b> - supported subject to appropriate flexibility and avoidance of policies which simply seek retention of shop units notwithstanding market evidence.</p>	<p>This comment is noted. The retail policies seek to protect viable units, however it is recognised that in some cases units are no longer viable. Should marketing evidence be provided that the units are no longer viable then changes of use will be supported.</p>	<p>No changes.</p>

<p><b>PE5</b> - The local shopping areas do not need expansion. Protect the viability is another obtuse suggestion. By protecting the viability you are clearly suggesting populations in areas on the outskirts and outside the town should expand, beyond the capability of the space those areas are able to tolerate. Increased traffic and housing development will bring pollution and overcrowding.</p>	<p>Noted. This objective relates to retail policy rather than housing. Minor changes are proposed to the local centre boundaries to reflect factors such as changes of use. These are detailed in the DMP Local Centre Evidence Paper.</p>	<p>No changes.</p>
<p><b>PE5</b> - These are the heart of many communities and need supporting, but also improving. However maintaining character is crucial. Local convenience are essential, ensuring open/ free car parking is vital for their success.</p>	<p>This comment has been noted. Proposed retail policy RET3 seeks to ensure the viability and vitality of the local centres through ensuring that changes of use resulting in the loss of A1-A3 and D1/2 will only be permitted where marketing evidence demonstrates that the unit is no longer viable.</p> <p>Proposed retail policy RET5 seeks to ensure the viability and vitality of the local centres through ensuring that competing retail is not located outside local centres.</p> <p>In terms of character, proposed policy DES1 seeks to ensure that all types of development are of a high quality reflecting the local character of the area. Parking charges are however not an issue that can be dealt with through the DMP.</p>	<p>No changes.</p>
<p><b>PE5</b> - This I support but has been shown on The Acres estate there has been no take up of small shops.</p>	<p>This comment has been noted. Barratts Wates (Horley) Ltd have let the three units in the Acres Neighbourhood Centre, the new owner is understood to be intending to open a NISA convenience store.</p>	<p>No changes.</p>

<p><b>PE6</b> - Again obtuse. This is suggesting using the policies of the 1960s of expansion and development at all costs offering the population easy access to consumerism is a priority objective...people on the waiting list/housing need affordable homes. Your plans are not offering a solution to this problem. ...you are robbing people of green spaces to build 70% private housing and 30% affordable housing does not resolve or solve the set of problems you have been asked to resolve. you are accommodating the wishes of greedy developers ...and no wish to house those people who are unable to afford to purchase large semi-detached or detached homes</p>	<p>The affordability of housing within the borough is recognised as a key concern of local residents. Proposed policy DES7 requires developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership. The requirements for affordable housing are set out in the affordable housing SPD. This policy, and policy DES5, seeks for a range of housing sizes and tenures to be provided in order to enable more balanced communities, to ensure choice but also to enable people to remain within the communities in which they are a part of. 30% affordable housing is the level that was demonstrated to be viable across most value areas - more information on this can be found in the Inspectors Report on the Core Strategy - which can be found here <a href="http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/24/core_strategy">http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/24/core_strategy</a>. 35% affordable housing is sought on allocated greenfield urban extension sites.</p> <p>Objective PE6, however, is to do with retail and seeks to ensure that town and local centres are able to respond to changing retail needs. This objective will be delivered through Policies RET 1 - 6</p>	<p>No changes.</p>
<p><b>PE6</b> – By not doing anything we are going to create a ghost town that will be full of coffee shops</p>	<p>This comment has been noted. In preparing the Development Management Plan, all of the retail policies were examined in relation to current trends, past performance and national policy requirements. To ensure that both town and local centres are resilient and able to respond to future changes, town and local centre policies (RET2 and RET3) are proposed which seek to control the uses within these areas.</p>	<p>No changes.</p>



<p><b>PE6</b> - Capacity planning is key - car parking has not been expanded at the same rate as population expansion, it is already limiting. E.g. I drive to Gatwick Tesco from Reigate instead of shopping in Redhill or Reigate because it is easy to park at Gatwick Tesco.</p>	<p>This comment has been noted. Works are ongoing by other teams in the Council to assess the potential to improve existing parking within Reigate. Any new development would need to provide parking in line with the parking standards.</p> <p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers to understand the need/ impact of the proposed development outlined in the Development Management Plan.</p>	<p>No changes.</p>
<p><b>PE6</b> - Depends on details. I.e. bypasses could be seen as helping to respond to future changes (I.e. if changes to airport capacity require better roads), and I would not support that</p>	<p>This comment has been noted. This objective relates to the retail uses within the town and local centres (proposed policies RET2, RET3, RET4) rather than infrastructure.</p>	<p>No changes.</p>
<p><b>PE6</b> - 'future changes' does not mean CARTE BLANCHE for 'developers'. Interests of local people, however modest, must always come first.</p>	<p>This comment has been noted. Proposed objective PE6 seeks to ensure that both town and local centres are resilient and able to respond to future changes. This means ensuring the viability, vitality and vibrancy of the town and local centres, for example through ensuring a mix of uses. It also means allowing the change of use of units which are no longer viable, providing marketing evidence can be provided. It does not mean that developers can do as they want, it is to ensure that town and local centres continue to support communities.</p>	<p>No changes.</p>
<p><b>PE6</b> - Not seen any mention of energy provision which is key. Would like to see stringent on site renewable requirements</p>	<p>This comment has been noted. Policy CCF1 covers energy provision</p>	<p>No changes.</p>
<p><b>PE6</b> - Not sure what this means...perhaps building them out of Lego? I would suggest not trying to redevelop town centres any more frequently than every 30 years. Economic and social change may be</p>	<p>This comment has been noted. Proposed objective PE6 seeks to ensure that both town and local centres are resilient and able to respond to future changes. This means ensuring the viability, vitality and vibrancy of the town and local centres, for example through ensuring a mix of uses. It also</p>	<p>No change.</p>

<p>difficult to respond to easily through the planning control of future development.</p>	<p>means allowing the change of use of units which are no longer viable, providing marketing evidence can be provided.</p> <p>Proposed policy DES1 seeks to ensure that new development is of a high quality which reflects local character.</p>	
<p><b>PE6</b> - Support on basis that the focus is on town centres and future perceived changes are not a reason to support urban sprawl. Further urban sprawl without focussing on and achieving/building (rather than just grant planning) the core would lead to congested highways, and unbalanced demographic and unpleasant Town Centre environment damaging any future growth prospects. Concentrate on the core.</p>	<p>This comment has been noted. It is not intended that this objective will lead to urban sprawl. Town Centre boundaries are outlined on pages 27 and 28.</p>	<p>No changes.</p>
<p><b>PE6</b> - To fulfil this objective, policies will need to be flexible to allow town and local centres to adapt to market signals and requirements. Policies should enable changes of use between retail and other compatible uses rather than seeking to retain A1 uses only at all costs.</p>	<p>This comment has been noted. The A1 retail frontage thresholds have been reviewed in preparation of the Development Management Plan to take into consideration the actual A1 rate; vacant units and vacancy patterns over time; planned and proposed changes to the town centres; and the findings from the Retail Needs Assessment.</p> <p>It is felt that there is a need for an A1 requirement to ensure a retail core is retained within the town centres. For Redhill and Horley, where there is a need to improve the food and drink offer, it is proposed to allow changes to use to A3 - even where this would lead to the A1 frontage threshold falling below the required level - providing that it does not lead to an overconcentration of such uses. The retail policies are intended to be flexible, where the unit is vacant and has been marketed for six months and evidence can be provided that the unit is no longer viable, changes of use will be permitted.</p>	<p>No changes.</p>

<p><b>PE6</b> - You can't possibly achieve this. It's a capability that's unmeasurable and could take lots of resources for an uncertain outcome. Better to make your plan adaptable as and when specific changes become known.</p>	<p>Noted. Proposed objective PE6 seeks to ensure that both town and local centres are resilient and able to respond to future changes. This means ensuring the viability, vitality and vibrancy of the town and local centres, for example through ensuring a mix of uses. It also means allowing the change of use of units which are no longer viable, providing marketing evidence can be provided.</p> <p>It is proposed that this objective will be met through proposed policies RET2, RET3, RET5 and RET6.</p>	<p>No changes.</p>
<p><b>Proposal Map</b> - The proposed policies make no reference to the proposed Primary Shopping Area. We consider it anomalous that a defined spatial policy constraint has no corresponding policy reference.</p> <p>As currently written the policies together would provide more flexibility to enable town centre uses to be located at any location within the identified Redhill Town Centre, including within the areas previously defined as the Town Centre Business Areas to the north of the established shopping area.</p> <p>Suggest that the wording of Policies RET1 and RET2 is strengthened. This should be in the form of directing any new Class A retail uses within the town centres to the Primary Shopping Area in the first instance.</p>	<p>This comment is noted. The primary shopping area is defined in the Development Management Plan Town Centre evidence paper as 'a defined area where retail development is concentrated, generally comprising the primary and those secondary frontage which are adjoining to the primary frontage'.</p> <p>It is proposed that this definition is included within proposed policy RET2. With the definition included, and the maps delineating the areas, it is not felt that there is a need for a specific policy.</p> <p>The primary shopping area outlines the area in which the retail facilities should be concentrated within the town centre boundary, this designation will prevent retail being permitted in the former Town Centre Business Area.</p>	<p>Amend wording before proposed policy RET2 to include definitions of town centre boundaries, primary shopping areas, primary shopping frontages and secondary shopping frontages.</p>

<p><b>Redhill</b> - A thriving Town Centre requires quality infrastructure, access and egress, appropriate retail/leisure/community facilities and relevant housing stock. The current state of Redhill allows for a vast improvement in ALL these areas to create a thriving core which should be the focus of both the Government and Council .</p>	<p>This comment has been noted. Redhill town centre has a dedicated regeneration programme which seeks to improve these issues. The adopted Core Strategy recognised the need to improve Redhill and to enable it to fulfil its role as the primary town centre of the Borough. The policies and site allocations in the DMP have been informed by working with infrastructure providers, carrying out Transport modelling with Surrey County Council to understand impact on roads, a retail needs assessment has been carried out to inform retail needs and our site allocations have been identified to meet our identified housing need and housing targets.</p>	<p>No changes.</p>
<p><b>Redhill</b> - Centre of Redhill needs massive regeneration to encourage retail presence. existing work a start but incentives needed to encourage retailers onto high street not just in the Belfry - perhaps around business rates.</p>	<p>This comment has been noted. The adopted Core Strategy recognised the need to improve the retail offer within Redhill to enable the town centre to perform its role as the primary town centre of the Borough.</p> <p>Redhill town centre has a dedicated regeneration programme. It is intended that developments such as Marketfield Way which has recently been granted planning permission will improve the retail offer within the town centre.</p> <p>Proposed policy RET2 also seeks to improve the offer within the town centres through for example allowing changes of use from A1 to A3 - even where this would lead to the A1 frontage threshold falling below the prescribed level - providing that it does not lead to an over concentration of uses. This will improve the food and drink, leisure and evening activities within the town centre.</p> <p>Business rates are not able to be dealt with through the Development Management Plan.</p> <p>The Development Management Plan also identifies a number of town centre opportunity sites to improve the offer within</p>	<p>No changes.</p>

	Redhill. Proposed policy DES1 seeks to ensure that new developments are of a high quality design which reflects local character.	
<b>Redhill</b> - I do think the town centre needs to be a mix of business, retail, leisure and residential which would keep the centre alive for longer .	This comment has been noted. This is in line with the proposals of the Development Management Plan and national planning policy.	No changes.
<b>Redhill</b> - It is disappointing that progress with the development of Redhill is so slow. If we are not careful neighbouring boroughs will prove more attractive to shops and businesses.	This comment has been noted. Redhill has a dedicated regeneration programme and its aims are outlined in the Redhill Area Action Plan. However, speed of progress with development is not something the DMP can control	No changes.
<b>Redhill</b> - More needs to be done to make the differential between views of Redhill and Reigate lesser. Redhill has potential to be great if the right shops and restaurants were available to incentivised to stay rather than being the "poorer" sister to Reigate. An example is coffee shops and restaurants for which there are a plethora in Reigate but limited few in Redhill (even Frankie and Benny's is leaving!). Initiatives to support local businesses through pop up locations mixed with strong national brands would be encouraging. There needs to be a rebalance. New accommodation and better facilities will help this and developers need to be pressed on this.	<p>This comment has been noted. The adopted Core Strategy recognised the need to improve the retail offer within Redhill to enable the town centre to perform its role as the primary town centre of the Borough.</p> <p>Redhill has a dedicated regeneration programme. Proposed policy RET2 seeks to improve the offer within the town centre through for example allowing changes of use from A1 to A3 - even where this would lead to the A1 frontage threshold falling below the prescribed level - providing that it does not lead to an over concentration of uses. This will improve the food and drink, leisure and evening activities within the town centre.</p> <p>The Retail Needs Assessment identified a need for 10,000sqm of comparison floorspace to be provided in Redhill and Reigate over the plan period. It is intended that the majority will be provided in Redhill.</p> <p>The Development Management Plan also identifies a number</p>	No changes.

	<p>of town centre opportunity sites to improve the offer within Redhill. Proposed policy DES1 seeks to ensure that new developments are of a high quality design which reflects local character.</p> <p>Whilst Reigate &amp; Banstead are able to control the uses of properties (i.e. shop, restaurant etc), we are unable to control which occupiers occupy the premises through the planning process (unless we own these premises). We are therefore unable to require new premises to be occupied by national brands. It is however hoped that the improvements to the town centres and additional retail units will improve the offer.</p>	
<p><b>Redhill</b> - pg. 24, Policy CS7 states that Redhill will take the borough's comparison and convenience retail growth with no further development in Reigate. Such retail units are often lower end (particularly comparison units), Redhill already has an unattractive high street and does not need further stores of this nature. Furthermore, it feels protecting Reigate and Banstead/Kingswood at the expense of Redhill should not be the Borough council's <i>raison d'être</i>.</p>	<p>This comment has been noted. Policy CS7 is an adopted Core Strategy policy. The Core Strategy plans to maintain a constant retail market share across the Borough as a whole, but in the short term, to frontload the floorspace requirements, and to direct the majority of this retail growth to Redhill in order to promote itself as a retail destination and the primary town centre in the Borough. Proposed policy DES1 seeks to ensure that new buildings are delivered to a high standard and are designed sensitively to the local character of the area. The Council wishes to improve the offer within Redhill and make it more of a designation. Proposed policy RET2 seeks, for example, to improve the food and drink, leisure and evening economy through allowing changes of use to A3, even where this would lead to the A1 frontage falling below the prescribed threshold, providing that it does not lead to an overconcentration of such uses. A number of town centre opportunity sites are also proposed in the Development Management Plan in order to improve the leisure, retail and community uses within the Redhill town centre, as well as the other town centres across the borough. Redhill has a dedicated regeneration programme.</p>	<p>No changes.</p>

<p><b>Redhill</b> - The town centre of redhill is not very prosperous and it is partly due in my opinion to the lack of diversity in the shops.</p>	<p>This comment has been noted. Proposed policy RET2 seeks to improve the offer within the town centre through reducing the primary and secondary retail frontages to allow for a greater variety of uses.</p> <p>Proposed policy RET2 seeks to also allow changes of use to A3 even where this would lead to A1 retail falling below the prescribed threshold, providing that this does not lead to an overconcentration of such uses.</p>	<p>No changes.</p>
<p><b>Redhill</b> - There is no need for Redhill to become another Croydon or Crawley, given there are adequate public transport links to those towns for those who require the greater choice of retail outlets. The number and choice of retail and leisure outlets should seek to complement rather than compete with those in Croydon and Crawley, and every effort should be made to avoid simply replicating the brands, frontages and architectural styles prevalent in those towns. Individuality and quirkiness should play a part in giving the town and local centres their own character. Sadly the centre of Redhill, including the new Sainsbury's development and office buildings, is already bland and uninteresting; and likely to become more so.</p>	<p>This comment has been noted. The adopted Core Strategy seeks to improve Redhill as a retail destination. Given the different scales of the town centres, it is not intended that Redhill would compete with Croydon or Crawley, but rather complement these towns. Proposed policy DES1 seeks to ensure that new development is of a high quality which reflects local characteristics.</p>	<p>No changes.</p>
<p><b>Reigate</b> - Be a bit more flexible on commercial rents. They are clearly too expensive, especially on Reigate High St. Loss of some of our long standing</p>	<p>This comment has been noted. However commercial rents are not an issue which can be dealt with through the DMP.</p>	<p>No changes</p>

independent shops in the past few years is very sad.		
<b>Reigate</b> - Never pedestrianize the high street - it would die like so many others have	This comment has been noted. This is not within the remit of the DMP	No changes
<b>Reigate</b> - Pedestrianize Reigate High Street, will enhance the area and surrounding areas. Pedestrianizing Reigate High Street will visually enhance the area, encourage businesses to flourish, and generally increase the quality of life of the people in the local and surrounding areas.	This comment has been noted. This is not within the remit of the DMP	No changes.
<b>Reigate</b> - Redevelop the Morrisons car park to be a multi-storey to increase capacity - 3 floors, would make Reigate vibrant again.	This comment is noted. This is not within the DMPs remit but other departments in the Council are looking into parking provision across the borough	No change.
<b>Reigate</b> - The current policy in Reigate seems to be to turn all the retail outlets into eating places	Comment has been noted. The Retail Needs Assessment concluded that Reigate has a good representation of food and drink units but that saturation had not been reached. Proposed policy RET2 seeks to allow changes of use to A3 for Redhill and Horley, even where this would lead to the percentage threshold of A1 units falling below the prescribed threshold providing that it would not lead to a concentration of such uses. This is not proposed for Reigate.  Reigate & Banstead Borough Council recently refused	No change.



	planning permission for a change of use from A1 to A3 (15/02290/CU - 33-35 Bell Street) however this was subsequently allowed at appeal.	
<b>Reigate</b> - The one way system in Reigate should be built around the High Street, not through it	This comment has been noted. This is not within the remit of the DMP	No changes.
<b>Reigate</b> has very few empty shops. We have lots of restaurants visited by people who live near and further away. Reigate is THRIVING and has in my opinion reached its PEAK. Morrisons car park is full to bursting the park is well used- we don't need this to be ruined by population OVERLOAD.	<p>This comment is noted. Reigate &amp; Banstead Borough Council have worked with Surrey County Council in order to understand the potential traffic impacts of the proposed development outlined in the Development Management Plan. The Infrastructure Delivery Plan Evidence Paper is available on the Council's website. The Retail Needs Assessment concluded that the additional floorspace need could be met through allocated sites in the DMP (REI1 and REI2) and minor extensions and improved performance of existing floorspace rather than further large development sites.</p> <p>Where new development is proposed, policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	No changes.

<p><b>Rent</b> - Private landlords should be forced to reduce or cap the rent they ask for, to encourage local businesses to set up in the centre of Banstead.</p>	<p>This comment has been noted. This is however something that cannot be done through the Development Management Plan.</p>	<p>No changes.</p>
<p><b>RET 2</b> - The reduction of the proportion of A1 retail (as opposed to service uses such as banks, estate agents, take-away and restaurants) from 75% to 65% will significantly impact upon the character and viability of the village and the High Street.</p>	<p>It is felt that 65% is the appropriate retail frontage threshold given the increase in the number of vacant units within the last couple of years. When determining the threshold levels consideration has been given to the actual A1 rate; vacant units and vacancy patterns over time; planned and proposed changes to the town centres; and findings from the Retail Needs Assessment.</p>	<p>No changes.</p>
<p>RET2 - The proposed large scale retail development to expand the High Street west of Bolters Lane to a section of the Horseshoe is unjustified, unnecessary and inappropriate. The impact of the proposed retail development on car parking provision does not appear to have been fully assessed and significant work is required to make it function adequately for Banstead. probable lack of demand and dilution of the centre's core</p>	<p>As detailed in the DMP Town Centre Evidence Paper, Reigate &amp; Banstead Borough Council are proposing to extend the town centre boundary to include the Horseshoe due to the community and proposed small scale retail uses proposed in this area - it is felt that these are town centre uses and should therefore be included within the town centre boundary. In terms of retail within Banstead, the Retail Needs Assessment identified the need for approximately 1100sqm of comparison floorspace by 2027, increasing to about 1,800sqm by 2032. It is felt that this area would be a natural extension to the high street.</p> <p>Should development be proposed for this area, it would have to be a comprehensive redevelopment. The small extension of the high street would support potential small scale retail, leisure, community or other leisure facilities but the site allocation stipulates that these elements would only be appropriate where this would be enabling development to support the improvement of existing/other community facilities. It is not intended to compete with the existing town</p>	<p>No changes.</p>

	<p>centre but rather complement.</p> <p>where new development is proposed Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets</p>	
RET2 1b) the definition of over concentration of A3 units should be in the policy and not the reason section.	Definition of overconcentration has been added to the policy rather than being in the reasons	Overconcentration definition added to the policy
RET2 - it is important that applicants can show that premises have been adequately marketed on reasonable terms before a change of use is accepted.	the marketing requirements have been amended to require more robust marketing, including information on marketed sales/rent levels.	Marketing requirements updated
RET2 - 2c) D1 uses should also be favourably considered as these are appropriate to town centre uses.	The comment regarding D1 uses has been noted and has been taken on board - to be included in the policy	RET2 to include D1 uses.

<p>RET2 - Suggest that there be a policy of encouraging small, independent shops, although we appreciate that this would be difficult to implement/ enforce..</p>	<p>Whilst Reigate &amp; Banstead are able to control the uses of properties (i.e. shop, restaurant etc), we are unable to control which occupiers occupy the premises through the planning process (unless we own these premises). We are therefore unable to require the units to be occupied by small/ independent stores.</p>	<p>No changes.</p>
<p>RET2 - Because of the lack of public transport to the centre, we also suggest that there should be a more generous provision of public car parking, particularly at the eastern end, as few shoppers go to the centre by public transport and the existing car parks are sometimes full and there is a problem of parking in residential areas..</p>	<p>Parking charges and existing parking provision are an issue which cannot be dealt with through the Development Management Plan. However, where new development is proposed Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No changes.</p>

<p><b>RET 2</b> - example of where this old policy has shown its lack of flexibility - Wagamama application. More flexible approach and the old percentages of A1 reduced to reflect the changing town environment. How will you deal with a restaurant that sells products as well of is a pick up place for Amazon. A1 and A3 uses does fit into neat boxes.</p> <p>Future changes are naturally hard to predict, but with heavily populated areas such as ours, there will always be a call for day to day needs, and we must be able to offer these facilities, and with ease of access.</p> <p>With changing shopping habits it is very difficult to forecast what might be needed. Town Centre shops need to have specialist outlets. local plan needs revising, historical caveats on retail mix are stymying the High Streets. The high street, country and communities are ever changing and need to evolve for survival, more so than ever now we have left Europe.</p>	<p>This comment has been noted. Whilst it is appreciated that retailing habits are changing, it is felt that there is a need for an A1 threshold as there is a need for an A1 retail core to be retained within the town centres. The A1 retail thresholds have been revised taking into consideration the actual A1 rate; vacant units and vacancy patterns over time; planned and proposed changes to town centres; and findings from the Retail Needs Assessment. Should a unit no longer be viable for A1 and marketing evidence can be provided to demonstrate that the unit is no longer viable, then changes of use will be permitted.</p> <p>In terms of specialist occupiers, whilst Reigate &amp; Banstead are able to control the uses of properties (i.e. shop, restaurant etc), we are unable to control which occupiers occupy the premises through the planning process.</p> <p>The proposed policies do seek to be more flexible than the previous Local Plan, for example, by being applied to the town centre as a whole rather than sub-frontage and by allowing units that have been empty for certain amount of time to change use.</p> <p>For Redhill and Horley -where the Retail Needs Assessment identified the food and drink provision within the town centres to be poor- changes of use will be permitted, even where this would lead to the A1 threshold falling below the prescribed level, providing that there is no overconcentration of such uses.</p> <p>For units which have Amazon pick-up facilities, planning permission is required for the main planning use.</p>	<p>No changes.</p>
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<p><b>RET 2</b> - We support this policy but suggest a change to 1)b i– namely add at the end ‘in order to retain the vitality and viability of the centre’.</p>	<p>Noted. 1bi): it is not felt that there is a need to specifically add these words to this part of the policy - the essence of the whole policy is to ensure the viability and vitality.</p>	<p>Marketing requirements updated</p>
<p><b>RET 3</b> - We suggest in paragraph 2) that use class A4 should also be included.</p>	<p>This comment has been noted. In light of this comment and others, it is proposed that A4 uses are included as appropriate uses.</p>	<p>Amend RET3 to include A4.</p>
<p><b>RET 3</b> -We suggest that 2b) makes reference after ‘for a shop and/ or community use’ to ‘at a reasonable market rent’.</p>	<p>marketing requirements (moved into a separate annex) have been updated to be more robust, including requirement for details on prices</p>	<p>Marketing requirements updated</p>
<p><b>RET 4</b> - suggest the same insert on marketing be also added to this policy as well as RET2 and 3.</p>	<p>Noted. Marketing requirements have been updated to be more robust and requirement to accord with these requirement inserted into RET2, RET3 and RET4</p>	<p>Marketing requirements updated</p>
<p><b>RET 5</b> - Additional rules don't protect. Small scale will survive if given flexibility. Perhaps consider short term planning say 5 years when units empty.</p>	<p>This comment has been noted. Proposed policy RET3 seeks to allow greater flexibility for allowing changes of use between A1-A3 and D1/D2 in local centres. Given this, and the greater flexibilities afforded by the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), the policy is not considered necessary.</p>	<p>No changes.</p>

<p><b>RET 6</b> - Would prefer 3b) to be reduced in local centres.</p>	<p>This comment has been noted. As stated in the Development Management Plan Town Centre Evidence Paper, the size of retail units within existing local centres and the potential impact upon local centres was taken into consideration when determining the retail impact assessment thresholds.</p> <p>Due to the smaller size of units within the local centres, and the importance of local centres to the Borough, the thresholds were introduced at a lower rate than if consideration had only been given to the town centre units. It was felt that a small basket convenience store (typically of 250sqm) could impact local centres and therefore the threshold was set at 250sqm. Full explanation is detailed in the Town Centre DMP Evidence Paper.</p>	<p>No changes.</p>
<p><b>RET1</b> - DMP underplays the role that residential development can deliver in ensuring the vitality of centres which is recognised at paragraph 23 of the Framework. RET1 should recognise that residential development in a secondary frontage can provide an active ground floor. In accordance with paragraph 23 we consider that policies should encourage residential development on appropriate sites to contribute to the vitality of the town centre.</p>	<p>This comment has been noted. The Development Management Plan RET1(2) recognises the role of residential within town centres at upper floors, for example increasing natural surveillance. However, in order to ensure vibrant town centres, there is a need for active ground floors. It is not felt that residential uses on the ground floor can provide active frontages. If an applicant could demonstrate active ground floor frontages with residential then it would be permitted.</p>	<p>No change.</p>
<p><b>RET1:</b> The phrase in 1d, “not have an unacceptable impact”, is very weak. Even if a proposal was refused on these grounds, the subjectivity of the criterion would leave</p>	<p>This comment has been noted. The term 'unacceptable' is consistent with terminology used in national policy and used by the County Council and other LPAs. It acknowledges that schemes may have an impact, but allows for these where the</p>	<p>No changes.</p>

<p>us open to challenge. Replace with "not have a detrimental impact".</p>	<p>impacts are acceptable overall or can be mitigated by travel plans etc.</p>	
<p><b>RET1-7</b> will need constant re-evaluation as local shopping needs change. Under re-generated town centres like Horley should get a focused re-generation programme and the retail needs revised in line with this.</p>	<p>This comment has been noted. These policies have been prepared to meet the retail needs over the plan period. However, Reigate &amp; Banstead monitor town and local centre uses on a regular basis and produce town centre and local centre monitors annually which monitor progress towards policies.</p> <p>This process will highlight where initiatives are needed in order to help meet these targets or where they may in the future need amending. Horley and Redhill town centres have dedicated regeneration strategies.</p>	<p>No changes.</p>
<p><b>RET2</b> - Concept of A1 thresholds sensible, not clear what sets the value. Aspirations for alternative sub-threshold uses welcome. Is there an A1 level that would be intolerably low? The matter would have to be left to the discretion of the borough.</p>	<p>Comment has been noted. Factors such as actual A1 rate; vacant units; vacancy patterns over time; planned and proposed changes to the town centres; the findings from the Retail Needs Assessment; and changes to retail habits were used to propose retail frontage thresholds. More detail is provided in the Town Centre Development Management Plan Evidence paper.</p> <p>The 2005 Borough Local Plan introduced sub-threshold values, it is felt that this is overly restrictive, for example it does not take into account that different frontages may be more suited to different uses.</p> <p>It is considered that the criteria in RET2: 1(b), which allow the proportion to fall below the A1 frontage threshold, will stop the level of A1 getting unacceptably low.</p>	<p>No changes.</p>



<p><b>RET2</b> - do not agree with the proposed threshold changes identified in Policy RET2. The latest Council Town Centre Shopping Frontages Monitor identifies that Reigate performs well against the existing targets and offers a good degree of comparison shopping and offers the greatest percentage of food &amp; drink leisure units in the Borough. Therefore, why lower the A1% threshold when it is not far from being achieved. When looking at the thresholds the policy is seeking to reduce A1 units in Reigate Town Centre down from 80% to 70% in Primary areas and 66% to 55% in Secondary Areas.</p> <p>The 2016 Town Centre Monitor showed that Reigate actually has 73% A1 in the Primary Shopping Frontages and 57% A1 in the Secondary Shopping Frontages (See copy of the Town Centre Monitor attached). Therefore, it is debatable whether the figures should be lowered any further. Why not seek to achieve the higher percentage and improve the retail offer in the Town Centre rather than increase the number of non-A1 uses?</p>	<p>Noted. Full justification of reducing the A1% retail threshold for Reigate town centre is detailed within the Town Centre DMP Evidence Paper. The existing A1 retail thresholds for all town centres are not felt to be flexible enough to permit uses which could contribute to the vitality and vibrancy of the town centres. The existing Borough Local Plan was written at a time when retail was the primary function/ use of town centres. Whilst the clustering of retail uses can contribute significantly to the vitality and viability of the town centres, the distinction between shopping and leisure has become increasingly blurred and there is an increased focus on providing a night-time economy. A suitable balance therefore needs to be established in policy to retain a retail core and allow flexibility for changes of use which would contribute to the vitality of the town centres. Specifically for Reigate town centre, the A1 occupancy rate has fallen below the 80% threshold and now accounts for 73%. It is felt that lowering the threshold to 70% will allow for some (small) changes of use which will improve the offer within the town centre whilst not diluting the retail core. This reflects the findings of the Retail Needs Assessment.</p>	<p>No changes.</p>
<p><b>RET2</b> - 1(b)ii - should be amended to state that the property must be marketed at an appropriate price for the use.</p>	<p>Marketing requirements have been updated to be more robust (including requiring details on advertised rent/price which should be reasonable) and requirement to accord with these requirement inserted into RET2, RET3 and RET4</p>	<p>No changes.</p>

<p><b>RET2</b> - In the case of secondary frontages, sub section c, uses in D1 would be excluded but some within this class could be attractive and potentially useful. Why should the following uses not be preferred too, art galleries, local museums, libraries, exhibition space and facilities for education and training?</p>	<p>It is proposed that the policy is amended to include D1 uses.</p>	<p>Include D1 uses.</p>
<p><b>RET2</b> - Minimum thresholds for A1 frontages are counterproductive and inhibit the evolution of our town centres. For example, in Redhill, they have directly prevented the growth of A3 uses (and hence an “evening economy”). The concession in 1(b)i for Redhill and Horley is welcome, but still unclear (e.g. how is “vicinity” defined?) Reduce the thresholds to (say) 50% in primary and 25% in secondary frontages (assuming that outright removal would be a step too far at this stage).</p>	<p>This comment has been noted. The proposed A1 frontage thresholds within the DMP are intended to reflect changing retail habits. It is felt that an A1 rate is needed to ensure that a retail core is retained within the town centres.</p> <p>A number of factors including the actual A1 rate; vacant units and vacancy patterns over time; planned and proposed changes to the town centres; and findings from the Retail Needs Assessment were taken into account when setting the proposed targets, it is felt that they are at appropriate levels to retain a retail core and allow for some flexibility.</p> <p>With regards to A3, an explanation of 'overconcentration of such uses in the vicinity' is detailed on page 29, namely creating (or further extending) a continuous frontage of two or more non-A1 units.</p> <p>The policy also allows for the proportion of A1 frontage to fall below the threshold if the unit has remained vacant for a certain period of time and it has been marketed appropriately.</p>	<p>No change.</p>

<p><b>RET2</b> - Retailing is changing (i.e. sales over the internet growing) but no change in the percentage of A1 reqd on main shopping fronts over the last 30 years. A3 can bring vitality and employment to the town. A large no's of charity shops destroys that vitality.</p>	<p>This comment is noted. It is recognised that the retail frontage thresholds in the 2005 Borough Local Plan were set at a time when retail was the primary is of town centres. There has since been a significant growth in internet retailing and the distinction between shopping and leisure has become increasingly blurred. There has also been an increased focus on providing a night-time economy. Proposed policy RET2 seek to reduce retail thresholds., For Redhill and Horley, where the Retail Needs Assessment identified limited/ poor provision of A3, it is proposed that changes of use to A3 will be granted - even where this would lead to A1 retail falling below the prescribed level - providing no overconcentration of such uses. However, whilst Reigate &amp; Banstead Borough Council are able to control the use of premises, (for example restaurant, office etc) we are unable to control occupiers - whether local or national brands.</p>	<p>No changes.</p>
<p><b>RET2 and RET3</b> - We consider that the proposed policy thresholds and tests are typical, however that the threshold test for the provision of non A1 Class uses is based upon a percentage across the total identified frontages - approach is too basic. Suggest that the threshold percentage tests are based upon sub frontages along defined streets (or collections of streets) rather than across the total identified frontage.</p>	<p>Noted. The 2005 Borough Local Plan currently monitors sub frontages. As outlined in the Development Management Plan Town Centre Evidence Paper, it is felt that this approach is too restrictive. For example if the town centres retail frontage was above the required threshold, but a unit became available in a sub-frontage that was below and a restaurant/ service expressed an interest then this change of use would not be allowed, this may lead to the loss of a key restaurant/ service which would benefit the town centre because of overly restrictive policies. It also does not reflect the fact that different units may suit different frontages (for example due to bigger units).</p>	<p>No changes.</p>
<p><b>RET2</b> - Suggest that Part 1,b, i of the policy is altered to include the provision of Class A2 uses in addition to Class A3 uses.</p>	<p>The General Permitted Development Order 2015 allows for permitted changes of use between A1 and A2. It is therefore felt that the proposed policy wording is appropriate.</p>	<p>No changes.</p>

RET2:2(c) - D1 uses should also be considered favourably, as they are appropriate to town centres.	This comment has been noted and taken into consideration.	Include D1 uses.
<b>RET3</b> - Suggest that this should also include Brighton Road, just south of Redhill town centre, which has retail frontage stretching south from the Garland pub, and then opposite the junction with Brook Road and also around the junction of Brighton Road with Hooley Lane/Garlands Road, including at the south-east end of Garlands Road.	This comment has been noted. Brighton Road, Redhill has been assessed as a local centre.	Designate Brighton Road, Redhill as a local centre.
<b>RET3</b> - Do not understand why the policies say that local centres will only be protected 'where possible'.	This comment has been noted. The local centre policies seek to retain retail and community uses 'where possible' as this recognises that in some cases these uses may no longer be viable. Where alternative uses are proposed, marketing evidence must be provided that the unit is vacant and has been marketed for at least six months, it has been advertised and an appropriate rent/ sale price is being asked.	No changes.

<p><b>RET3</b> – suggest two identified local centres should be adjusted. We note that the National Planning Policy Framework refers to town centres and primary shopping areas, whereas the Core Strategy refers to Town and local centres. We are surprised therefore that, whereas the Drift Bridge area includes to the north the Drift Bridge apartments and the Audi car sales and repair site, Burgh Heath does not mention the ASDA supermarket, a large site which may soon include a petrol station and probably caters for more customers than any retail business in the Borough. We suggest that ASDA is a primary shopping area and the Drift Bridge should be modified.</p>	<p>This comment has been noted. Burgh Heath: the Asda supermarket is some significant distance away from the main shopping parade and therefore it is not felt that the boundary should be extended to include the supermarket. In order for an area to be designated as a local centre, it must have 6 or more units, the majority of which should be A1. The Asda supermarket is a stand alone store and therefore cannot be designated as a local centre. Drift Bridge: it is proposed that the boundary is amended to remove the former Drift Bridge hotel and garage.</p>	<p>No changes.</p>
<p><b>RET3</b> - In small shopping parades we are constantly losing shops to residential as it is easy to show it would not let without the owner, developer having to do much work.</p>	<p>Marketing requirements have been updated to be more robust</p>	<p>Marketing requirements updated</p>
<p><b>RET3</b> - Not included are the local centres on Horley Row and Meath Green Lane/Lee Street; community shops at Court Lodge/Horley Gardens Estate; Riverside; the Air Balloon; local shops and; soon, the Acres.</p>	<p>This comment has been noted. These areas have been assessed against the criteria outlined in the Local Centre Development Management Plan evidence document, it is proposed that Horley Row is designated as a local centre.</p>	<p>Designate Horley Row as a local centre.</p>

<p><b>RET3</b> - question the need to create the new Holmesdale Local Centre as proposed in Policy RET3. At present this falls within the Reigate Town Centre boundary on the Local Plan Proposals Map and would be segregated from the Town further by the change proposed. The area identified is one of the main gateways into the Town Centre and doesn't need to be identified separately from the Town Centre. There is no reason why the Secondary Shopping Frontage Policy couldn't exist in this location given the recent arrival of the Co-Op.</p>	<p>Comment has been noted. Whilst it is recognised that the area forms one of the main gateways into the town centre, it is some considerable distance away from the main retail area. A local centre designation is therefore felt more appropriate.</p>	<p>No changes.</p>
<p><b>RET3</b> - With regard to Burgh Heath the consolidation within a clear boundary is very welcome and addresses local concerns about spreading onto unsuitable sites. There is a risk that the inclusion in the local centre of the yard at the A217 frontage of Rose Cottage would be detrimental to the wooded appearance that we seek to preserve in the A217/A240 sector of Burgh Heath.</p>	<p>This comment has been noted. It is felt that the yard should be included within the local centre boundary - the boundary has however been drawn tight to yard to prevent further expansion onto the wooded area.</p>	<p>No changes are proposed.</p>
<p><b>RET4</b> - "It can be clearly demonstrated....etc." In my opinion this needs to be tighter. It is very easy to demonstrate that a property has been advertised but with no suitable response.</p>	<p>This comment has been noted. Marketing evidence requirements have been amended to reflect this comment and others.</p>	<p>Amended marketing requirements.</p>

<p><b>RET4</b> - not considered necessary as it is unlikely that these need to be retained in most circumstances as adequate protection for community retail provision is afforded by the Local Centre designations proposed.</p>	<p>This comment has been noted. Proposed policy RET4 seeks to afford protection to other retail units which do not fulfil the characteristics of a local centre (for example do not have 6 units) but are equally important to the community.</p>	<p>No changes are proposed.</p>
<p><b>RET4</b> - This could also recognise the value of retaining single, stand-alone shops, which provide a significant benefit, even when they are the only retail premises in an area. For example the single or last remaining shop in an area should be afforded protection by this policy. Therefore an addition d) should be included, to strengthen the protection of the last (lone) shops in residential areas.</p>	<p>This comment has been noted. RET4 is felt to provide sufficient protection to single, stand-alone shops whilst recognising that in some cases - when the property is vacant and has been marketed for at least 6 months and evidence can be provided of unsuccessful marketing - that the unit may no longer be viable.</p>	<p>No changes.</p>
<p><b>RET4:</b> it says “WILL be permitted” This needs to be changed to “may be permitted. This gives our planners some “wriggle” room.</p>	<p>Wording has been updated to read "proposals resulting in the loss of retail uses will be permitted <u>(subject to compliance with other policies)</u> where:</p>	<p>Updated wording to ensure compliance with other policies</p>
<p><b>RET5</b> - 6 months not long enough. Fitting out a shop for another use is expensive. We don't want a plastic finish. 5 years needed after 6 months empty</p>	<p>This comment has been noted. The proposed policy has been removed as it is considered the Town and Country Planning (General Permitted Development) (England) Order 2015 Schedule 2 Part 4 Class D which says that buildings of A1-A5, B1, D1/2 use and less than 150sqm are able to change use temporarily for a period of up to 2 years to A1-A3 and B1 covers this.</p>	<p>Policy removed</p>

<p><b>RET5</b> approach provides for temporary uses within town centres and local centres for up to 6 months. It is questionable whether or not this period is long enough for the temporary use to be viable. It is considered a consistent approach should be taken with the temporary period being for 2 years. The policy should also clearly state how any previous temporary use under the terms of the GPDO relate to the application of this policy and the potential for repeat temporary uses.</p>	<p>This comment has been noted. The proposed policy has been removed as it is considered the Town and Country Planning (General Permitted Development) (England) Order 2015 Schedule 2 Part 4 Class D which says that buildings of A1-A5, B1, D1/2 use and less than 150sqm are able to change use temporarily for a period of up to 2 years to A1-A3 and B1 covers this.</p>	<p>Policy removed</p>
<p><b>RET6</b> - Text of this policy needs to make clear that policies RET1 and RET2 need to be complied with.</p>	<p>(RET6 now RET5) This comment has been noted, however, it is not felt that there is a need to specifically reference policies RET1 and RET2, these must be complied as a matter of course.</p>	<p>No changes.</p>
<p><b>RET6</b> - we are unclear what the 'other retail uses' comprise and therefore what their impact will be. The wording needs to be clarified.</p>	<p>(RET6 now RET5) It is recognised that 'other retail uses' is unclear, in light of this comment and others, it is proposed that the wording is amended to make it clear that RET6: 2c(i) covers any other retail not covered under comparison and convenience.</p>	<p>wording is amended to make it clear that RET6: 2c(i) covers any other retail not covered under comparison and convenience.</p>



<p><b>RET6</b> - Would a development escape the rule if it contained a number of sub threshold units that had been added incrementally and individually approved without the need for an impact assessment e.g. a rural development comprising individual trading units as in Denbies at Dorking?</p>	<p>(RET6 now RET5) This comment has been noted. No a development would not escape the rule if it contained a number of sub threshold units that had been added incrementally and individually approved without the need for an impact assessment. Proposals for extensions and new units within designated Retail Warehousing Areas will be required to submit a retail impact assessment to ensure that development does not detract from or have a negative impact on the vitality and viability of existing town centres.</p>	<p>No changes.</p>
<p><b>RET6 / 7</b> In GALs view R&amp;B BC need to specifically look outwards at other competing retail centres and work to establish not only advantages within their own centres but also to develop positive linkages with other performing retail centres. GAL believes that his should e further considered within the proposed policies RET6 and RET7</p>	<p>This comment has been noted. Proposed policy RET6 seek to ensure that retail and town centre uses are retained within the town centres and where uses are proposed outside of the designated areas that they would not have a harmful impact upon the town and local centres.</p> <p>Proposed policy RET7 does not propose any additional retail warehouse areas, but rather says that retail warehouse uses should only be permitted within designated areas or any other sites specifically allocated for retail warehousing.</p> <p>Retail impact assessments are however still required for uses within these areas to ensure that the proposed uses would not impact upon the town centres. In terms of working with other authorities, this comment has been noted, however, it is difficult given that we are all at different stages of the Local Plan process. We have a Duty to Cooperate with neighbouring authorities and therefore consult, and are consulted on, regarding retail centres.</p>	<p>No changes are proposed.</p>

<p><b>RET6</b> sets a threshold for retail impact assessments of 150m2 and 250m2 respectively. These are not considered necessary and to be significantly below the threshold within the NPPF of 2,500m2 at paragraph 26. If a lower threshold is required this should be justified by robust evidence. The NPPF is clear that the threshold should be proportionate.</p>	<p>(RET6 now RET5) The comment has been noted. The Retail Needs Assessment identified the need for a lower retail impact assessment threshold than the 2,500sqm National Planning Policy Framework defined threshold. The Development Management Plan Town Centre Evidence Paper details the rationale for 150sqm convenience and 250sqm comparison thresholds. It looks at the average size of the existing comparison and convenience retail units, retailer formats, planning permissions and vacancy targets.</p>	<p>No changes.</p>
<p><b>RET6:</b> Town and Local Centres should acknowledge that paragraph 25 of the NPPF states that the "...sequential approach should not be applied to applications for small scale rural offices and other small scale rural development."</p>	<p>(RET6 now RET5) This comment has been noted. "The need for a sequential approach does not apply to applications for small scale rural offices or other small scale rural development" has been added to the policy for clarity</p>	<p>Update RET5:2 (a) with "The need for a sequential approach does not apply to applications for small scale rural offices or other small scale rural development"</p>

<p><b>RET7 - 2d)</b> We suggest that there should be a cross reference to EMP 4 where the proposed retail warehouse site is in a designated employment area, otherwise we support this policy.</p>	<p>(RET7 now RET6)This comment has been noted.EMP4 seeks to ensure the safeguarding of employment land. RET7 (now RET6) seeks to ensure that proposals for retail warehouse areas are only permitted within designated retail warehouse areas. Whilst there may be proposals for retail warehouses within designated employment areas, RET7 says that this would not be an appropriate location as the employment areas are not designated as retail warehouses. It is therefore felt that there is no need to cross-reference the policies.</p> <p>Reigate &amp; Banstead Borough Council are not proposing any additional retail warehouse areas. Proposals for retail warehousing will not be permitted unless the proposal falls within a designated Retail Warehouse area or any other sites specifically allocated for retail warehousing. There is therefore no need for cross reference to employment areas (policy EMP4).</p>	<p>No changes.</p>
<p><b>RET7 -</b> It is noted that there is not a warehousing site in Area 1.</p>	<p>(RET7 now RET6) This comment has been noted. The Retail Needs Assessment did not identify the need to provide a retail warehouse area within the north of the borough. The need to identify a suitable retail warehouse area within the north of the Borough was therefore not explored.</p>	<p>No changes.</p>
<p><b>RET7 -</b> warehousing along Brighton Road: The evidence paper seems remarkably weak. There are already DIY warehouses at Reigate and Dorking, and far larger furniture warehouses at Croydon and Crawley. What specific niche will Redhill occupy?</p>	<p>(RET7 now RET6) This comment has been noted. Reigate &amp; Banstead Borough Council are not proposing any additional retail warehouse areas but are protecting existing ones which are well established. Proposed policy RET7 (now RET6) seeks to ensure that additional retail warehousing is provided within the designated retail warehouse areas or any other sites specifically allocated for retail warehousing.</p>	<p>No changes are proposed.</p>

**RET7** identifies areas that are designated for retail warehousing, though it is not clear if these represent formal retail centres that would form part of the RBBC retail hierarchy. If these locations are identified as formal retail centres, there is a risk that this would afford them equal status in sequential test terms to the identified town centres. It would provide clarity if the policy could confirm the status of the identified retail warehouse designations to make clear whether they represent formal retail centres. To ensure the continued vitality and viability of existing town centres, the policy could reiterate that the requirements of the NPPF sequential and impact tests will need to be satisfied where retail warehousing is proposed in these locations, possibly by cross-referring to Proposed Policy RET6.

(RET7 now RET6) Comment has been noted. The Retail Warehouse Development Management Plan Evidence Paper clarifies that the areas identified as Retail Warehouse areas have been assessed as sequentially preferable for bulky type goods (and would be restricted to providing these types of goods) and as such a sequential within a Retail Warehouse area is not required. This is summarised in the following text taken from the evidence paper:

"3.16 Based on an analysis of local appeals, and evidence in the Retail Needs Assessment, the policy should reflect the principle that retail warehouse areas should be restricted to uses/goods which are complementary to, and not normally found – or capable of being reasonably accommodated – within, town centres. The two defining factors are therefore:

- Bulk, size, weight, quantity of goods and the need to customers to be car-borne as a result
- Whether, due to the nature of the product, it requires a specific form of display/sale that cannot reasonably be accommodated in a town centre retail environment

3.17 Acceptable uses should therefore typically occupy a single floor, cater for car-borne customers and sell bulky and household goods (such as DIY, home and garden improvement products, hardware, self-assembly and pre-assembled furniture, floor coverings, electrical goods, motor accessories and parts, office supplies, bicycles and motor vehicles, pets and pet-related products)"

Retail ware houses are classified as edge-of-centre/ out-of-centre sites, the wording in the reasons section will be amended to reflect this.

The policy has been amended to read make it clear that a sequential test will be required where the site does not fall within a designated retail warehouse or any other allocated site for retail warehousing.

Also now states:  
 2) Proposals for retail warehousing will be required to provide a retail impact assessment, in line with Policy RET5  
 3) A retail impact assessment must show that the proposed development would have no harmful impact on the existing town and local centres and planned investment within the town and local centres.

	<p>Proposals in the Retail warehouse areas will still need to provide a retail impact assessment and this has been clarified in the policy. For retail warehousing uses outside of these designation areas a sequential test would be required as well as a retail impact assessment. The policy will be amended to make this clear.</p>	<p>The reasons section has also been expanded to make clear that retail warehouses are classified as edge-of-centre/ out-of-centre sites and what the acceptable uses are</p>
<p><b>Retail Needs Assessment</b> - As the Retail Needs Assessment of 2016 considerably reduces the additional retail floor space likely to be required in the plan period, we are surprised that there have not been reductions to the targets set out in the Core Strategy. In particular, the evidence shows there is no quantitative need for more convenience space based on the Needs Assessment Update in 2016 and neither is there a need for extra retail warehousing. There is therefore no need to allocate sites for it. The lack of take up on sites in Redhill for example suggests over optimism at a time of changing shopping habits, particularly with the trend to on-line shopping. The reason for our concern is that there will be more vacant shops with a loss of vitality if too much new floorspace is proposed, so it is important to assess demand before any permissions for large increases in the number of units.</p>	<p>This comment has been noted. It is intended that the revised Retail Needs Assessment floorspace needs will be carried forward rather than the higher figures outlined in the Core Strategy. The findings of the Retail Needs Assessment better reflect current economic and market circumstances and shopping trends (such as online shopping). No additional convenience floorspace nor retail warehousing is proposed in the Development Management Plan. Reigate &amp; Banstead Borough Council monitor town and local centre uses including vacant floorspace on a quarterly basis.</p> <p>A number of factors including the actual A1 rate; vacant units and vacancy patterns over time; planned and proposed changes to the town centres; and findings from the Retail Needs Assessment were taken into account when setting the proposed targets, it is felt that they are at appropriate levels to retain a retail core and allow for some flexibility.</p> <p>Proposed policies RET1, RET2 and RET3 seek to ensure town and local centres are vibrant and that there is flexibility to adapt to future changes.</p>	<p>No changes.</p>

<p><b>Retail Needs Assessment</b> - We also consider that it is inappropriate to propose more comparison floor space for Banstead, although the slight reduction on the Core Strategy target is welcomed. People tend to go to Epsom, Sutton, Kingston or Croydon for comparison shopping, or shop online. The reason for our concern is that will be more vacant shops and a loss of vitality if too much new floorspace is proposed.</p>	<p>This comment is noted. The Retail Needs Assessment identified a need for about 900 sqm over the course of the plan period. This is planned to be delivered through improved performance and minor extensions, rather than a significant comparison-led development. It is not intended to increase comparison floorspace so that Banstead can compete with areas such as Kingston, but rather to improve the existing offer.</p> <p>The adopted Core Strategy retail hierarchy defines Banstead as a convenience-oriented centre. In proposing the retail policies, consideration has been given to the role of each of the individual town centres. For example, it is not proposed to allow changes of use to A3 where it would lead to a fall below the identified retail frontage threshold, as the Retail Needs Assessment identified a good representation of food and drink operators within Banstead.</p> <p>Proposed policy TAP1 seeks to ensure that new developments deliver adequate parking provision. Parking standards are outlined in Annex 2.</p>	<p>No changes.</p>
<p><b>Retail Needs Assessment</b> - It is recognised that the agreed CS included 2,500m<sup>2</sup> of additional shopping space in Banstead, it is not accepted this level of retail development was or is appropriate nor was not properly assessed during the development of the Core Strategy. The scale of retail development would have caused significant harm to the village amenity and vitality. The DMP reduces this retail development to 1,300m<sup>2</sup>.</p>	<p>This comment has been noted. The Retail Needs Assessment 2016 revised the retail floorspace need for Banstead to 900 sqm of comparison floorspace over the plan period. This revised figure reflects current economic and market circumstances and shopping trends (such as online shopping).</p>	<p>No changes.</p>

<p><b>Retail Needs Assessment</b> - The data used to justify the figure of 1,300 sqm of comparison floorspace in Banstead is from 2007, and is therefore nine years out-of-date. Over that time, there have been tremendous changes in shopping habits, with far more shopping being done on the internet, and this needs to be reflected in the figures.</p>	<p>Noted. The reference to 1,300 sqm in the DMP was to set out the context however a revised 2016 Retail Needs Assessment refreshed the comparison floorspace need for Banstead.</p> <p>The Retail Needs Assessment 2016 identified the need for approximately 1100sqm of comparison floorspace by 2027. It is intended for these floorspace projections will be carried forward as they better represent changing retail trends.</p>	<p>No changes.</p>
<p><b>Retail Needs Assessment</b> - We consider that the total amount of retail area proposed seems to be at odds with the 800sq m proposed in the DMP. We feel the figure in the Plan should be based on the Retail Needs Assessment. We also have concerns about the potential loss of the architectural heritage of Banstead.</p>	<p>This comment is noted. The reference to 1,300 sqm in the DMP was to set out the context however a revised 2016 Retail Needs Assessment refreshed the comparison floorspace need for Banstead.</p> <p>The Retail Needs Assessment 2016 identified the need for approximately 1100sqm of comparison floorspace by 2027. It is intended for these floorspace projections will be carried forward as they better represent changing retail trends.</p> <p>In terms of the potential loss of architectural heritage, proposed policy DES1 seeks to ensure that new developments are of a high quality, promote and reinforce local distinctiveness, and reflect the local character of the area, NHE7 covers heritage assets, and DES12 covers shop front design</p>	<p>No changes.</p>

<p>Status of frontages not in town centres nor local centres, e.g. Brighton Road, Redhill What policy covers these areas? Brighton Road was originally within the town centre area for Redhill, hence was not a Local Centre, but has now been removed from the Town Centre (and is still not a Local Centre). Clarify the treatment of this and any other such parades of shops, which are neither in Town Centres nor Local Centres.</p>	<p>This comment has been noted. Brighton Road, Redhill has now been assessed and is proposed as a local centre.</p>	<p>Designate Brighton Road, Redhill as a local centre.</p>
<p><b>Tadworth</b> - I would like to see a more diverse high street, for shopping with nice hanging plants and a welcoming feel.</p> <p>More and better parking, not so expensive. Less red routes in smaller shopping areas</p> <p>In Tattenham Corner the parking near shops needs to be improved as more eating places have sprung up. Banstead is hell to get parked in</p>	<p>Comments regarding parking charges/issues, hanging baskets, existing parking and red routes are noted, however, they are not issues which can be dealt with through the Development Management Plan.</p> <p>Whilst Reigate &amp; Banstead Borough Council are able to control the use of premises, (for example restaurant, office etc) we are unable to control occupiers - whether local or national brands.</p> <p>For new development, Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No changes.</p>



<p><b>Tadworth</b> - the High Street shopping centre should be added to the local centre designation, despite the fact that it is not physically linked to the current town centre area.</p>	<p>This comment has been noted. Due to its separation from existing local and town centre designations, it is proposed that High Street, Tadworth is evaluated as a potential local centre.</p>	<p>Designate High Street, Tadworth as a local centre</p>
<p>The wording of relevant policies / supporting text should acknowledge that the function and role of town centres and shopping areas has changed and will continue to do. As such they need to provide for a variety of uses, including much needed residential accommodation to support existing services and encourage diversification into new service industries. Policy should therefore support a mix use approach to development. We suggest at that the percentages provided in policies <b>RET2 and 3</b> are unhelpful in this regard. We would also question the inclusion of C3 uses on the upper levels of shops within town centre shopping areas. We do not believe that encouraging this would be acceptable given that the parking provisions within 'Annexe 4' of the DMP document requires one space for each new flat even within areas of high accessibility which would be most applicable to town centres. This would lead to a conflict with the need to keep the highway safe for pedestrians. We suggest that the Council reconsiders the level of parking provision</p>	<p>This comment has been noted. As outlined in the Development Management Plan, it is recognised that the function and role of the town centres and shopping areas and retail in general has changed, for example there has been an increased blurring of retail and leisure. It is recognised that the existing retail frontage policies are too restrictive and therefore there is a need to amend these, for example through applying the retail frontage thresholds to the whole primary/ secondary frontage rather than the sub-frontages. It is however felt that there is a need to retain an A1 frontage threshold in order to ensure a retail core is retained within the town centres. Revised retail frontage thresholds are proposed taking into account the actual A1 rate; vacant units and vacancy patterns over time; planned and proposed changes to the town centres; and findings from the Retail Needs Assessment. It is felt that residential uses are appropriate uses on upper floors as this creates for example natural surveillance and improves safety.</p> <p>Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these</p>	<p>No changes are proposed.</p>

<p>for units located within high accessibility areas if there is a strong desire for the use of upper floor units of shops to support flats.</p>	<p>car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets</p>	
<p><b>Tadworth</b> town centre should be defined as the shops on Cross Road and the parades on Shelveys Way and where the fishmonger and baker are located nearer the Heath.</p> <p>In addition, the evidence base for Tadworth is completely flawed. For instance, there is no village parking except outside the shops and The Church of The Good Shepherd. Many roads have become commuter or office carparks. Parking time limits on most roads expire before Council enforcement officers visit and there is inadequate enforcement by the Council. The road between Costcutter and Tadworth Tyres/ Farm Fencing is often down to one lane with the complication of the mini roundabout at the bottom and the turning into the Preston estate, the petrol garage and Shelveys Hill Garage. No mention of the double decker buses and school buses that use the latter and the village and the dangers of crossing the various roads. There is no pedestrian crossing, simply pedestrian crossing lights at the crossroads on the bridge but not</p>	<p>Given this and other comments, it is proposed to assess High Street, Tadworth as a local centre. More information can be found in the The Local Centre review.</p> <p>Comments regarding parking have been noted, however, these are issues which cannot be dealt with through the Development Management Plan. Proposed policy TAP1 seeks to ensure new developments provide adequate parking and parking standards are outlined in Annex 4.</p>	<p>Propose High Street, Tadworth as a local centre.</p>

<p>near the various shops. There is a zone 6 train station which draws many commuters from out of area and two primary/preparatory schools and a nursery in the village and two large churches in the same road. Tadworth is a commuter rat run between the A217 and Epsom and Walton (Pfizer's head office). We would ask the Council to amend the report to reflect the facts.</p>		
<p><b>Retail boundaries</b> - Banstead, Tadworth and Walton which are still villages (albeit expanded ones) we can see no justification for expanding the “town” or retail boundaries and request the Council to justify any changes and, if not, to revert to the previous position.</p>	<p>This comment has been noted. Full justification for the changes to the boundaries are outlined in the Town Centre and Local Centre Development Management Plan Evidence Papers.</p> <p>Banstead: Banstead town centre previously had no identified town centre boundary. A boundary is proposed which takes into account all town centre uses (retail, leisure, community, offices). The town centre boundaries are not drawn to indicate that retail can be built anywhere within the town centre, but rather reflects all of the town centre uses.</p> <p>Walton: it is proposed to extend the local centre boundary to include the retail units to the east of the existing boundary.</p> <p>Tadworth: local centre uses include retail, restaurants and community facilities. It is therefore proposed to extend the boundary to include the Church and day nursery.</p>	<p>No changes.</p>

<p><b>Woodhatch</b> - Woodhatch shops vital for local communities. seems already to be doing better than previously. The car parking facilities in this area are always close to FULL. Where will these extra cars that come with extra housing park to use these facilities? They wont be able to, so they wont use them</p>	<p>This comment has been noted. Proposed policies RET3 and RET6 seek to ensure the vitality of the local centres such as Woodhatch.</p> <p>Reigate &amp; Banstead Borough Council are not proposing any changes to the Woodhatch local centre. The proposed Sustainable Urban Extensions to the south of Reigate are within walking distance of the Woodhatch local centre. The Woodhatch local centre has good provision for parking.</p>	<p>No changes.</p>
<p><b>High rents</b> - It seems to me that rental costs for commercial properties is the main issue otherwise we would not have so many charity shops and vacant units in Redhill and elsewhere</p>	<p>Comment is noted - This is not something that the DMP can control</p>	<p>No changes.</p>

**THEME 2**

DESIGN		
<p><b>DES1</b> - Suggest adding an additional criterion:- Between d) and e): Proposals that would cumulatively result in harm to the amenity of occupants of existing nearby buildings as described in d) will be resisted. Back garden development should seek to protect the amenity of neighbouring properties and not result in a cumulative degradation of that amenity.</p>	<p>DES1 (5) covers these impacts stating development must provide "an appropriate environment for future occupants whilst not adversely impacting on the amenity of occupants of existing nearby buildings, including by way of: overbearing, obtrusiveness, overshadowing, overlooking and loss of privacy</p> <p>For pollution and environmental aspects of amenity, national and proposed policies cover impacts cumulatively.</p>	<p>No change</p>
<p><b>DES1</b> - "WILL" be granted - gives us no wriggle room, it should be something like 'there will be a presumption to grant planning permission'</p>	<p>Wording updated as follows: "Planning permission will be granted for new development where it meets the following criteria (subject to compliance with other policies"</p>	<p>Wording updated as follows: "Planning permission will be granted for new development where it meets the following criteria (subject to compliance with other policies"</p>
<p><b>DES1</b> Policies should not require that new development slavishly follows the layout and design, plot sizes, densities etc. of existing development. Whilst new development should complement and protect the character of existing areas it need not replicate</p> <p>it.is considered to be unduly restrictive in</p>	<p>Overall plot size can still be an important element of local character, but it is agreed that the visible dimensions of the plot are probably a bigger determinant of the immediate interpretation of character. the DMP should not aim to unnecessarily restrict higher density development, but must at the same time take into account the existing character of the borough. The policy has been amended in light of</p>	<p>Wording of the DES1 has been amended in light of this and other comments</p> <p>Following wording added to the reasons section: "Innovation and originality in design will be supported where appropriate visual</p>

parts. Part c) requires development to respond to the character of the area which is appropriate. However in addition it requires development to respect the “prevailing pattern of plot size”. This measure of assessment is not considered to be appropriate in every circumstance as the plot size does not necessarily dictate the character of an area.

It is clearly important that an acceptable relationship with surrounding development is provided but we consider that these criteria could be used to restrict the development potential of sites thereby reducing efficiency. It is considered that more emphasis should be made of establishing design criteria that is appropriate for modern development and protecting existing residential amenity. There is the potential for DES 1 (b) and DES 1 (c) to come into conflict particularly in regards to plot sizes and layouts. It is our opinion that there should be a greater level of flexibility built into the policy in particular with regards to ‘respecting the prevailing pattern of plot size’. Such an approach could have a negative impact on the viability of potential schemes therefore affecting delivery of these.

this comment.

Policy now requires new development to: "3) Have due regard to the layout, density, plot sizes, building siting, scale, massing, height, and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site."

A sentence can be added to the reasons section to clarify that this should not prevent innovation or originality in design, as long as it respects the local character.

reference is made to the locality and where local amenity is respected."

<p>Part f) requires “discrete” waste storage however “appropriate” would be a better broader terminology for the policy to adopt, as that would ensure that waste storage is also of an appropriate size.</p>	<p>Policy has been updated to read: "7) Provides for accessible and sensitively designed and located waste and recycling bin storage "</p>	<p>DES1 (f) has been updated</p>
<p>Part m) requires SUDS provision on all developments. SUDS should only be a requirement on major schemes in line with policy approach CCF2(g). Additionally, SUDS shouldn't be required on applications proposing a change of use, particularly where no operational development is proposed as there would be no increased run-off. In its current form this part of the policy is overly prescriptive and burdensome on small development and businesses and in turn could stifle economic development in the Borough.</p>	<p>This has been moved to Policy CCF2 which covers flooding. The wording has been updated to be more in line with the NPPF as follows:</p> <p>4) Development should reduce surface water run-off rates using Sustainable Drainage systems where necessary, suitable to the scale and type of development. Where Sustainable Drainage Systems are proposed, schemes should include appropriate arrangements for the ongoing maintenance for the lifetime of the development.</p>	<p>Wording moved to CCF2 and updated for compliance with NPPF</p>
<p>DES1:1(h) - ‘where applicable’ should be deleted, as the text already refers to ‘appropriate’.</p>	<p>It is considered that where applicable is appropriate to include as this will not be applicable to all development</p>	<p>No change</p>
<p>If there are homes to be built in Horley town centre they should be built with lifts for the over-50s. Older people would downsize their homes if they could live in the centre of town.</p>	<p>Policy DES8(5) requires that a certain % of units over a certain threshold should be designed to meet the building regulation requirements for accessible and adaptable dwellings, and a certain % should be designed in accordance with the building regulations requirements for wheelchair user dwellings.</p>	<p>No change</p>



<p>Agree development should not be as it was, knock down a house and stick a road of houses in - too much pressure on community resources when money is not put in and turns villages into towns. Need to use more brown land, disused areas and not build on green belt or over develop communities. Nice to keep building authentic to the area so it blends with what is there already, other wise becomes a hotch botch of buildings.</p>	<p>Policy DES1 contains a clause calling for developments to maintain the local character as much as possible. The plan aims to prioritise brownfield sites and previously developed land, and only to use greenbelt land for housing if and when the council can no longer demonstrate the five year housing land supply required by national policy.</p>	<p>No change</p>
<p><b>Best use of land/SC1</b> - "Best use of land" must clearly allow ease of accessibility and not contribute to current road traffic overloads.</p>	<p>Noted and agreed, and this is discussed in Policies DES1(1)[i] and TAP1.</p>	<p>No change</p>
<p><b>Best use of land/SC1</b> - The "best use of land" though doesn't mean building as many houses as possible. Planning should include plenty of space for parking, plenty of green areas and common areas.</p>	<p>The plan does not aim to build as many houses as possible; in line with the Core Strategy adopted in 2014, the Council is planning for the provision of a total of at least 6,900 homes over the plan period from 2012-2027, equivalent to an annual average provision of 460 homes per year, which the Government require us to deliver. The number comes from analysis of the levels of need and demand for housing in the borough, an assessment of housing land supply and consideration of the social, economic and environmental implications of housing growth.</p> <p>Parking is considered in Policies DES1 and TAP1, open and common spaces in OSR1, and green spaces in NHE4 and NHE5.</p>	<p>No change</p>

<p><b>Best use of land/SC1</b> - 'the best use of land' is ill-defined and requires clarification. There should be a presumption of the use of brownfield rather than green belt. The disaters that are the areas around Meath Green Lane (Horley) and south of Horsham/Broadbridge Heath must be avoided at all costs.</p>	<p>The plan prioritises brownfield land over greenfield by setting out a number of potential brownfield development sites, setting out policies to restrict development on open spaces, and by setting out a phased approach to greenbelt release whereby it will only be used for housing if and when the Council can no longer demonstrate a five year housing supply as national policy requires us to.</p>	<p>No change</p>
<p>Buildings should be step free , have a hearing loop, and have a suitable walkway and colour contrast areas so that you know where you are. County Hall is a prime example of inaccessibility - many stairs, a very small lift, many dark corridors. What I would like to see is light, step-free, accessible buildings.</p>	<p>These requirements are covered in the building regulations - the Council expects all developers to meet building regulation standards, but cannot demand anything beyond these regulations of developers.</p> <p>Policy DES8(5) requires that a certain % of units over a certain threshold should be designed to meet the building regulation requirements for accessible and adapatable dwellings, and a certain % should be designed in accordance with the building regulations requirements for wheelchair user dwellings.</p>	<p>No change</p>
<p>Concern that chain shops have been taking out interesting architectural frontages and replacing them with boring ones in Banstead.</p>	<p>It is noted and agreed that it is preferable to keep interesting or unusual architectural features from existing shop buildings wherever possible, and a clause relating to this has been added. In addition, a new designation is being proposed entitled "Areas of special townscape importance" which would allow designation of areas which were considered to have some historical or architectural merit and give them an increased level of protection</p>	<p>DES10 - inclusion of "taking account of any architectural features"</p>

<p>Concern that increasing the number of businesses in Horley will destroy its character as a village.</p>	<p>Horley is considered a town, not a village, and the economic proposals made in the plan are suitable for maintaining a vibrant town.</p>	<p>No change</p>
<p>Concern that the character or 'spirit' of Banstead will change if development proposals go ahead. It was variously claimed that the proposals will change Banstead into: a 'hybrid' between town and village; a characterless suburbia; a dormitory town for London; an inner-city jungle; another anonymous town; an urban commuting area; just another high street like anywhere else; an extension of Croydon; an extension of Sutton; a place with as much crime as Purley; and a red-brick urban wasteland.</p>	<p>The plan aims to maintain the character of existing towns and villages through the policies, particularly those on town and local centres. At the same time, it is important that the plan not try to fix a particular vision of a town or village - the built environment and the economy is dynamic and changing, and our towns and villages must reflect this.</p> <p>The amount of housing proposed for Banstead is relatively small, and is not considered likely to substantially affect the character of Banstead.</p>	<p>No change</p>
<p>Density, height, mass and bulk of new developments should be guided by that for adjoining existing houses.</p>	<p>DES1(3) requires development to have due regard to the layout, density, plot sizes, scale, massing, height, and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site.</p>	<p>No change</p>

<p><b>DES1</b> - concerned at the current and proposed residential development of a dense 'city' type which is altering the character of Reigate. Family houses, even small ones, should always have a garden area</p>	<p>DES1 requires that development makes efficient use of land whilst taking into account, and respecting, local character and levels of accessibility to infrastructure and services. Some areas may support more dense development but any development will have to respect the existing local area.</p> <p>DES5(6) requires tha all new accommodation must make provision for outdoor amenity space, including balconies and roof terraces, accessible to each dwelling unit and, where appropriate, communal outdoor space.</p>	<p>No change</p>
<p><b>DES1</b> - Croydon expects this policy to be positively applied and not to restrict appropriate housing supply and development</p>	<p>The policy does not attempt to restrict housing supply, merely to ensure it takes place in an appropriate manner.</p>	<p>N/A</p>
<p><b>DES1</b> - has to consider the massing of existing buildings. In Horley the Russell's Square development is a high blot not in keeping.</p>	<p>DES1(3) requires development to have due regard to the layout, density, plot sizes, scale, massing, height, and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site.</p>	<p>No change</p>

<p><b>DES1</b> - In my view since available land is finite we as a priority have to consider increasingly the building of 2 3 or even 4 floor apartment blocks similar to those in Prices Lane in landscaped settings</p>	<p>Noted and agreed. Such developments are supported in appropriate locations but may not be appropriate in all locations. Policy CS10 of the Core Strategy states that "Development will make efficient use of land, giving priority to previously developed land and buildings within the built up areas; [and] be at an appropriate density, taking account of and respecting the character of the local area and levels of accessibility and services".</p>	<p>No change</p>
<p><b>DES1</b> - Making sure that the appropriate housing mix complements the sites character and setting and that the sites viability isn't effected by the housing mix on individual sites</p>	<p>The need for housing mix to address issues of local character and viability is covered in Policy DES4. In developing the policies, the financial impacts of each policy is assessed.</p>	<p>No change</p>
<p><b>DES1</b> - New buildings and structures depending on their height (not just restricted to 'tall' buildings), location and design have the potential to impact on airport operations, through interference with navigational aids and infringement of the protected surfaces around the airport. Cranes and other tall construction equipment must also be considered. Therefore we would be grateful if the following or similar could be added 'Respect aerodrome safeguarding requirements'.</p>	<p>This has been put into DES1 to ensure that this is taken into account as an integral part of design of all buildings.</p> <p>Respect aerodrome safeguarding requirements' added as new clause DES1(14) and following wording added to the reasons section:</p> <p>Applications for development within the identified aerodrome safeguarding zone must consider aerodrome safeguarding requirements. These requirements cover a number of aspects including; tall structures, wind turbines and blue/green infrastructure. More information is available on the Gatwick Airport website.</p>	<p>Policy and reasons section updated to refer to aerodrome safeguarding</p>

<p><b>DES1</b> - Part I) of the draft policy encourages microgeneration to be considered for new development. However, this goes beyond the current requirements of Building Regulations and should be omitted.</p>	<p>While the legal position of the building regulations means that councils cannot ask for additional energy efficiency requirements in new developments beyond what would have been level 4 of the Code for Sustainable Homes, it has been shown by a number of recently adopted plans that encouragement of renewable energy generation in new developments is still perfectly allowable.</p>	<p>No change</p>
<p><b>DES1</b> - The Council should insert an additional policy criteria which states that consideration will be given to the design, scale and massing of the existing built form, with redevelopment applications viewed favourably where they better assimilate into the surrounding area than the building which presently or most recently exists.</p>	<p>The policy does require that local distinctiveness is promoted and reinforced through the use of high quality materials, landscaping and building detailing, must respond appropriately to character and must respect dimensions, layout etc for all development whether on brownfield or greenfield. When a planning application is assessed by the Development Management team they assess all elements of the application i.e. design, access, movement generated and will give appropriate weight to each component. If the design of the development is an improvement on the existing then this will be reflected in the weight that is given to it, so it is not felt it is necessary to include this when it is covered in practice.</p> <p>Direct reference to the need to go beyond aesthetics and consider connections between people and places has been included in the reasons sections</p>	<p>Reference to connection between people and places added to the reasons section</p>

<p><b>DES1</b> - With regard to (j) and microgeneration, wind turbines need explicit treatment: proximity to neighbours, noise and prominence above ridge lines should be referred to. Solar heating and photovoltaic panels should lie on roofs and not protrude above ridge lines.</p>	<p>It is believed that this would be an overly prescriptive approach to take, which would not be in the spirit of national policy. The existing policies provide enough justification for rejecting inappropriate renewable energy developments, without making it unduly arduous to bring such proposals forward. In particular NHE1 makes reference to the visual impact of renewable energy developments and DES9 makes reference to impact of noise, air and light pollution arising from development.</p>	<p>No change</p>
<p><b>DES1</b> g) i words “as appropriate “ should be omitted.</p> <p>j) After networks add “by maintaining and adding to existing green corridors or, where feasible, establishing new concentrations of greenery to establish a high level of integration with the natural environment. ”</p> <p>m) Second sentence should be changed to say “All developments should include measures to achieve a reduction in the existing run off rate”. It might also be helpful to give examples so as to steer developers.</p>	<p>(g) - this point is covered by NHE3 so to avoid duplication reference to loss of existing features has been removed (j) - this point is covered by NHE4 so to avoid duplication this has been removed (m) - This has been moved to policy CCF2 as well as this is a more appropriate location for this. Wording has been updated to ensure consistency with national planning policy and to remove detail that did not need to be in a local policy but will be required in flood risk assessments as a matter of course. Examples will be provided in a forthcoming Supplementary Planning Document on SUDS. The policy does state: 3) Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding.</p>	<p>No change</p>

<b>DES1:</b> Waste storage Should 1(f) refer to “discreet” rather than “discrete”?	DES1 (7) has to be updated to refer to accessible and sensitive designed and located waste and recycling bin storage	DES1 (7) wording updated
DES1:1(c) - A reference to soft landscaping should be added to this sentence.	Reference to hard and soft landscaping is included in DES1(8)	No change
DES1:1(g) - Add point [iv], stating ‘providing street trees where appropriate and making a contribution to their future management’.	Reference to street trees included in DES1 (4)	Reference to street trees included in DES1 (4)
DES1:1(h) - should be expanded to add 'Development should taper on the Green Belt boundary to provide an appropriate transition'. Or this could be made into point (n)	DES1 (9) This is already adequately covered by the use of the word 'appropriate'.	No change
DES1:1(i) - There should be a specific reference to ‘visitors parking’ in addition to ‘parking’ as this need is frequently ignored by developers.	DES1 (10) - Making provision for visitors would come under the use of the words 'adequate provision', and visitor parking will be included in the final parking standards which will form part of this document.	No change
In Redhill the new Sainsbury's is an eyesore and disconnects the town centre both visually and literally from the park. Who is thinking about these developments in relation to each other?	The policies in the adopted Core Strategy and the emerging DMP seek to ensure that design has due regard to the layout, density, plot sizes, building siting, scale, massing, height, and roofscapes of the surrounding area and the relationship to neighbouring buildings, whilst making most efficient use of land. Design is an extremely subjective area of discussion, it cannot ever be guaranteed that the results will please all of the people all of the time.	No change



<p>Inadequate strategic design for urban density and massing in Redhill.</p>	<p>It is difficult to strategically plan for massing, as each development will need to be assessed as part of a planning permission on a case by case basis and national policy also notes that design polices should avoid unnecessary prescription or detail.</p>	<p>No change</p>
<p>Note this does not mean "cram in tiny flats at extortionate prices and encourage increased car use"</p>	<p>Policy DES4 calls for an appropriate mix of housing sizes, taking account of the most up to date assessment of housing need, and includes a requirement for larger developments to provide a certain % of three and four bedroom houses.  Policy DES5 requires that development as a minimum must meet the relevant nationally described internal space standard for each individual dwelling except where the Council accepts that an exception to this should be made in order to provide an innovative type of affordable housing that does not meet these standards.  Policy TAP1 calls for a reduction in car use as much as possible, well designed access routes for walking and cycling, and national policy also promotes development in the most sustainable and accessible areas.</p> <p>Local planning policies cannot control house prices.</p>	<p>No change</p>
<p>Reigate and Banstead needs to maintain improvements but retain character.</p>	<p>Noted and agreed - this is what the plan is seeking to achieve within the the parameters set out in national planning policy</p>	<p>No change</p>

<p><b>SC1</b> - But it should be recognised that in some locations it will be appropriate for the character of the area to change e.g. to higher density housing but this should be managed</p>	<p>This is agreed, but it is felt that it is appropriately reflected in the 2014 Core Strategy, where paragraph 6.3.8 states: "more efficient use of land and buildings within existing centres will be promoted, with higher density redevelopment where appropriate". As this is a more strategic-level document, it is the more appropriate place for this kind of policy discussion. Overall the Core Strategy and the Development Management Plan seek to strike a balance between supporting necessary growth and protecting the existing and natural environment to ensure a high quality of life for those living and using the Borough.</p>	<p>No change</p>
<p><b>SC1</b> - It should apply across the board including changes to land use and existing development</p>	<p>The policies in this plan would apply to any development that requires planning permission, including relevant changes of use; however, we cannot retroactively apply new policies to existing developments.</p>	<p>No change</p>
<p><b>SC1</b> - Let's try to keep a more rural feel about the place, when planning .</p>	<p>The vast majority of the borough continues to be rural land, including almost 70% of the Borough as Green Belt even if the sustainable urban extensions were developed. Policies requires that local character must be taken into account for any planning application</p>	<p>No change</p>

<p><b>SC1</b> - Not sure it's possible to protect local character of small town surrounded by green fields if you intend on building on them</p>	<p>National government require that the Council maintain a 5 year housing land supply in order to deliver the Boroughs housing target of 460 homes a year. The plan aims to meet the borough's housing needs over the coming years while maintaining a high quality of life for residents. Open space will be protected under Urban Open Space designations Building will only take place on greenbelt land if and when the council cannot demonstrate the five year housing land supply required by national policy. Without making a plan for such an eventuality, the borough would be at risk of 'planning by appeal', led by developers and leading to a much less ordered approach that takes less account of the quality of life of local residents.</p>	<p>No change</p>
<p><b>SC1</b> - we would like to see more flexible approaches for residents within rural areas as long as it is sympathetic and doesn't cause issues to neighbouring properties.</p>	<p>The vast majority of rural land in the borough is located within greenbelt designations, which limits the amount of flexibility that can be provided in line with national policy.</p>	<p>No change</p>

<p><b>SC1/Redhill</b> - There is ample space in Redhill for housing development which would be enthusiastically sought after but little seems to be happening. Why has the Odeon scheme stalled? This would be a perfect opportunity to build on brown field sites.</p>	<p>Unless the Council owns the land they cannot require a land owner or developer to build out a planning permission or submit a planning application. A condition is usually put on a planning application requiring this to commence within a certain time limit (usually three years). There are a number of reasons why a scheme may stall, such as unexpected costs, the need to complete further investigations which were conditioned in the planning permission etc.</p> <p>Where the Council do own land they are bringing schemes forward, such as Marketfield Way in Redhill which was recently granted permission for residential, retail and leisures uses.</p> <p>The DMP will identify sites which are considered suitable for specific uses within the urban area. This process can encourage land owners to bring these sites forward, as they will have more comfort that a planning application is likely to be permitted.</p>	<p>No change</p>
<p><b>SC1/Redhill</b> - Some of Redhill's new buildings have not met this local character and distinctiveness criteria. Though I applaud the retention of the High Street façade (east)</p>	<p>Existing development will have been judged against existing planning policies, whereas this consultation was about emerging planning policy. However, the emerging policies do not intend that all design must be a replication of the existing, rather that it must respect and enhance the existing. In addition, design is a very subjective topic.</p>	<p>No change</p>
<p>Should also be accepted that all development will change the character of an area...but change should not always be seen as detrimental.</p>	<p>Noted and agreed, and it is believed that the policies as written will shape that change in acceptable ways.</p>	<p>No change</p>

<p>The phase 'makes the best use of land' is ambiguous and perhaps deliberately unclear.</p>	<p>The wording is deliberately 'high level' as this is an objective - the meaning is then clarified by the detailed policies.</p>	<p>No change</p>
<p>The plan addresses the promotion of recycling facilities in new development but makes no reference to the benefits of using recycled aggregates. Hence the county council wishes to see design policies specifically include the promotion of sustainable construction and demolition techniques that provide for the efficient use of minerals including a proportion of recycled or secondary aggregates.</p>	<p>Core Strategy CS10 and CS11 both refer to sustainable construction. It is proposed that wording be added to CCF1 reasoned justification as follows: " Sustainable construction methods and materials, such as the use of recycled or secondary aggregates, should be considered."</p>	<p>wording be added to CCF1 reasoned justification as follows: " Sustainable construction methods and materials, such as the use of recycled or secondary aggregates, should be considered."</p>
<p>Retrospective planning should be very strongly discouraged and only tolerated if a heavy penalty were imposed. If the unapproved development does not conform to the relevant planning rules it should either be removed or altered so that it is in full compliance, again with a financial penalty.</p>	<p>Any existing development which must apply for retrospective planning permission will be judged against the same criteria as any other development - if it does not accord with planning policy then the Council can require that the development is removed and the site is returned to its original state.</p> <p>An example of where this happened was the case of Mr Fidler, who attempted to use loopholes to avoid the proper planning permission process, was found to be in breach of the policies, and was eventually forced to demolish the building he constructed.</p> <p>The Government issues a ministerial statement in August 2015 which set out how the government is concerned about the harm that is caused where the development of land has been undertaken in advance of obtaining planning permission. lthe statement</p>	<p>No change</p>

	<p>introduced a planning policy to make intentional unauthorised development a material consideration that would be weighed in the determination of planning applications and appeals.</p>	
<p>This policy simply aims to make it easier for the council to build on green belt and impose compulsory purchase orders.</p>	<p>It is unclear in what way this is so. National government requires us to identify land to accommodate our housing needs. As such, in line with the Core Strategy adopted in 2014, the Council is planning for the provision of a total of at least 6,900 homes over the plan period from 2012-2027, or 460 homes per year.</p> <p>National policy requires Councils to identify key sites which are critical to the delivery of the housing strategy over the plan period, which this emerging Development Management Plan seeks to do. Some of these key sites proposed are currently within the Green Belt. In line with national policy, they would be removed from the Green Belt but would be protected as if they were Green Belt and <u>only</u> released for development should all development sites in the urban areas have <u>been exhausted</u>, which may not even happen.</p> <p>It is unclear in what the DMP is making it easier for the Council to use compulsory purchase orders - these powers are bestowed by national legislation and only be used as a last resort and must be for the greater public good.</p>	<p>No change</p>

<b>BACK GARDEN LAND</b>		
DES2:1(b) - 'siting' instead of 'sited'.	Agreed	sited' changed to 'siting' on DES2 1) b).
DES2:1(d) - omit 'where possible'.	Agreed	"and where possible incorporate" removed
DES2:2 - In the second sentence, omit 'seek to'.	Agreed	2) "seek to" removed
DES2:2 - the policy can be strengthened by adding 'strongly' in front of 'resisted' or changing 'resisted' to 'refused' in the first sentence.	The policy is seeking to protect street frontage aesthetics, which is in line with the NPPF's core principles regarding design, and specifically paragraph 58. It is also in line with SCC guidance on vehicle crossover points to take account of street aesthetics. 'Resisted' is a constant phrasing used throughout the document.	No change
DES2:2 - Perhaps consideration could be given to referring to percentages or length of run between accesses so that there is clearer guidance for potential developers.	National policy states that local design policies should avoid unnecessary prescription or detail. It is considered that this would be overly prescriptive	No change
DES2 - there should be a specific policy in future to prevent planning applications by speculative developers being accepted in areas, which are in danger of being overdeveloped	A policy like this would be too prescriptive and it is felt that the policies proposed are adequate to support the Development Management team who will take account of the context of an area when making a decision on planning applications.	No change

<p>DES2 - This does not appear to correspond with the supporting text or overall objective of making all round best/most efficient use of land as in. Section (2) of the policy relates to street frontage appearance rather than back gardens which means that developers will be more restricted in terms of using sites located to the rear of existing housing.</p>	<p>The requirements of the policy are in line with national planning policy and the Council's published Core Strategy in accepting that back gardens can sometimes provide a resource for efficient use of land for housing supply, but also understanding that local amenity and character as well as considerations such as local biodiversity will also need to inform decisions about development in back gardens. Paragraph 53 of the NPPF specifically states that local plan policy should address inappropriate development in back gardens, taking account of the character of an area.</p>	<p>No change</p>
<p>DES2 - the existing policies of the Housing Section of the existing Reigate and Banstead Local Plan (2005) and in particular Ho9, Ho13, 14 and 16 should be incorporated, where relevant, in DES2.</p>	<p>The housing policies from the Local Plan 2005 have been incorporated into a number of different policies in the plan. As such, they do not need to be repeated in DES2.</p>	<p>No change</p>
<p>Recognition should be given to the 2010 Planning Minister's Planning Statement that back gardens should be reclassified from brownfield to greenfield sites, as this does not appear to be out of line with paragraph 53 of the National Planning Policy Framework.</p>	<p>The NPPF glossary states that previously developed land excludes land in built-up areas such as private residential gardens. These considerations are taken into account when assessing planning applications, so it is not considered necessary to specifically refer to this here.</p>	<p>No change</p>
<p>It is considered inadequate, to protect fully the character of an area such as Nork where back garden development is becoming excessive and is in danger of destroying the character of the area contrary to Core Strategy policy. Suggestion:</p> <ol style="list-style-type: none"> <li>1) The cumulative impact of several schemes close together (not just access)</li> <li>2) A limit on the overall number of units in a scheme</li> <li>3) The need to consider a cap on overall additional</li> </ol>	<p>Comment is noted.</p> <ol style="list-style-type: none"> <li>1) DES1 and DES2 cover impact on character and the amenities of neighbours.</li> <li>2) Not be suitable to set an arbitrary limit of ten units per scheme, because impacts upon amenity will always depend upon the individual nature of the scheme and the access point.</li> </ol>	<p>No change</p>



<p>housing in certain areas 4) A statement on the need to channel infrastructure payments to fund improvements in local facilities in the areas where the funds are collected.</p>	<p>3) It would not be appropriate to include a cap on the number of back gardens that can be built on, the policies proposed in the DMP are intended to ensure elements such as neighbouring amenity etc are protected. Policy TAP1 sets out the traffic considerations that must be taken into account for all planning applications.</p> <p>4) With regard to infrastructure payments for additional facilities in areas affected by back garden development, this would happen through the established Community Infrastructure Levy (CIL) policy.</p> <p>Reference is also made to tandem development and the impact that this can have</p>	
<p><b>DES2</b> - Supported with a stipulation that the developer should provide a band of green screening at the rear boundary of the original houses and those that are newly built.</p>	<p>The general design policy for new development - Policy DES1 - includes provision for ensuring that overlooking and loss of privacy are not an issue. DES1 also states that landscaping should be incorporated into new developments to mitigate any impacts</p>	<p>No change</p>

<p><b>DES2</b> is appropriate as it is in line with paragraph 53 of the NPPF. Part c) is considered to be overly prescriptive as development to the rear of existing frontage development will have its own character, partially reflective of the period of construction and therefore shouldn't be required to conform to certain existing development forms or styles as this is contrary to paragraph 60 of the NPPF. Providing the character of the street scene and local distinctiveness, comprising the frontage development is maintained, any development to the rear should not need to replicate the same plot widths, garden depths or spacing between buildings.</p>	<p>Comment is noted - DES2 (1c) has been updated to clarify that this refers to infilling rather than back garden land</p>	<p>DES2 (1c) updated</p>
<p><b>DES2</b> - goes into specifics relating to all gardens which appears to be outside of the remit of its title. Restricting general potential for developing urban gardens as tightly as in this policy does not appear to correlate with the aim of making all round best/most efficient use of land as in the supporting text.</p> <p>Policy DES2 (2) again refers to street frontage appearance rather than back gardens which limits the potential flexibility for accessing sites and encouraging greater likelihood of 'ransom strip' situations. Therefore there are side implications hampering developers' ability to realistically achieve schemes behind existing housing.</p>	<p>The policy has been amended to make clear that it applies to residential garden land, including infilling, bringing it more in line with the NPPF definition.</p> <p>The requirements of the policy are in line with national planning policy and the Council's published Core Strategy in accepting that residential gardens can sometimes provide a resource for efficient use of land for housing supply, but also understanding that local amenity and character as well as considerations such as local biodiversity will also need to inform decisions about development in back gardens. Paragraph 53 of the NPPF specifically states that local plan policy should address inappropriate development in back gardens, taking account of the character of an area. DES2 (2) is in regard to the potential impacts of back garden land development upon the frontages of residential properties, in particular regarding access points.</p>	<p>No change</p>

<p>DES2 additional wording in b) as follows:- b) be of a height, bulk and mass, and sited, to ensure the development does not appear prominent and conspicuous within the existing street scene or have a significant detrimental impact on the amenity of occupants of existing nearby buildings. Although DES1 (d) deals generally with amenity issues, the reality is that back-garden developments are particularly difficult for occupants of neighbouring properties who may well have purchased their properties specifically because of the green outlook afforded by their own and neighbouring gardens.</p>	<p>DES1 covers all types of development, so it is not considered appropriate to repeat this in DES2. However, the wording in DES1 has been strengthened. Additional wording has also been added to the policy which note that proposals resulting in piecemeal or tandom development will be resisted.</p>	<p>DES1 wording strengthened</p> <p>Additional wording has also been added to the policy which note that proposals resulting in piecemeal or tandom development will be resisted.</p>
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<p><b>DES 2</b> - I recognise that the Core Strategy is already in place and that it does not, in principle, preclude back-garden developments. However I would point that other Core Strategies exist around the country that prohibit back-garden development, including that of the London Borough of Harrow. They rightly wished to focus on prioritising the brown-field development opportunities in their Borough and to respect their existing residents' rights to enjoy their properties. The Harrow Core Strategy had to be, of course, agreed by HM Inspectorate. I regard the lack of a similar approach in RBBC to be a missed opportunity to protect your existing residents' amenity.</p>	<p>The Core Strategy contains an overarching strategy to use brownfield/regeneration land first, before allocating land within the Green Belt, and Policy CS10 includes the need to make the most efficient use of land whilst taking account of the character of the local area. Paragraph 7.1.7 sets requires the DMP to including a policy regarding the development of garden land. As such, this Policy DES2 seek to balance the need for efficient use of land with the need to protect development on residential gardens. The policy has been updated for further clarity and protection.</p> <p>With regard to Harrow, the London Plan states that "Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified. This does not apply to local authorities outside of London.</p>	No change
<p><b>DES2</b> - This policy is being relaxed. We are raising this policy change as a concern now and we will look at the detailed drafting in conjunction with the other related policies and raise amendments at a later stage in discussions with the Council or at Examination.</p>	<p>The policy has been updated since Regulation 18 taking account of comments made and is considered to provide a suitable additional level of protection over and above that covered by DES1. However, the policy approach is not to repeat elements that are covered by other policies.</p>	No change

<p><b>DES3</b> - DMP must include a reasonable cap on the number of back gardens that can be built on and a much more detailed analysis of traffic flow &amp; maximum car limits must also be looked at.</p>	<p>It would not be appropriate to include a cap on the number of back gardens that can be built on, the policies proposed in the DMP are intended to ensure elements such as neighbouring amenity etc are protected. Policy TAP1 sets out the traffic considerations that must be taken into account for all planning applications.</p>	<p>No change</p>
<p><b>DES3 (Nork)</b> - The only land areas that seem to be available in Nork for development are backgardens. These need to be managed carefully</p>	<p>Comment is noted - this is what policy DES2 seeks to achieve alongside all the other policies in the DMP.</p>	<p>No change</p>

<p><b>DES2:</b> The policy requires developments to reflect scale, form and materials (a) and plot widths, front garden depths and spacing between buildings (b). The wording should be amended to state “respects” instead of “reflects”. It is impossible to increase density within the urban area if the above points have to reflect existing areas.</p> <p>This policy is overly onerous, particularly the reference to incorporating front garden depths which prevail in the locality. In reality this would not be possible and would reduce the number of units achievable meaning sites become completely unviable. Also there is reference to multiple closely spaces access points. Inspectors have repeatedly found this situation to be ok depending on context so we would like to see this reference removed.</p>	<p>This comment has been noted. It is recognised back garden housing is an important source of housing and that if well designed, back garden development, represent a type of development that can help make the most efficient use of land in the Borough. Poorly designed, back garden development has the potential to impact on the character and residential amenity of the local areas and therefore proposed policy DES2 seeks to ensure the proposed back garden development should meet the character and appearance of the surroundings in relation to both the immediate vicinity and also the broad locality within which a site is situated.</p> <p>In relation to multiple access points, Council feels that the proposed approach outlined in DES2 is appropriate. As the comment states, 'Inspectors have found this situation to be ok depending on context'. Proposed policy DES2 is not implying that there cannot be multiple access points, but rather that the local context (i.e. the character and appearance of the existing street frontage) should be taken into consideration.</p>	<p>No change</p>
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RESIDENTIAL AREAS OF SPECIAL CHARACTER		
DES3 - Add (10) 'Buildings of local architectural or historic interest which are not locally listed but which contribute to the areas heritage will not be demolished or significantly modified unless there is strong justification.'	The NPPF allows for appropriate weight to be given to non designated heritage assets when deciding planning application - it goes on to state that in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. NHE7 has been updated to be more consistent with national policy.	NHE8 updated
RASCs - Some areas of Nork e.g Hillside, Burgh Wood, Tumblewood, Buckles Way Green Curve, Nork Way, etc., should be considered as residential areas of special character.	Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. Nork Way, Hillside, Burgh Wood, Tumblewood, Buckles Way, and Green Curve have been assessed against the stipulated criteria and they don't comply with the criteria for RASC designation.	No change
RASCs - The new Tadorne Road designation and The Avenue extension should be extended into Downsway, particularly on the western side of the road.	Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. A further RASC extension into Downs Way, including on the western side of the road, have been assessed against the stipulated criteria and they don't comply with the criteria for RASC designation.	No change

<p>RASCs - These appear to be all in high-price areas, Where are the lower-priced but visually coherent areas like parts of Earlswood?</p>	<p>The title of the designation - Residential Areas of Special Character (RASC) - is not intended to cover all residential areas that have special character, but to protect some specific characteristics of certain areas. The RASC designation was in response to preserving an aspect of the borough which can be seen as locally distinctive and unique (which is a requirement of national planning policy within the NPPF - to preserve sense of place). RASCs are a low-density style of residential neighbourhood with abundant landscaping and mature trees. The designation's purpose is not to shield these areas from development, but to ensure that further development within them doesn't detract from what is regarded as an important feature of residential areas in the borough, in terms of style and character. It is equally important to protect and preserve other respect the character of the surrounding area 'including positive physical characteristics of local neighbourhoods and the physical appearance of the immediate street scene' which is required by Policy DES1, which applies to all development in the borough.</p>	<p>No change</p>
<p>RASCs need to be retained and extended, especially in Tadworth to preserve the character of the area.</p>	<p>Existing RASCs, those proposed in the Regulation 18 DMP document and any additional areas suggested through the Regulation 18 consultation (which were assessed and found to be in line with the RASC criteria), will be brought forward under the RASC designation in the DMP.</p>	<p>No change</p>



<p>The RASC in Tadworth should be extended along the full length of the Avenue to include both sides of the road up to the corner of Kingswood Road i.e. including Avenue Close, 43 to 51 The Avenue up to the Catholic church, and all the properties bordering or near to the Ancient Woodland.</p>	<p>Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. A further RASC extension along The Avenue (including to Kingswood Road/the Church, properties near the ancient woodland, and Avenue Close) has been assessed against the stipulated criteria and it doesn't comply with the criteria for RASC designation.</p>	<p>No change</p>
<p>Properties along The Avenue, Avenue Close including 43-51The Avenue, Holmwood and Newlands and all properties adjoining the ancient woodland around Lothian Wood should be added to the RASC.</p>	<p>Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. Holmwood, Newlands, and a further RASC extension along The Avenue (including to Kingswood Road/the Church, properties near the ancient woodland, and Avenue Close) have been assessed against the stipulated criteria and do not comply with the criteria for RASC designation.</p>	<p>No change</p>
<p><b>DES3</b> - The list or RASCs is far too limited and a case can be made for other Reigate areas. I believe local residents should be consulted on this</p>	<p>The DMP Regulation 18 consultation has provided an opportunity for further suggestions for RASC designated areas. Suggestions for RASCs that have come forward as part of this consultation have been assessed and some agreed for RASC designation going forward.</p>	<p>No change</p>
<p><b>DES3</b> - 5. Existing tree cover, landscaping, green areas and vegetation are retained or replaced, and where possible enhanced, using appropriately-sourced, native species, whenever possible.</p>	<p>The Development Management Plan is not able to be overly prescriptive, so it would not be appropriate to require species are sourced from a specific location or are a specific species. The inclusion of "appropriate species" is felt to reflect that the choice of species should be appropriate to the area. This is supported by the Reigate and Banstead Local Distinctiveness Design Guide.</p>	<p>No change</p>

<p><b>Kingswood</b> - If there is to be any development in Lower Kingswood, residents also do not wish to unbalance the size, scale and character of existing properties in and around the village</p>	<p>The DMP includes a design policy (DES1) which now stipulates that development must have due regard to 'layout, density, plot sizes, building siting, scale, massing, height, roof-scapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site'.</p>	<p>No change</p>
<p><b>DES3</b> concerns the RASCs and the potential for the existing designation to be extended along with new designations. It is not clear why these additional areas warrant the designation. It is considered that policies DES1 and DES2 could adequately control development in these areas to maintain their key attributes. The plan should also consider as an option the removal of the RASC designations with greater reliance on design related policies for maintaining character. Policy approach DES3 adds little to the requirements of DES1 and DES3.</p> <p>Criterion 7 is contradictory as the first part prevents any sub-division of plots whereas the second part suggests that this is acceptable subject to the plots not being significantly smaller than those prevailing in the area. It is the high levels of mature landscaping, amenity and spacious ambiance which provides the RASCs with their character and the plot size is not determinative of this. The policy should be reworded to preclude subdivision which would result in plots appearing smaller than those which characterise the area.</p>	<p>The RASC designation is included in the DMP in response to the need (set out in national planning policy) to maintain local distinctiveness and sense of place, and the RASC-designated areas are considered to be a unique and locally distinct feature of the borough, with verdant landscaping, mature trees, and set back development. It is agreed that criterion 7 is not clear, and this has been reworded in the Regulation 19 publication document.</p>	<p>Rewording of criterion 7: The proposal "does not involve inappropriate sub-division of existing curtilages to a size below that prevailing in the area"</p>

<p><b>DES3</b> - I would question the value and purposes for retaining the local RASC designation.</p>	<p>The RASC designation is included in the DMP in response to the need (set out in national planning policy) to maintain local distinctiveness and sense of place, and the RASC-designated areas are considered to be a unique and locally distinct feature of the borough, with verdant landscaping, mature trees, and set back development.</p>	<p>No change</p>
<p><b>DES3</b> - Not opposed to changes and newly designated areas. The choice of new areas seems arbitrary. It is not clear at whose initiative the new areas were chosen. It must be stated that there are several other roads and streets in Area 1 that are comparable in character to and manifest similar characteristics to Tadorne Rd, notably most of Epsom Lane S that adjoins, as well as Garrard Rd and Monks Rd in Banstead. It is also not clear what protections are afforded by RASCs, they have signally failed to stop the erosion of the intended character of those in Kingswood.</p>	<p>Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. Epsom Lane South had been already assessed in April 2015 and rejected regarding RASC designation in the April 2016 evidence paper. Neither Garrard Road nor Monks Road fulfil the criteria for RASC.</p> <p>The RASC designation was in response to preserving an aspect of the borough which can be seen as locally distinctive and unique (which is now a requirement of national planning policy within the NPPF - to preserve sense of place). RASCs are a low-density style of residential neighbourhood with abundant landscaping and mature trees. The designation's purpose is not to shield these areas from development, but to ensure that further development in them doesn't detract from what is regarded as an important feature of residential areas in the borough, in terms of style and character.</p>	<p>No change</p>

<p><b>DES3</b> - CRA support the policy of extension [of RASCs]and would suggest the addition of Bridge Way as a RASC.</p> <p>Clarification would be useful on how enforceable the RASC parameters are and whether these policies clearly identify the nature and character of the area that makes up its local distinctiveness that is being protected. To be effective, should it have better definition?</p> <p>A proposed development that met the exterior design and building parameters for single dwellings in an area but was in effect a block of flats could meet many of the criteria and might be hard to refuse given the parameters though would not be in the character of a RASC area or in any way enhance the distinctiveness.</p>	<p>Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. Bridge Way has been assessed against the stipulated criteria and do not comply with the criteria for RASC designation.</p> <p>National Planning Policy Framework paragraph 2 reiterates that planning law requires that 'applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise' and, as such, all proposals for development within a RASC must comply with the criteria of the relevant policy (along with other relevant policies). Policy DES3 on RASCs makes it clear which areas are designated as RASCs and the criteria applies to these areas. A RASC Evidence Paper is available which sets out further information on RASCs.</p>	No change
<p><b>DES3 (9):</b> I consider this need to be much stronger. A large number of people leave our wheelie bins at the front of their properties. It would be good to make sure each new property as a nice shielded area for the bins to be conveniently stored out of sight.</p>	<p>Policy DES1 requires that new development "provides for accessible and sensitively designed and located waste and recycling bin storage in accordance with the Council's guidance document 'Making Space for Waste'."</p>	No change
<p><b>DES3</b> - Add to New RASC Designations Seale Hill, Reigate RH2 8HZ to reflect and take account of the comments made by the inspector in relation to the character of Seale Hill in his refusal APP/L3625/A/12/2171704</p>	<p>Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for additional Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. Seale Hill fulfills the stipulated criteria, and will be put forward for RASC designation in the DMP Regulation 19 publication.</p>	Inclusion of Seale Hill as RASC designation.

<p><b>RASCs</b> - why these particular areas are marked as such? It appears to me that they represent areas of Reigate which contain large, expensive houses, most of which have no particular architectural merit or historical interest. I would be grateful if you could reply and give me a logical explanation of why these areas are marked as such and what implication this label has for those areas. Can I assume that they will be excluded from any future development whilst the rest of us have the possibility of in-building and garden developments. Should consider all areas for development - none should be ruled out - as the "Residential area is special character" areas seem to have been</p>	<p>The RASC designation is not intended to cover all residential areas that have special character, but to protect specific characteristics of certain areas in response to preserving a specific aspect of the borough which is regarded as locally distinctive and unique. It is a requirement of national planning policy to preserve sense of place. RASCs are specifically a low-density style of residential neighbourhood with abundant landscaping and mature trees. The designation's purpose is not to shield these areas from development, but to ensure that further development within them doesn't detract from what is regarded as an important feature of residential areas in the borough in terms of style and character. It is nonetheless equally important to protect and preserve other areas in respect of design merit and character, and historical merit, and these requirements are covered in policies DES1 and NHE7 of the DMP, which have been strengthened for the Regulation 19 publication document.</p>	<p>No change</p>
<p>We think there should be a new RASC designated for Horley Lodge Lane/Oak Lodge Drive. This is a significant part of the village which traditionally has had larger plots and this aspect should be maintained despite developer pressure for additional infill of new houses.</p>	<p>Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. Horley Lodge Lane/Oak Lodge Drive - whilst maintaining its own distinct, possibly arcadian, style - does not fulfill the criteria set out for RASCs, which aims to preserve the style and character of a specific type of residential development that represents the character of the borough - that is, set back with verdant landscaping and mature trees. Nonetheless, other areas of character or design merit also need protection and this is covered in policy DES1, which has been strengthened for the Regulation 19 publication. Planning applications would need to take</p>	<p>No change</p>

	account of this and other relevant policies, and material considerations, including access to the area.	
<p><b>RASC</b> - In Tadworth the RASC should be extended further down to Whitebeam Way on both sides in Downs Way and along the lower part of The Avenue on both sides down to the Roman Catholic Church and the Post Office sorting Office. We feel, as Tadorne Road has rightly been included, there is even more justification for the listing of the older roads in Tadworth, namely Chapel Road and Tower Road as RASC. the existing RASC in Tadworth namely The Avenue and Downs Way should be extended in the DMP down to Whitebeam Way and the Post Office as they seem to fit the stated criteria.</p>	<p>Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. Downs Way to Whitebeam Way and along The Avenue towards the Catholic Church and Kingswood Road have been assessed against the stipulated criteria and do not comply with the criteria for RASC designation. Chapel Road and Tower Road have already been assessed and rejected as RASC designations as part of the 2016 evidence paper.</p>	No change

<p><b>DES3</b> RASCs and Other Designations In general I am struck by the very limited designation in Tadworth as compared to the neighbouring centres of Kingswood and Walton . Many of the properties share the scale of Kingswood residences or the village centre feel of Walton. I support the TWRAs proposals for Epsom Lane South and in addition propose the following designations:- The Avenue - The extension currently in place should be adopted as recommended. In addition two further extensions are proposed:- From the current extension northwards along the western side of Downs Way as far as Whitebeam Way . eastwards from numbers 43 to 51 The Avenue. Reason These additions conform with the definition of the RASC and in the case of the former help to achieve a transition from urban to rural. In the latter the designation would also help to provide a buffer to the area of Ancient Woodland behind.</p>	<p>Subsequent to the DMP Regulation 18 consultation, we have assessed suggestions for Residential Areas of Special Character against our existing RASC criteria, set out in the RASC DMP (April 2016) Evidence Paper. Downs Way to Whitebeam Way, along The Avenue towards the Catholic Church and Kingswood Road have been assessed against the stipulated criteria and do not comply with the criteria for RASC designation.</p> <p>Epsom Lane South has already been assessed and rejected as a RASC designation as part of the 2016 evidence paper.</p>	No change
<p>On Areas of Special Townscape Importance, there should be a short explanation in the policy on what townscape characteristics are important and need protection so the designation can be defended on appeal.</p>	<p>This suggestion is not being taken forward as it is not considered necessary – buildings of architectural merit, as well as historical merit, are already covered under NHE7 and supplementary design guidance can be used to encourage locally sensitive design and the protection of important local character</p>	No change

<p><b>ASTI</b> - The concept of an Area of Special Townscape Importance seems a good idea and should be reserved for areas that are truly distinctive. In Burgh Heath there are two areas that deserve consideration, Ballards Green because of its art deco style and the border of Burgh Heath pond with the Green because of its background to the pond providing a special character. More information about criteria is necessary.</p>	<p>This suggestion is not being taken forward as it is not considered necessary – buildings of architectural merit, as well as historical merit, are already covered under NHE7 and supplementary design guidance can be used to encourage locally sensitive design and the protection of important local character</p>	<p>No change</p>
<p><b>Areas of Special Townscape Importance</b> is not considered to be required, as it is not clear how these would be distinguished from the RASC designation, which in itself is not required. Details of materials can be assessed against the general design policies which require regard to be had to the character of the area. Buildings of architectural and/or historical interest (or those possessing social, economic or industrial history) can be statutory listed, locally listed or included within a Conservation Area if they require protection.</p>	<p>This suggestion is not being taken forward as it is not considered necessary – buildings of architectural merit, as well as historical merit, are already covered under NHE7 and supplementary design guidance can be used to encourage locally sensitive design and the protection of important local character</p>	<p>No change</p>



<p>We would have liked Epsom Lane South to have been designated as a RASC but appreciate that, as it is of different character to RASCs, it may be more appropriate to have another designation and so request that it be included in an 'Area of Special Townscape Importance'. We consider that there are probably also other areas of the borough which would benefit from this designation and so support this suggestion. There would need to be a short explanation in the policy on what townscape characteristics are important and need protection so the designation can be defended on appeal.</p>	<p>This suggestion is not being taken forward as it is not considered necessary – buildings of architectural merit, as well as historical merit, are already covered under NHE7 and supplementary design guidance can be used to encourage locally sensitive design and the protection of important local character</p>	<p>No change</p>
<p><b>ASTI - The Avenue</b> From Holmwood Nursing Home along the south side of the road up and including St John's Church. This stretch of road contains properties \amenities well set back from the road with spacious grounds and containing very mature trees that are central to the distinctiveness of the road and indeed the area as this section of road is a thoroughfare.</p>	<p>This suggestion is not being taken forward as it is not considered necessary – buildings of architectural merit, as well as historical merit, are already covered under NHE7 and supplementary design guidance can be used to encourage locally sensitive design and the protection of important local character</p>	<p>No change</p>
<p><b>ASTI - We think Shelveys Way, the railway stations at Tadworth and Kingswood and the historically important Walton Heath Club House should be designated Areas of Townscape Value. new ATVs (possibly Shelveys Way, Tadworth and Kingswood and Tadworth Railway Stations and query Walton Heath clubhouse) should be considered for inclusion or separately looked at, in the latter cases, for local listing as they are</b></p>	<p>This suggestion is not being taken forward as it is not considered necessary – buildings of architectural merit, as well as historical merit, are already covered under NHE7 and supplementary design guidance can be used to encourage locally sensitive design and the protection of important local character</p>	<p>No change</p>

arguably historic sites.		
<b>ASTI</b> - The two main parades in Tadworth plus the two main Chinthurst school buildings and the Church of The Good Shepherd date back to 1906 on and we propose they should be part of an ATV to protect their special character or be locally listed (see below).	This suggestion is not being taken forward as it is not considered necessary – buildings of architectural merit, as well as historical merit, are already covered under NHE7 and supplementary design guidance can be used to encourage locally sensitive design and the protection of important local character.	No change
<b>DES 3</b> - There have been concerns in Walton on the Hill that buildings which are perhaps one of several by the same architect have been demolished. An additional point is therefore proposed. ‘10) Buildings of local architectural or historic interest which are not locally listed but which contribute to the areas heritage will not be demolished or significantly modified unless there is strong justification.’	This suggestion is not being taken forward as it is not considered necessary – buildings of architectural merit, as well as historical merit, are already covered under NHE7 and supplementary design guidance can be used to encourage locally sensitive design and the protection of important local character	No change

TALL BUILDINGS (DES4)		
There should be no high rise buildings in Banstead, i.e. three storeys or higher.	Policy DES4 has been removed, it is considered that other policies, including DES1, will suitably cover this topic.	Policy removed
<b>DES4</b> - it seems that the Council has in mind to increase high rise buildings in Redhill and this appears to conflict with the area proposed for Redhill. The town has already become dominated by buildings of considerable height which cut out natural sunlight from some pedestrian areas. If buildings are to be built higher they should be limited to 6 storeys and the need for open green areas is even more important. 13-storey building on Marketfield is inappropriate too.	Policy DES4 has been removed, it is considered that other policies, including DES1, will suitably cover this topic. and policies which cover the protection of existing open spaces and the requirement for new ones in new developments  Design is an extremely subjective area of discussion - the policies implemented by the Council are intended to provide a coherent collection of spaces and places to improve the quality of life of residents. Of course, it cannot ever be guaranteed that the results will please all of the people all of the time.	Policy removed
<b>DES4</b> - We note that The Belfry falls within an area identified (Annex 3) as being sensitive to tall buildings. This suggests that new development at the site from 4-6 storeys could be supported (subject to compliance with other policies) and that buildings over 8 storeys in height would need to be critically assessed before approval is given. We register our support for this proposed policy.	Policy DES4 has been removed, it is considered that other policies, including DES1, will suitably cover this topic.	Policy removed
<b>DES4</b> policy is not considered necessary. It is considered that there are a limited number of opportunities for tall buildings as reflected at Annexe 3. The impact of tall buildings can adequately be assessed against policy DES1.	Policy DES4 has been removed, it is considered that other policies, including DES1, will suitably cover this topic.	Policy removed

AFFORDABLE HOUSING AND HOUSING MIX		
Affordable housing should include property for rent such as Council and Housing Association accommodation.	This comment is noted. Reigate & Banstead's defines affordable housing in line with the National Planning Policy Framework: social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. A policy (DES7) has been drafted on affordable housing.	No change
The council needs to redefine its idea of what 'affordable' means when stating they will build affordable homes.	This comment is noted. Reigate & Banstead's defines affordable housing in line with the National Planning Policy Framework: social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. A policy (DES7) has been drafted on affordable housing.	No change

<p><b>DES5</b> - There is nothing about proportion of right to buy and affordable/ social housing. Will this be included once government guidance is clearer? There should be something in the DMP especially as the core strategy is now out of date. Also we expected to see more about catering for the increasing proportion of elderly – for example sheltered housing and possibly bungalows. These are major shortcomings of the Plan.</p>	<p>This comment has been noted. DES7 has been drafted to provide details on requirements on affordable housing. Right to buy is not a policy consideration.</p> <p>The Core Strategy is not out-of-date, it was adopted post-NPPF and forms part 1 of the Local Plan.</p> <p>Policy DES8 covers elderly housing and there is a requirement in some of the site allocations to provide elderly accommodation as part of the development. Policy DES5 also seeks to ensure a good mix of sized dwellings, to provide the choice for those who may wish to downsize and policy DES6 also requires a certain % of dwellings to be "adapatable and accessible" and for "wheelchair users"</p>	<p>Inclusion of DES7 Affordable Housing</p>
<p><b>SC2</b> - An appropriate mix of housing is essential but we have seen the Marketfield site stall on a number of occasions as a result of developers having to put affordable homes into the development. Developers should be encouraged/forced to build affordable housing at a an alternate location if they wish to develop executive flats in developments like Marketfield.</p>	<p>This comment has been noted. DES7 has been drafted to provide details on requirements on affordable housing which developers haveto adhere to. Planning permission will only be granted for development if the scheme includes the right amount of affordable housing in line with policy, or if the developer can demonstrate that a scheme would not be viable should they have to provide affordable housing. If this is the case, we would still seek a lesser contribution on site or a financial contribution. Where a lesser/no contribution is allowed due to viability issues, we can include a requirement in the conditions of a planning permission that stipulates should the development make more profit than envisaged the Council would be able to "claw back" some of that money to go towards affordable housing.</p>	<p>Inclusion of DES7 Affordable Housing</p>

**DES5** - Including affordable housing, with penalties if developers renege on that commitment. New housing should have adequate parking and not be allowed without parallel development of road capacity, school places, public transport and medical centres and dentists

This comment has been noted. DES7 has been drafted to provide details on requirements on affordable housing which developers have to adhere to. Planning permission will only be granted for development if the scheme includes the right amount of affordable housing in line with policy, or if the developer can demonstrate that a scheme would not be viable should they have to provide affordable housing. If this is the case, we would still seek a lesser contribution on site or a financial contribution. Where a lesser/no contribution is allowed due to viability issues, we can include a requirement in the conditions of a planning permission that stipulates should the development make more profit than envisaged the Council would be able to "claw back" some of that money to go towards affordable housing.

Reigate & Banstead have worked with infrastructure providers to understand the infrastructure requirements of the proposed development in the Development Management Plan. These are detailed in the Infrastructure Delivery Plan available on the Council's website. The Council has adopted a Community Infrastructure Levy for new residential and convenience retail, this will help to fund new infrastructure requirements.

Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in

Inclusion of  
DES7  
Affordable  
Housing

	existing or new streets .	
As the population of the region grows, housing must be provided for tradesmen and professional staff. The housing mix for new developments should include low cost housing either for sale, for co-ownership or renting. There is an undue emphasis in the document on market housing i.e. those for sale.	This comment has been noted. The affordability of housing within the borough is recognised as a key concern of local residents. Proposed policy DES7 requires developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership. The requirements for affordable housing are set out in the affordable housing SPD. This policy, and policy DES5, seeks for a range of housing sizes and tenures to be provided in order to enable more balanced communities, to ensure choice but also to enable people to remain within the communities in which they are a part of.	Inclusion of DES7 Affordable Housing
<b>DES 5</b> - We trust that the policy will be adhered to, instead of allowing a predominance of 4 and 5 bedroom dwellings in much of the Borough.	This comment is noted. Proposed policy DES5 seeks to require a range of housing types and tenures on new developments. The proposed policy approach seeks to meet the need for smaller family housing - including as part of infill developments where large housing normally prevails - and larger units in accessible town centre locations but balances this with flexibility for schemes to respond to site specific viability, practicality and local character issues.	

<p>As the core strategy polices are likely to be out of date on such matters as first time buyers, self build and possibly starter homes, there should be a policy in the DMP which provides some flexibility but indicates the Council's priorities.</p> <p>We note that some authorities are requiring contributions towards affordable housing on developments of less than 10 houses where a case can be made, despite the recent Government victory in the Courts. As much of the new development in the northern part of the Borough is for less than 10 units, we request a policy is included in this section which states that the Council considers it appropriate for affordable housing contributions on all developments, including those of less than 10 units. This should help in the provision of more affordable housing and assist in appeals.</p>	<p>There is currently little national guidance on self and custom build and starter homes. This information is expected soon from the Government, we will incorporate this as far as possible should this be provided prior to examination, however we cannot delay our Local Plan programme to wait for this.</p> <p>In terms of contributions for sites of less than 10 units whilst the Council made a special circumstances argument for the need to continue to require contributions, the Council lost a number of appeals so under the currently adopted planning policy we are unable to require this. However, DES7 has been drafted which again seeks to require a contribution from less than 10 units.</p>	
<p>There should be policies on type of tenure and consideration of accommodation for the elderly.</p>	<p>Policy DES8 covers elderly housing and there is a requirement in some of the site allocations to provide elderly accommodation as part of the development. Policy DES5 also seeks to ensure a good mix of sized dwellings, to provide the choice for those who may wish to downsize and policy DES6 also requires a certain % of dwellings to be "adapatable and accessible" and for "wheelchair users"</p>	<p>No change</p>



<p><b>DES6 – 2a</b> – references Building Regulations for ‘accessible and adaptable’ dwellings (Building Regulation M4(2)) which is only an optional requirement in the Regulations.</p> <p>The Planning Practice Guidance PPG (ID: 56-005-20150327 Paras 5-12) sets out how and when Local Authorities can apply Policies to require higher accessibility standards. The approach undertaken in Policy DES6 2a is overly prescriptive and runs contrary to the advice in the PPG.</p> <p>The Council are requested to consider requiring ‘Visitable’ dwellings under part M rather than ‘Accessible and Adaptable’ as this provides a good standard of access to dwellings and is more achievable for smaller developers. The ‘accessible and adaptable’ standard should be optional.</p>	<p>This comment has been noted. Paragraph 50 of the National Planning Policy Framework says that as part of delivering a wide choice of high quality homes, local planning authorities should seek to address the needs of different groups within their communities, including specifically older people and those with disabilities. The National Planning Practice Guidance (Paragraph 005 Reference ID: 56-005-20150327) includes provisions for local planning authorities to consider requiring enhanced levels of accessibility, adaptability and wheelchair standards in new homes to help address the needs of specific groups.</p> <p>National Planning Practice Guidance (ID56: Paragraph 007) says that in order to demonstrate need for enhanced accessibility standards, local planning authorities should consider the likely future need for housing for older and disabled people, including from housing needs assessments; how needs vary across different tenures; and consideration for the impact on viability of housing development. These factors have been considered and are detailed in the Housing Standards Justification Development Management Plan Evidence Paper. The assessment concluded that the number of residents and households in the borough experiencing mobility challenges is likely to grow over the plan period, driven in part by an ageing population, and as a result there will be an increasing need for accommodation which is accessible and adaptable. The proposed standards in the Regulation 18 Development Management Plan take into consideration the identified need and recognise that some of this need can be delivered through adaptations to existing stock. A number of scenarios were tested, all of which remained below the 0.5% cost impact threshold.</p>	<p>No change</p>
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<p>DES6:2(a) and (b) - These requirements seem very low when we should be planning for life time use and taking into account the increasing number of elderly. Should there be reference to Lifetime Homes standards? Should the policy also refer to mobility access requirements in retail, community and business premises?</p>	<p>This comment has been noted. The 2015 Ministerial Statement said that local planning authorities should not set in their emerging Local Plans any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings - this would include a requirement for life time homes.</p> <p>Paragraph 50 of the National Planning Policy Framework says that as part of delivering a wide choice of high quality homes, local planning authorities should seek to address the needs of different groups in their communities, including specifically older people.</p> <p>Policy DES8 covers elderly housing and there is a requirement in some of the site allocations to provide elderly accommodation as part of the development. Policy DES5 also seeks to ensure a good mix of sized dwellings, to provide the choice for those who may wish to downsize and policy DES6 also requires a certain % of dwellings to be "adapatable and accessible" and for "wheelchair users".</p> <p>Proposed policies DES1 requires all development to be accessible and inclusive for all users, including for people with disabilities or mobility constraints and the parking standards require disabled parking.</p> <p>Building Regulations deal in more detail with access requirements for dwelling and for other uses than dwellings.</p>	<p>No change</p>
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<p><b>DES5/Older people</b> - approach to delivery of specialist housing is of concern as there are no targets for such provision specifically, merely a reliance on larger schemes to provide the necessary levels.</p> <p>The background paper (June 2016) acknowledges that as of 2014, there was a significant shortage of sheltered and extra care housing (combined shortage of 580 spaces against the demand of 2,083 equivalent to almost 28%), with a future demand of approximately 115 units per annum which is equivalent to 25% of the planned supply (paragraph 2.25). Despite this historic under-provision, and the significant future demand predicted the conclusion is to provide no policy setting out targets to ensure any provision of these units other than sheltered housing on sites of 120 to 200, or extra care housing on sites of over 200 (paragraph 2.49). Without positive measures, and clear targets for a rate of provision of this much needed form of accommodation, older people within the Borough will be failed by this council to be provided with any form of housing choice to meet their specific demands. The approach of expecting the market to provide for this sector without any clear targets will only add to the existing problems that we as older residents within the Borough face. The outcome will therefore be residents having to look elsewhere to meet their housing requirements due to lack of realistic alternative to downsize to and find a suitable site that caters for the active older person. This seems contrary to the national requirements of council's ensuring that they meet the housing needs of all residents.</p>	<p>It is accepted that there is a need for elderly accommodation, particularly for Extra Care. However, as set out in the "Development Management Plan evidence paper, Housing for Older People", elderly people accommodation needs are varied (some may stay in their homes and bring in care, some may go live with relatives etc). As such, we are taking a varied approach to facilitating elderly persons accommodation needs through the Local Plan given the range of options to older persons housing needs.</p> <p>Policy DES8 covers elderly persons accommodation, which will support new elderly person provision in appropriate locations and resist the loss of existing. DES6 will require a certain percentage of housing for certain developments to be accessible and adaptable, as well as adaptable for wheelchair users. In addition, there are a number of proposed site allocations in the document which include a requirement for elderly provision. Policy DES5 on housing mix also seek to ensure there are the right types of housing being provided, including smaller units which can encourage downsizing.</p> <p>The aforementioned evidence paper goes on to summarise that "it is not appropriate or necessary to include borough-wide targets for provision of new accommodation" so our approach is not about hitting a numerical target for elderly persons accommodation but rather facilitating a broad range of options.</p> <p>The nature of our borough means that our "larger" allocated sites are still relatively small and it is not considered that this will result in "continual development"</p>	<p>No change</p>
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<p>There is also the concern that on larger sites older residents will be disturbed in later life by continual development as part of the larger sites, which is not desirable for the aspirations of older people.</p>		
<p><b>DES6</b> - object to the proposed requirement for all new accommodation as a minimum to meet the relevant 'nationally described internal space standards for each individual unit'. We consider that the London Housing Design Guide is more relevant and should be applied to town centre sites located in highly sustainable locations (such as First Point, Redhill).</p>	<p>This comment has been noted. Whilst the borough adjoins London to the North, it isn't part of London. Our town centres are not as densely built as London and therefore it is felt that the national standards should apply. However, the following wording has been added to the policy "except where the Council accepts that an exception to this should be made in order to provide an innovative type of affordable housing that does not meet these standards"</p>	<p>No change</p>
<p>DES6:1(c) - This policy should include disturbance from visual intrusion.</p>	<p>This comment is noted. It is addressed through proposed policy DES1.</p>	<p>No change</p>
<p>DES6:1(f) - Where balconies and roof terraces are the only private outdoor amenity space, account should also be taken of noise and overlooking etc.</p>	<p>This comment is noted. It is addressed through proposed policy DES1.</p>	<p>No change</p>
<p>DES6:1(g) - It is unclear how the water efficiency standards will be met.</p>	<p>(DES6:1(g) has been moved to CCF1) This comment has been noted. Reigate &amp; Banstead is within an area of serious water stress and development should plan positively to promote water efficiency. The Water Efficiency Standard proposed is a national standard, national guidance is available - See Planning Practice Guidance Paragraph: 017 Reference ID: 56-017-20150327</p>	<p>No change</p>

<p><b>DES 5</b> - There is concern in places like Banstead that an increase in the number of small units without adequate parking will exacerbate the existing parking problems in the surrounding residential areas.</p>	<p>This comment has been noted. Proposed policy DES5 - DES7 seek to ensure a range of housing types on new developments but balances this with flexibility for schemes to respond to site specific viability, practicality and local character issues.</p> <p>Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No change</p>
<p><b>DES6</b> - water use dealt with under building regs. no need to add more red tape to planning applications along with more costs by dealing twice with the same restriction.</p>	<p>This comment has been noted. Section 10 of the National Planning Policy Framework makes clear that, as part of sustainable development, planning has a role to play in encouraging the prudent use of resources and minimising waste. As part of positive strategies for addressing climate change, local planning authorities are directed to take full account of water supply and demand issues.</p> <p>In order to deliver this, Planning Practice Guidance (ID 56: Paragraph 13/14) includes provisions for local planning authorities to consider imposing a tighter water efficiency requirement (of 110 litres/ person/ day) to new homes to help manage demand. Local authorities should consider existing sources of evidence; consultations with the local water and sewerage company, the Environment Agency and catchment partnerships; and consideration of the impact on viability of</p>	<p>No change</p>

	housing. These factors have been considered and there is felt to be a need to introduce this standard. Details are provided in the Housing Standards Justification Development Management Plan Evidence Paper.	
<b>DES5</b> - Social housing is essential	This comment has been noted. Proposed policy DES7 covers the provision of affordable housing.	No change
<b>DES5</b> - there could be a conflict between 1(b) and, in particular, 1(c).	This comment has been noted. Proposed policy DES5 seeks to achieve a range of housing whilst allowing the flexibility for schemes to respond to site specific viability, practicality and local character issues. Wording has been amended to make this clearer.	DES5 (3) has been amended to read: 2)3) Provision of market housing must meet the following requirements unless it is demonstrated that it is not financially viable or

		technically feasible to do so, or that doing so would have an adverse impact on the character of the surrounding area or it can be clearly demonstrated there is no market demand:
<b>DES5</b> - No social housing. Many people will never be able to afford their own home and market rents are sky high.	This comment has been noted. Providing the right range of homes (market and affordable) helps to create more balanced communities. Affordable housing provision can include shared ownership which helps people to afford a property.	No change
If this means building more council housing, it will ruin the Banstead area and take away its charm.	Affordable housing provision is necessary in order to create balanced communities, prevent social exclusion and to provide households with a greater range of choices to enable them to remain within the communities of which they are a part. The provision of affordable housing is also required by national policy.	No change

<p>The Banstead area already has a good mix of housing size and types, which should be maintained rather than altered.</p>	<p>This comment has been noted. Providing both market and affordable housing helps to create more balanced communities, helps to avoid social exclusion and provides households with a greater range of choices to enable them to remain within the communities of which they are a part. Reigate &amp; Banstead's Strategic Housing Market Assessment identified a need to provide a balance of small to large properties (40:60). This will enable the borough to meet a need for smaller family housing as part of infill developments where larger family housing normally prevails and larger houses in town centres. Proposed policy DES5 does however allow for some flexibility for schemes to respond to local character issues, practicality and site specific viability.</p>	<p>No change</p>
<p>Remove the need for developers to offer affordable housing.</p>	<p>This comment is noted. Affordable housing provision is necessary in order to create balanced communities, prevent social exclusion and to provide households with a greater range of choices to enable them to remain within the communities of which they are a part. The provision of affordable housing is required by national policy where there is a need for it, and affordable housing is an issue in the borough.</p>	<p>No change</p>
<p>Building social housing will reduce the value of existing houses.</p>	<p>This comment is noted. Affordable housing provision is necessary in order to create balanced communities, prevent social exclusion and to provide households with a greater range of choices to enable them to remain within the communities of which they are a part. The provision of affordable housing is required by national policy where there is a need for it, and affordable housing is an issue in the borough.</p>	<p>No change</p>



<p>Further housing in Banstead should be confined to land owned by the borough and county councils.</p>	<p>This comment has been noted. National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. Reigate Borough Council and Surrey County Council do not own enough land to achieve this. We rely on private developers in order to deliver housing.</p>	<p>No change</p>
<p>There needs to be some smaller and low key housing to encourage first time buyers and young families to Banstead to reduce the average age and the strain on the surgery. Younger people currently cannot afford to buy homes in Banstead.</p>	<p>This comment is noted. Proposed policy DES5 seeks a range of housing to be provided, this includes the need for smaller family housing.</p>	<p>No change</p>
<p>When sites are redeveloped in Banstead, there should be a focus on smaller houses, bungalows, maisonettes, and low rise flats - this would provide more dwellings with less of an impact on the character of the town.</p>	<p>This comment has been noted. Proposed policy DES5 seeks to achieve a balance of properties including smaller and larger dwellings. This will help to meet the need for smaller family housing but also some larger family housing in order to create a more balanced community, and in line with our evidence base - the Strategic Housing Market Assessment (available here <a href="http://www.reigate-banstead.gov.uk/info/20088/planning_policy/22/evidence_and_research_for_planning_policies/2">http://www.reigate-banstead.gov.uk/info/20088/planning_policy/22/evidence_and_research_for_planning_policies/2</a>)</p>	<p>No change</p>
<p>Banstead should not have flats with loads more people squashed into the village.</p>	<p>This comment has been noted. Proposed policy DES5 seeks to achieve a range of housing to be provided on sites with the aim of providing a balance of properties including smaller and larger dwellings to create a more balanced community and to provide choice for people in terms of where they would like to live. The policy does however allow flexibility for schemes to respond to site specific viability, practicality and local character issues. DES6 stipulates how housing will be high quality, including minimum space standards in new development.</p>	<p>No change</p>

<p>Mixing 1 and 4 bedroom houses doesn't work, due to different lifestyles.</p>	<p>This comment has been noted. Proposed policy DES5 seeks to achieve a range of housing to be provided on sites with the aim of providing a balance of properties including smaller and larger dwellings to create a more balanced community and to provide choice for people in terms of where they would like to live. The policy does however allow flexibility for schemes to respond to site specific viability, practicality and local character issues.</p>	<p>No change</p>
<p><b>SC2</b> - once again look at the awful new housing estates that have been built.</p>	<p>This comment has been noted. Proposed policy DES1 seeks to ensure new development is of a high quality that makes a positive contribution to the character and appearance of the area. Proposed policy DES5 also seeks to ensure that the housing mix reflects the role and character of the surrounding area. Proposed policy DES6 seeks to ensure that high quality homes are built (for example providing an efficient and convenient layout, providing outdoor amenity space and meeting nationally described internal space standards).</p>	<p>No change</p>
<p><b>Sc2</b> - Yes overall, however don't impose a mix on each development. Achieve the mix across the total programme.</p>	<p>This comment is noted. Proposed policy DES5 seeks a range of housing to be provided on sites but balances this with flexibility for schemes to respond to site specific viability, practicality and local character issues.</p>	<p>No change</p>
<p><b>SC2</b> - as long as they are appropriate to the area</p>	<p>This comment is noted. Proposed policy DES5 seeks a range of housing to be provided on sites but balances this with flexibility for schemes to respond to site specific viability, practicality and local character issues.</p>	<p>No change</p>

<p><b>SC2</b> - The area must develop for the good of the community, and not simply become a retreat for those working in London.</p>	<p>This comment has been noted. In order to create a balanced community, proposed policy DES5 - DES7 seeks for a range of housing types and tenures to be provided. This has been informed by our evidence base - the Strategic Housing Market Assessment (available here <a href="http://www.reigate-banstead.gov.uk/info/20088/planning_policy/22/evidence_and_research_for_planning_policies/2">http://www.reigate-banstead.gov.uk/info/20088/planning_policy/22/evidence_and_research_for_planning_policies/2</a>)</p>	<p>No change</p>
<p>most new housing should take the form of apartments which significantly reduces the area required for a given population and allows the Borough to reach the government imposed housing targets without compromising the green belt</p>	<p>This comment has been noted. Proposed policy DES5 seeks for a range of housing sizes to be provided, it would not be appropriate to restrict housing delivery to only one type of accommodation. The proposed policy approach seeks to meet identified housing needs as evidenced by our evidence base - the Strategic Housing Market Assessment (available here <a href="http://www.reigate-banstead.gov.uk/info/20088/planning_policy/22/evidence_and_research_for_planning_policies/2">http://www.reigate-banstead.gov.uk/info/20088/planning_policy/22/evidence_and_research_for_planning_policies/2</a>). The policy requires new development to not have an adverse impact on the character and role of the surrounding area. However, higher density housing is sought in appropriate areas and best of use land is required in any planning application</p>	<p>No change</p>
<p><b>DES5: 1( b)</b> The size of housing units must also reflect the area in which they are built. Roads with predominately large houses with large gardens should also be protected rather than have a number of smaller units “stuffed” in. Similarly we do not want a 5 bedroom house “stuffed in a row of terraced houses. So the wording needs strengthening and clarifying to be clearer on areas.</p>	<p>This comment is noted. Proposed policy DES5 seeks for a range of housing sizes to be provided but balances this with flexibility for schemes to respond to local character issues - wording has been amended for clarity on this. Some areas are given designations such as Residential Area of Special Character or are designated as Conservation Areas, and other policies in the DMP such as DES2,3 and NHE7 provide further guidance on what can occur within these areas, including in terms of design</p>	<p>Wording has been amended as follows in DES5(3):  Provision of market housing must meet</p>

		the following requirement unless it can be demonstrated that it is not financially viable or technically feasible to do so, or that doing so would have an adverse impact on the character of the surrounding area or it can be clearly demonstrated there is no market demand:
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<p><b>DES5</b> - Only if this does not mean small dwellings to maximise rents or council tax.</p>	<p>This comment has been noted. Proposed policy DES5 seeks for a range of housing to be provided to meet identified housing needs as evidenced by our evidence base - the Strategic Housing Market Assessment (available here <a href="http://www.reigate-banstead.gov.uk/info/20088/planning_policy/22/evidence_and_research_for_planning_policies/2">http://www.reigate-banstead.gov.uk/info/20088/planning_policy/22/evidence_and_research_for_planning_policies/2</a>).</p>	<p>No change</p>
<p><b>DES5</b> - Too many 4/5 bedroom detached houses and/or too many low rent flats/houses both undesirable. We need a mix. Redhill needs pulling up.</p>	<p>This comment is noted. Proposed policy DES5 seeks a range of housing to be provided on sites but balances this with flexibility for schemes to respond to site specific viability, practicality and local character issues.</p>	<p>No change</p>
<p><b>DES5</b> - I believe there may be too much emphasis on low cost housing which may be putting developers off. We need houses and if the supply increases then they will be more affordable but currently development seems to have stalled on some projects.</p>	<p>This comment has been noted. Proposed policy DES5 seeks to achieve a mix of housing types and tenures in order to create more balanced communities. This also helps to avoid social exclusion and provides households with a greater range of choices to enable people to remain within the communities of which they are a part. Where provisions for affordable housing can be demonstrated to not be viable on a development, a lesser provision or no provision will be considered.</p>	<p>No change</p>
<p><b>DES5</b> - The priority is a lack of affordable housing, both of smaller starter homes/flats and family-sized houses. The need for housing that young people can afford in the Borough on typical incomes is desperate.</p>	<p>This comment has been noted. The affordability of housing within the borough is recognised as a key concern of local residents. Proposed policy DES5 seeks for a range of housing types to be provided. Proposed policy DES7 requires developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership. The requirements for affordable housing are set out in the affordable housing SPD</p>	<p>No change</p>
<p><b>DES5</b> - Take the lead and build affordable housing with</p>	<p>This comment has been noted.</p>	<p>No change</p>

paddocks and stables near to bridle paths		
<b>DES5</b> - We need affordable housing so people can work locally and therefore have a sense of community.	This comment is noted. Proposed policy DES5 seeks to achieve a mix of housing tenures and types in order to create a more balanced community. The affordability of housing within the borough is recognised as a key concern of local residents. Proposed policy DES7 requires developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership. The requirements for affordable housing are set out in the affordable housing SPD	No change
<b>DES5</b> - However, I do not want to see all social housing in an area where we already have so much and too many lazy layabouts. suitable property that attracts the right type of resident - The social housing is housing 98% of a population who don't work and don't care about their houses or gardens. No more please in South Reigate	This comment is noted. Proposed policy DES5 seeks to ensure a range of housing types and tenures. It also ensures flexibility in terms of local conditions allowing schemes to respond to site specific viability, practicality and local character issues.	No change
<b>DES5</b> - As long as the housing is genuinely affordable, which is unlikely	This comment is noted. The affordability of housing within the borough is recognised as a key concern of local residents. Proposed policy DES7 requires developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership. The requirements for affordable housing are set out in the affordable housing SPD	No change
<b>DES5</b> - More 1 and 2 bed houses for first time buyers should be a prerequisite	This comment has been noted. The Strategic Housing Market Assessment identified the need for 40% smaller households (1 & 2 bed) and 60% of larger houses to be provided. Proposed policy DES5 seeks to ensure that a mix of housing types and tenures are provided.	No change

<p><b>DES5</b> - I think it is very important that more smaller, affordable property be provided. It seems only big, expensive, 3+ bedroom houses are being built!</p>	<p>This comment has been noted. The Strategic Housing Market Assessment identified the need for 40% smaller households (1 &amp; 2 bed) and 60% of larger houses to be provided. Proposed policy DES5 seeks to ensure that a mix of housing types and tenures are provided.</p>	<p>No change</p>
<p><b>DES6</b> - All new housing should be of good habitable quality.</p>	<p>This comment has been noted. This is what the policies in the DMP seek to achieve</p>	<p>No change</p>
<p>No point in having a booming local economy if people are unable to buy properties in the area and cannot get big enough deposits together, even by utilising the Government Help to Buy initiatives.</p>	<p>This comment is noted. The affordability of housing within the borough is recognised as a key concern of local residents. Proposed policy DES7 requires developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership.</p>	<p>No change</p>
<p>Building houses on the proposed sites will do nothing towards relieving the housing shortage. The price of property in this area is generally quite beyond the reach of young people just trying to get onto the housing ladder.</p>	<p>This comment is noted. The affordability of housing within the borough is recognised as a key concern of local residents. Proposed policy DES7 requires developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership.</p>	<p>No change</p>
<p>Horley Acres must be considered a massive failure. Houses packed in, low quality, postage stamp gardens, roads are a car park and little regard to the properties surrounding these estates</p>	<p>Comment has been noted. Proposed policy DES5 seeks to ensure that new residential development provides homes of an appropriate type, size and tenure to meet the needs of the local community whilst reflecting the role and character of the surrounding area. Proposed policy DES6 seeks to ensure new residential developments provide high quality accommodation. This includes making provision for private outdoor amenity space. Proposed policy TAP1 seeks to ensure adequate car</p>	<p>No change</p>

	parking for new housing developments.	
<b>DES6</b> - I 100 believe modern developers are incapable of building any houses of appropriate size nowadays. They merely build to extract maximum financial gain. Minimum room size and living area size must be mandated, and the same for the street scene too. The modern estates are far too crammed in.	This comment has been noted. Proposed policy DES6 seeks to ensure new homes are built of a high quality, including ensuring that new homes are built to nationally described internal space standards and provision for outdoor amenity space.	No change
<b>DES6</b> - The Council must look unfavourably on applications which seek to build multiple houses on single plots, as average room sizes are often built far too small.	This comment has been noted. Proposed policy DES6 seeks to ensure new homes are built of a high quality, including ensuring that new homes are built to nationally described internal space standards and provision for outdoor amenity space.	No change
In addition to size of unit, there should be policies on type of tenure and consideration of accommodation for the elderly.	This comment has been noted. DES7 Affordable Housing and DES8 Specialist Accommodation cover tenure and consideration of accommodation for the elderly	No change
More housing is not needed in Banstead.	This comment has been noted. The adopted Core Strategy identified a need to deliver 180 dwellings within Banstead over the course of the plan period (between 2012 and 2027).	No change



<p>Look at the renovation of old places instead of building new ones.</p>	<p>This comment has been noted. Paragraph 47 of the National Planning Policy Framework requires local planning authorities to maintain a five year housing supply. As part of this we look for opportunities to accommodate this need within urban areas, however we cannot force people to develop/renovate.</p>	<p>No change</p>
<p>DES6 - [in relation to evidence base] In terms of the necessity of adopting the optional standard, we note that paragraph 2.10 concludes that the majority of new homes in the borough meet the national standard. Clearly then there is no need for the nationally described space standard in Reigate &amp; Banstead.</p>	<p>This comment is noted. However whilst the majority of the new homes in the Borough meet the nationally prescribed space standards, a proportion of small properties do not. As outlined in paragraph 2.11 of the Housing Standards Justification Development Management Evidence Paper, the introduction of the standard is considered to be justified to address the inequality and to ensure that moving forward all new units provide suitable and adequate space for day-to-day living, irrespective of type and number of bedrooms.</p>	<p>No change</p>
<p><b>DES6</b> - All new residential developments (including conversions) should provide high quality, adaptable accommodation, and provide good living conditions for future occupants: 1) All new accommodation must: a) As a minimum meet the relevant nationally described internal space standard for each individual unit b) Be arranged to ensure primary habitable rooms have an acceptable outlook and where possible receive direct sunlight c) Be designed to minimise the disturbance to occupants from other land uses nearby and/or other sources of noise and pollution (see also DES8) d) Provide a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms e) Incorporate sufficient space for storage, clothes drying and the provision of waste and recycling bins in the home f) Make provision</p>	<p>This comment has been noted. Any current planning application would have been subject to current planning policies in the Local Plan 2005 so would not have been judged against proposed planning policies, including DES6.</p>	<p>No change</p>

<p>for private outdoor amenity space, including balconies and roof terraces, accessible to each dwelling unit and, where appropriate, communal outdoor space The housing development on the Albert Road North Industrial Estate has not fulfilled the above points in particular the apartments. 1 (b) The backs of the apartments face a high brick wall and the light available to the front of the apartments. The outlook for the primary habitable rooms of these apartments is industrial buildings. 1 (f) Private and communal outdoor space is inadequate is severely limited by the adjacent town houses (part of the development).</p>		
<p><b>DES5</b> - seeks to have a level of control over the size of dwellings provided. This is really a matter for the market and area to dictate. it is not appropriate to establish restrictive policies that demand a minimum percentage provision. Not least it is likely that need will change over the course of the plan. Otherwise this could have a negative impact on the viability and deliverability of housing developments.</p> <p>needs to have regard to the character of existing areas and the demographic that they serve, this may also mean that certain sizes of dwellings are not appropriate.</p> <p>They will know the area in which they are developing and should be trusted to provide an appropriate mix and size of dwellings. Therefore considered more appropriate for policy DES 5 to refer to latest evidence than percentage restrictions. encourage the Council to produce an updated SHMA which takes into account</p>	<p>This comment is noted. It is felt that there is sufficient flexibility within proposed policy DES5. Proposed policy DES5 directs developers to the SHMA but also says that in order to provide balanced communities some % is required to provide smaller/larger properties to ensure balanced communities, the rest the developer should provide in accordance with the SHMA/market signals. Whilst it seeks to ensure a range of housing types it does balance this with flexibility for schemes to respond to site specific viability, local character and practicality considerations. The policy allows for deviance from these % if it can be demonstrated that it is not financially viable or technically feasible to do so.</p> <p>The SHMA is not intended to be updated to inform the DMP.</p>	<p>No change</p>

<p>the most recent projections to ensure that the DMP document is supported by a robust and up-to date evidence base.</p>		
<p><b>DES5</b> - we question whether the policy (criterion 1b) should be so inflexible.</p> <p>In this scenario, it would appear that criterion 1) a) could potentially conflict with criterion 1) b). 3.3 We therefore recommend that the policy is amended to state that the proposed housing mix (in new developments) “should aim to:” and that criterion 1) b) should be deleted.</p>	<p>(DES5 now DES4) This comment is noted. It is felt that there is sufficient flexibility within the policy. It directs developers to the SHMA but also says that in order to provide balanced communities some % is required to provide smaller/ larger properties to ensure balanced communities, the rest the developer should provide in accordance with the SHMA/market signals. Whilst it seeks to ensure a range of housing types it does balance this with flexibility for schemes to respond to site specific viability, local character and practicality considerations. The policy allows for deviance from these % if it can be demonstrated that it is not financially viable or technically feasible to do so. The wording has been updated to remove any conflict between criterion 1a) and 1b)</p>	<p>Policy has been updated for clarity</p>
<p><b>DES5</b> - we think Part 1(b) is too restrictive and will lead to nonsensical planning. The word ‘appropriate’ in the preamble is sufficient without the need to lay down an inflexible formula</p>	<p>This comment is noted. It is felt that it is appropriate for percentages to be provided in order to ensure a range of housing is provided on site. The policy seeks to meet the need for smaller family housing - including as part of infill developments where large housing normally prevails - and larger units in accessible town centre locations but balances this with flexibility for schemes to respond to site specific viability, practicality and local character issues.</p>	<p>No change</p>

<p><b>DES5</b> - does not accord with the requirements of the NPPF (para 47) in terms of referring specifically to 'objectively assessed needs' in relation to the Council's Strategic Housing Market Assessment. it does not state how 'objectively assessed needs' identified by the Council's Strategic Housing Market Assessment would be served, and thus falls short of paragraph 47 of the National Planning Policy Framework.</p> <p>Criterion (c) and the policy is inflexible in terms of making efficient use of land, and no specific reference is made to how it relates to other policies in this objective.</p>	<p>This comment is noted. (DES5 is now DES4). Reigate &amp; Banstead Borough Council have a post-NPPF adopted Core Strategy with an adopted local housing target - reflecting constraints within the borough - of 460 net dwellings per annum. The Council's housing delivery monitor identifies that we have over the requisite 5 years housing supply (see <a href="http://www.reigate-banstead.gov.uk/info/20280/plan_monitoring/31/housing_delivery_monitors">http://www.reigate-banstead.gov.uk/info/20280/plan_monitoring/31/housing_delivery_monitors</a>) and the sites identified in the DMP will help to deliver the necessary housing required over the plan period (up to 2027). Policies DES4 – DES7 seek to support housing for different groups such as the elderly, disabled, people who reside in caravans and affordable housing.</p> <p>Policy DES4 seeks to ensure a range of housing types and tenures but balances this with flexibility for schemes to respond to site specific viability, practicality and the character of the local area.</p> <p>It is unclear how criterion (c) and the policy is inflexible in terms of making efficient use of land. All policies must be read alongside each other and seek to strike a balance between enabling growth whilst ensuring it is sustainable and high quality.</p>	<p>No change</p>
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<p><b>DES5</b> requires 10% of market housing to comprise either 1 or two bedroom units on sites up to 25 units. This is not appropriate on all sites as the provision needs to have regard to the character of development in the locality. Larger sites have the potential to incorporate smaller units without detriment to the wider character, which needs to be maintained in accordance with policies DES1 and DES2. It is considered that the 10% requirement should only apply to sites of 10 dwellings or more. Clearly some developments of less than 10 houses within or close to centres will seek to deliver predominantly smaller units with the overall provision across the Borough being in excess of 10% in any event as sought by the policy.</p>	<p>This comment is noted. It is felt that there is sufficient flexibility within proposed policy DES5. Proposed policy DES5 directs developers to the SHMA but also says that in order to provide balanced communities some % is required to provide smaller/larger properties to ensure balanced communities, the rest the developer should provide in accordance with the SHMA/market signals. The policy has been updated to make it clearer about % requirement for town centres and outside town centre.</p> <p>Whilst it seeks to ensure a range of housing types it does balance this with flexibility for schemes to respond to site specific viability, local character and practicality considerations. The policy allows for deviance from these % if it can be demonstrated that it is not financially viable or technically feasible to do so.</p>	No change
<p>As much of the new development in the northern part of the borough is for less than 10 units, there should be a policy which states that the Council considers it appropriate for affordable housing contributions on all developments, including those of less than 10 units. This should help in the provision of more affordable housing and assist in appeals.</p>	<p>There is currently little national guidance on self and custom build and starter homes. This information is expected soon from the Government, we will incorporate this as far as possible should this be provided prior to examination, however we cannot delay our Local Plan programme to wait for this.</p> <p>In terms of contributions for sites of less than 10 units whilst the Council made a special circumstances argument for the need to continue to require contributions, the Council lost a number of appeals so under the currently adopted planning policy we are unable to require this. However, DES7 has been drafted which again seeks to require a contribution from less than 10 units.</p>	No change

<p>If people want to buy it then it will be built, we don't need to regulate this</p>	<p>This comment has been noted. The affordability of housing within the borough is recognised as a key issue in the borough, many people cannot afford to buy a home and rents can be very high in the Borough. As such, in line with national policy, we can require developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership as per proposed policy DES7. The requirements for affordable housing are set out in the affordable housing SPD. This policy, and policy DES5, seeks for a range of housing sizes and tenures to be provided in order to enable more balanced communities, to ensure choice but also to enable people to remain within the communities in which they are a part of.</p>	<p>No change</p>
<p>While a laudable goal, building more housing may not be the answer as this seems to be using up green sites and adding to a stressed infrastructure.</p>	<p>This comment is noted. National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered.</p> <p>The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites.</p> <p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>

<p>Housing is needed, but not as the expense of amenities like the Surrey Choices Colebrook Centre.</p>	<p>The actual delivery of adult social care is provided by Surrey County Council and we cannot require them to provide this service in Redhill town centre. However, we have passed on comments relating to the desire for this to continue to Surrey County Council. With regard to the DMP we have sought to facilitate this continued service and the site allocation for Colebrook includes a requirement for provision of space for community uses, potentially including adult social care. Where other site allocations include amenities/community facilities we require these to be retained/replaced</p>	<p>No change</p>
<p>There should be smaller scattered developments throughout Banstead village.</p>	<p>This comment has been noted. Reigate &amp; Banstead Borough Council's adopted Core Strategy has a housing target of 460 net dwellings per annum and requires 180 new dwellings to be delivered in Banstead over the plan period. It is intended that the sites in the Development Management Plan will best meet this need and provide wider benefits to the town centre (such as improved community facilities on the Horseshoe). There are no Sustainable Urban Extensions proposed for this area.</p>	<p>No change</p>
<p><b>DES5</b> - There are substantial problems here. The extracts from the NPPF refer to “wider opportunities for home ownership(sic)” and in the same sentence the words sustainable, inclusive and mixed are used. This fails to recognize that there are substantial parts of the borough community that simply cannot afford to buy houses here. Even the term “affordable” (for purchase) is inappropriately defined and would not meet the housing needs of the lower paid. Reference must be made explicitly to the need for rented housing not just privately let but municipal housing perhaps by</p>	<p>This comment is noted. The affordability of housing within the borough is recognised as a key concern of local residents. Proposed policy DES7 requires developers to contribute to the supply of affordable housing, including for affordable rent and for options such as shared ownership. The requirements for affordable housing are set out in the affordable housing SPD. This policy, and policy DES5, seeks for a range of housing sizes and tenures to be provided in order to enable more balanced communities, to ensure choice but also to enable people to remain within the communities in which they are a part of.</p>	<p>No change</p>

trusts. Only by these means could sustainability and inclusivity be truly achieved.

In terms of mix and inclusivity this too needs clearer definition. These are terms that are key to achieving social mixing. To have developments with pockets of different types of housing will not achieve these aims. The policy must refer to mechanisms that achieve these aims, it is not sufficient to simply specify fractions or proportions of housing types. All of this requires very careful consideration that is not manifest here. We believe that this section is weak. It must address the needs of people who are important to the community who could only afford to rent or to buy low cost good quality homes. This has important implications in dealing with builders, the borough has important obligations to its community and should impose stringent requirements on developers to ensure that suitable housing is delivered.

DES7 has been drafted to provide details on requirements on affordable housing which developers have to adhere to. Planning permission will only be granted for development if the scheme includes the right amount of affordable housing in line with policy, or if the developer can demonstrate that a scheme would not be viable should they have to provide affordable housing. If this is the case, we would still seek a lesser contribution on site or a financial contribution. Where a lesser/no contribution is allowed due to viability issues, we can include a requirement in the conditions of a planning permission that stipulates should the development make more profit than envisaged the Council would be able to "claw back" some of that money to go towards affordable housing.

The affordable housing SPD provides further details on how development should be designed to achieve inclusivity.

The National Planning Policy Framework Annex 2 defines affordable provision. This is the definition (and requirements) which Reigate & Banstead Borough Council has to use.



<p>It is unclear whether existing social housing unit mix in the local area, is taken into account when deciding mix for new developments. For example, Redhill (based on 2011 census data) has c21% social housing letting, vs c6% in Reigate, c11% Horley and c8% in other areas. Consequently, it would make sense that subsequent developments in Reigate take a greater proportion of social housing to those in Redhill, to help re-address the mix and make it comparable across the borough.</p>	<p>This comment has been noted. Proposed policy DES5 and DES7 requires all developments to provide a mix of housing types and tenures, but provides some flexibility with regards to local character issues. It is not felt appropriate to require all developments within Reigate to offer a higher proportion of affordable housing than Redhill - there is a need for a mix of housing types and tenures in both towns. The affordable housing requirements have been generated taking account of viability.</p>	<p>No change</p>
<p><b>DES5</b> - price is £426,207 and the mean annual earnings £32,935, a ratio of 12.9:1. The income required for a mortgage here is £97,419. This is a serious crisis and the DMP must address it.</p> <p>The Borough is not delivering anywhere close to its plan requirement for affordable housing. In 2015/16 just 15.2% of the total housing delivered were classified as affordable, and only 8.5% were properties available for rent at affordable rents. An updated Affordable Housing Supplementary Planning Document (SPD) is required to address this shortfall both against the target, and against local need. These should also be subject to consultation before the Regulation 19 consultation takes place as the policy approach taken for affordable housing will impact the viability and deliverability of some sites. Consultation should include all registered social landlords operating in Reigate and Banstead and the campaign group Homes for Surrey.</p>	<p>This comment has been noted. In terms of the delivery of affordable housing, the adopted Core Strategy requires Reigate &amp; Banstead to deliver 1,500 affordable dwellings over the plan period (2012-2027), with a target of 100 per year. The latest housing delivery monitor identifies that as of 31 March 2017 475 affordable dwellings have been completed. In 2015/16 89 affordable units were completed, this is below the 100 annual target, but the previous year 129 units were completed. The number will fluctuate depending upon which developments are coming forward. Policy DES7 has been drafted to update the Core Strategy requirements on affordable housing, including a requirement for smaller developments to provide a financial contribution to affordable housing.</p> <p>An Affordable Housing SPD have been noted. Should such a document be produced all those stakeholders would be consulted.</p> <p>Comments regarding affordable housing on Council owned land have been noted, in line with any other developer/</p>	<p>No change</p>

<p>All residential development on publicly-owned land should provide at least the minimum amount of affordable housing designated in the Council's SPD.</p>	<p>applicant, the Council is required to provide affordable housing in line with policy/SPD</p> <p>Proposed policy DES5 seeks to ensure that a range of housing types and tenures is provided. It seeks to ensure that new development meets the needs of the Affordable Housing SPD.</p>	
<p><b>SC2</b> - Impossible to disagree with but, again, the term 'good' is poorly chosen.</p>	<p>This comment has been noted. SC2 is an objective, policies DES5 - DES8 provide the detail of how this will be delivered</p>	<p>No change</p>
<p><b>SC2</b> - If new housing developments are anything like the other new developments these are not the type of properties local people want there is a lack of parking provision and gardens - beginning to feel like a London development</p>	<p>Comment has been noted. Proposed policy DES6 seeks to ensure new residential developments provide high quality accommodation for future occupants. This includes making provision for outdoor amenity space.</p> <p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No change</p>

<p><b>DES6</b> -‘Quality’ must encompass design for future climate – mitigating greenhouse gas emissions and resource use, as well as adapting to future changes. It must also relate to housing need – which is for more affordable homes. We therefore suggest this policy be renamed: ‘Delivering high quality, sustainable and affordable homes’.</p> <p>The provision of outdoor amenity space set out in (f) could be aided by undercroft parking, and increased cycle parking as set out below.</p>	<p>This comment has been noted. Proposed policies CCF1 and CCF2 seek to encourage new development to incorporate passive and active energy measures, climate change resilience and renewable energy technologies and direct areas away from areas at risk of flooding.</p> <p>In terms of affordable housing need, Policy DES7 has been drafted dealing with affordable housing provision and the Council has an adopted Core Strategy which has an affordable housing need of 100 dwellings per annum.</p> <p>A parking SPD will be prepared to support the DMP which will cover parking design in more detail</p>	No change
<p>Increase density of new build / conversions / redevelopment close to existing transport nodes.</p>	<p>This comment has been noted. The Housing White paper (2017) says that Councils and developers will be expected to use land more efficiently by building higher where there is a shortage of land and in locations well served by public transport such as train stations.</p> <p>The Core Strategy CS10 requires efficient use of land.</p>	No change
<p><b>DES6</b> - Part 2 goes on to require us to meet bldg. control. There are certain good reasons that access cannot meet the building regs but that is covered by very strict req under bldg. regs. By applying additional rules you are subverting these rules and reducing flexibility where central Govt has seen it necessary. Don't stray beyond planning</p>	<p>Paragraph 50 of the National Planning Policy Framework makes clear that as part of delivering a wide choice of high quality homes, local planning authorities should seek to address the needs of different groups in their communities, including specifically older people and those with disabilities. Basic accessibility requirements are enshrined in Building Regulations (Part M 2015). However, the Planning Practice Guidance includes provisions for local planning authorities to consider requiring enhanced levels of accessibility, adaptability and wheelchair standards in new homes to help address the</p>	No change

	<p>needs of specific groups.</p> <p>To demonstrate need for enhanced accessibility standards, the Planning Practice Guidance (ID56: Paragraph 007) directs local planning authorities to consider the likely future need for housing for older and disabled people, including from housing needs assessments; how needs vary across different tenures; and consideration of the impact on viability of housing development. This has been considered and is detailed in the Development Management Plan Housing Standards Justification Evidence Paper. It concluded that the number of residents and households in the Borough likely to experience mobility challenges is likely to grow over the plan period, driven in part by an ageing population, and as a result there will be an increasing need for accommodation which is accessible and adaptable. The proposed standards reflect the need to balance need, achievability and viability. Scenarios have been tested, and in all scenarios, the cost impact was found to remain below the 0.5% threshold.</p>	
<p><b>DES6</b> - With regard to 2a and the term “accessible and adaptable dwellings”, we assume that this means that they are technically capable of adaptation for the physically disabled, including wheel chair users. In 2b, presumably the phrase “wheel chair user dwellings” means that the adaptation had already been made.</p>	<p>(Now in DES7) This comment has been noted. Accessible and adaptable dwellings and wheel chair user dwellings are references taken from the building regulation Part M</p>	<p>No change</p>
<p>Planning applications which seek the redevelopment of Brownfield and previously developed sites should be viewed favourably where they would have a lesser impact in terms of issues such as noise and disturbance than the existing or previous use of the site.</p> <p>Summary recommendation: The wording of paragraph 1c should be enhanced to include that, ‘where</p>	<p>This comment has been noted. Whilst the Council recognises the importance for brownfield development, there is a need for all homes in the borough to be of a high quality. When a planning application is assessed by the Development Management team they assess all elements of the application i.e. noise, access, movement generated and will give appropriate weight to each component. If the development is an improvement on the existing then this will be reflected in the</p>	<p>No change</p>

<p>developments relate to the re-use or redevelopment of previously developed land, consideration will be given to the level of noise and disturbance associated of the existing or previous land use. Development schemes which improve upon the existing levels of noise and disturbance to surrounding uses will be viewed favourably, subject to meeting the criteria in policies DES1, DES8 and TAP1'.</p>	<p>weight that is given to it, so it is not felt it is necessary to include this when it is covered in practice.</p>	
<p><b>DES5</b> - I object to any mix of social and private housing in a close proximity due to social tensions and incompatible housing requirements</p>	<p>This comment has been noted. (DES5 now DES4). This policy requires a mix of tenures in order to provide more balanced communities, help avoid areas of social exclusion and provide households with a greater range of choices to enable people to remain within the communities of which they are a part.</p>	<p>No change</p>
<p><b>SC2</b> - Affordable housing provided on The Acres and Meath Green developments already provides for this. Why does RBBC seek to merge Horley with Gatwick and deplete the green space surrounding the town that attracts house buyers and new residents to the area?</p>	<p>Comment has been noted. Reigate &amp; Banstead Borough Council has an adopted Core Strategy with a housing target of 460 net dwellings per annum. The Core Strategy recognises that in order to deliver this housing target there may be the need to deliver up to 200 new homes on land that is currently designated as the Rural Surrounds of Horley. The Council has undertaken further work (Sustainable Urban Extensions Technical Reports 1 &amp; 2) to identify possible Sustainable Urban Extensions within this area and is proposing three sites within the Rural surrounds of Horley for market and affordable housing.</p> <p>The Council does not seek to merge Horley with Gatwick and recognises the importance of the Rural Surrounds of Horley. The Council are proposing that parts of the Rural surrounds of Horley are put into the Green Belt for additional protection from</p>	<p>No change</p>

	any further development.	
Identify sites for development in partnership with a compressive public transport / private travel plan.	This comment has been noted. In line with both paragraph 36 of the National Planning Policy Framework and Policy CS17 of the Core Strategy, proposed policy TAP1 says that for developments which are likely to generate significant amounts of movement, a travel plan will be required. In addition, Reigate & Banstead Borough Council have worked with Surrey County Council Transport Planners in order to understand the potential impact of all the proposals within the document. The findings are detailed in the Transport Assessment available on the Council's website. The Infrastructure Delivery Plan also sets out details on other infrastrucutre such as school and utilities etc. This has enabled specific requirements to be attached to proposed site allocations to ensure impacts are mitigated.	No change
<b>DES5</b> - Agree there needs to be a mix of housing, understand keeping low cost in one area does create a ghetto. But be practical, does not need to be so many flats in Walton and Tadworth, best suited in Epsom and Reigate where near to a town centre and better transport links	This comment has been noted. (Policy DES5 now DES4) seeks to achieve a mix of properties but recognises that schemes need to respond to the local character of the area. This policy intends to deliver smaller family homes in areas which typically have larger housing, such as Tadworth and Walton, in order to meet the needs of households who wish to remain within their communities but for example may wish to downsize.	No change
<b>DES5</b> - We desperately need more affordable family housing - to include garden space / washing drying space and parking. Room sizes should allow space to move once required furniture is in situ - not 'smaller designer' furniture - but furniture to suit a family ... play space for children - both inside & out. Obviously local	This comment is noted. Policy DES5 (now DES4) seeks to ensure a range of housing types and tenures is provided on new developments. The affordability of housing is recognised as a key concern of local residents. Proposed policy DES7 covers the requirements for affordable housing from developments.	No change

<p>residents shouldn't be impeded upon too much - but more affordable family housing is desperate</p>	<p>Policy DES5 in particular seeks to ensure that housing meets the relevant nationally described internal space standards, that it provides a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms, that it incorporates sufficient space for storage, clothes drying and the provision of waste and recycling bins in the home and it makes adequate provision for private outdoor amenity space, including balconies and roof terraces, accessible to each dwelling unit and, where appropriate, and/or communal outdoor space.</p>	
<p>In Banstead, housing should only be built on brownfield land outside of the centre.</p>	<p>This comment has been noted. The adopted Core Strategy identified a need to deliver 180 dwellings within Banstead Village centre over the course of the plan period. It is felt that there are opportunities to deliver these dwellings within the town centre on a number of sites including the Horseshoe to accord with the Core Strategy. These are felt to be sustainable locations for new development.</p> <p>The National Planning Policy Framework promotes the use of brownfield land, should these sites be promoted or brought forward for housing - and there are no other concerns - then planning permission will be granted for these sites.</p>	<p>No change</p>

<p><b>DES5</b> - Stop building flats. we do not have the capacity or infrastructure to support the number of families who are moving into flats to get into the area. more large block of flat will inevitable impact of this area in a negative way. Overpriced cupboard sized flats are not needed.</p>	<p>This comment has been noted. The Strategic Housing Market Assessment, based on need and demand, identified a need for both small and large properties within the borough. Policy DES5 (now DES4) seeks to ensure that a range of housing types and tenures are provided on new developments. This will help to provide a greater range of choices for example to people wishing to remain within the communities of which they are a part.</p> <p>The affordability of housing is recognised as a key concern of local residents. Policy DES7 covers the requirements for affordable housing from developments. Policy DES5 in particular seeks to ensure that housing meets the relevant nationally described internal space standards, that it provides a convenient and efficient layout, including sufficient circulation space, that it incorporates sufficient space for storage, clothes drying and the provision of waste and recycling bins in the home and it makes adequate provision for private outdoor amenity space.</p> <p>Reigate &amp; Banstead Borough Council have worked with Surrey County Council Transport Planners in order to understand the potential impact of all the proposals within the document. The findings are detailed in the Transport Assessment available on the Council's website. The Infrastructure Delivery Plan also sets out details on other infrastrucutre such as school and utilities etc. This has enabled specific requirements to be attached to proposed site allocations to ensure impacts are mitigated.</p>	<p>No change</p>
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<p><b>DES5</b> - Why don't you state you are only providing 30% of homes to the thousands on the housing waiting lists in this area.</p>	<p>This comment has been noted. 30% is clearly stated in the adopted Core Strategy CS15 on affordable housing. Policy DES7 updates this policy and sets out what would be required from developers in terms of affordable housing. 30% is the level that was demonstrated to be viable across most value areas - more information on this can be found in the Inspectors Report on the Core Strategy - which can be found here <a href="http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/24/core_strategy">http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/24/core_strategy</a>. 35% is sought on allocated greenfield urban extension sites.</p> <p>Proposed policy DES5 seeks to ensure a range of housing types and tenures on new developments.</p> <p>In terms of the delivery of affordable housing, the adopted Core Strategy requires Reigate &amp; Banstead to deliver 1,500 affordable dwellings over the plan period (2012-2027), with a target of 100 per year. The latest housing delivery monitor identifies that as of 31 March 2017 475 affordable dwellings have been completed. In 2015/16 89 affordable units were completed, this is below the 100 annual target, but the previous year 129 units were completed. The number will fluctuate depending upon which developments are coming forward. Policy DES7 has been drafted to update the Core Strategy requirements on affordable housing, including a requirement for smaller developments to provide a financial contribution to affordable housing.</p>	<p>No change</p>
<p><b>SC2</b> - Horley is not the area for 4/5 bed housing, we need homes for workers, low/medium cost. More homes means more call for schools, doctors, etc., they have got to be able to afford to live locally.</p>	<p>This comment has been noted. Proposed policy DES5 seeks to ensure an appropriate mix of housing types and tenures. The proposed policy allows for some flexibility with regards to local character. DES7 sets out the requirement for affordable</p>	<p>No change</p>

	<p>provision in new developments.</p> <p>Reigate &amp; Banstead Borough Council adopted its Community Infrastructure Levy on 1 April 2016 - this is a charge that local authorities can set on new development in order to raise funds to help fund the infrastructure, facilities and services - such as schools or transport improvements - which are needed to support new homes and businesses in the area.</p> <p>Reigate &amp; Banstead Borough Council have worked with Surrey County Council Transport Planners in order to understand the potential impact of all the proposals within the document. The findings are detailed in the Transport Assessment available on the Council's website. The Infrastructure Delivery Plan also sets out details on other infrastructure such as school and utilities etc. which could arise from the growth anticipated in the Core Strategy and Development Management Plan, which has been generated from discussions with service providers.</p>	
<p><b>SC2</b> - It needs to be wider than this narrow approach. We should be building communities, not houses. There's a load of infrastructure that needs to be delivered alongside housing. Schools, medical, libraries, roads, public transport, utilities, broadband, public services. You need to ensure that developers are contributing appropriately to that, at the marginal costs to add new capacity.</p>	<p>This comment has been noted. The DMP needs to be read as a whole, and alongside the adopted Core Strategy to get a full picture of the proposed approach.</p> <p>Reigate &amp; Banstead Borough Council adopted its Community Infrastructure Levy on 1 April 2016 - this is a charge that local authorities can set on new development in order to raise funds to help fund the infrastructure, facilities and services - such as schools or transport improvements - which are needed to support new homes and businesses in the area.</p> <p>Proposed policy DES5 seeks to ensure an appropriate mix of housing types and tenures in order to build communities.</p>	<p>No change</p>

	<p>Reigate &amp; Banstead Borough Council have worked with Surrey County Council Transport Planners in order to understand the potential impact of all the proposals within the document. The findings are detailed in the Transport Assessment available on the Council's website. The Infrastructure Delivery Plan also sets out details on other infrastructure such as school and utilities etc. which could arise from the growth anticipated in the Core Strategy and Development Management Plan, which has been generated from discussions with service providers.</p>	
<p>Housing development should be employment led (unlike Watercolour and Park 25).</p>	<p>This comment has been noted. Reigate &amp; Banstead Borough Council have an adopted post-NPPF Core Strategy which requires the borough to deliver 460 dwellings per annum. Alongside this we have undertaken assessment of employment and retail needs and these are also incorporated into the plan.</p>	<p>No change</p>
<p><b>DES5</b> - This is imperative, the commercial rewards however for house builders remains at the top end of the market in Reigate, I am concerned at the lack of affordable housing with appropriate services in place.</p>	<p>This comment has been noted. DES7 has been drafted to provide details on requirements on affordable housing which developers have to adhere to. Planning permission will only be granted for development if the scheme includes the right amount of affordable housing in line with policy, or if the developer can demonstrate that a scheme would not be viable should they have to provide affordable housing. If this is the case, we would still seek a lesser contribution on site or a financial contribution. Where a lesser/no contribution is allowed due to viability issues, we can include a requirement in the conditions of a planning permission that stipulates should the development make more profit than envisaged the Council would be able to "claw back" some of that money to go towards affordable housing.</p> <p>Reigate &amp; Banstead have worked with infrastructure providers</p>	<p>No change</p>

	<p>to understand the infrastructure requirements of the proposed development in the Development Management Plan. These are detailed in the Infrastructure Delivery Plan available on the Council's website. The Council has adopted a Community Infrastructure Levy for new residential and convenience retail, this will help to fund new infrastructure requirements.</p>	
<p>The Council acknowledge that there is an acute need to supply more affordable housing. The simple fact is that there are currently in excess of 900 households on the Councils housing waiting list and that this is likely to increase for the foreseeable future. The Council published in August 2016 a position statement with regard to the provision of affordable housing. It is important to note that there has been a failure to provide affordable housing on 6 out of 7 major schemes in the Borough due to viability issues. There is both a Borough wide and local need for affordable housing.</p>	<p>This comment has been noted. The affordability of housing within the borough is recognised as a key concern of local residents. DES7 sets out what would be required from developers in terms of affordable housing and includes a requirement for smaller developments to provide a financial contribution to affordable housing.</p> <p>Planning permission will only be granted for development if the scheme includes the right amount of affordable housing in line with policy, or if the developer can demonstrate that a scheme would not be viable should they have to provide affordable housing. If this is the case, we would still seek a lesser contribution on site or a financial contribution. Where a lesser/no contribution is allowed due to viability issues, we can include a requirement in the conditions of a planning permission that stipulates should the development make more profit than envisaged the Council would be able to "claw back" some of that money to go towards affordable housing.</p> <p>In terms of the delivery of affordable housing, the adopted Core Strategy requires Reigate &amp; Banstead to deliver 1,500 affordable dwellings over the plan period (2012-2027), with a target of 100 per year. The latest housing delivery monitor identifies that as of 31 March 2017 475 affordable dwellings have been completed. In 2015/16 89 affordable units were</p>	<p>No change</p>

	<p>completed, this is below the 100 annual target, but the previous year 129 units were completed. The number will fluctuate depending upon which developments are coming forward.</p>	
<p>As much as possible of the new housing should be social housing earmarked for local people, even if the sale of land with such restrictions does not raise as much money for the seller.</p>	<p>This comment is noted. The affordability of housing within the borough is recognised as a key concern of local residents. DES7 has been drafted to provide details on requirements on affordable housing which developers have to adhere to. Planning permission will only be granted for development if the scheme includes the right amount of affordable housing in line with policy, or if the developer can demonstrate that a scheme would not be viable should they have to provide affordable housing. If this is the case, we would still seek a lesser contribution on site or a financial contribution. Where a lesser/no contribution is allowed due to viability issues, we can include a requirement in the conditions of a planning permission that stipulates should the development make more profit than envisaged the Council would be able to "claw back" some of that money to go towards affordable housing.</p> <p>People with an established local connection to the borough are given priority on the housing register</p> <p>The provision of housing is a commercial activity and therefore there is a need for profit to be made by both landowners and developers, otherwise sites will not be brought forward and housing will not be delivered. The national planning policy framework states: To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing</p>	<p>No change</p>

	developer to enable the development to be deliverable.	
All new housing in the borough should be to allow local people to remain in the area and not attract new affluent people from other areas by building large detached houses	This comment is noted. People with an established local connection to the borough are given priority on the housing register. Proposed policy DES5 seeks to ensure an appropriate mix of housing types and tenures. This is intended to provide affordable housing and provide households with a greater range of choices to enable them to remain within the communities of which they are a part.	No change
<b>DES5</b> - the call for many small dwellings will profoundly alter the character of the borough and increase the density of the population. The present mix of larger and smaller houses with gardens is preferred	This comment is noted. Proposed policy DES5 seeks to ensure that a range of housing types is provided but balances this with flexibility for schemes to respond to the local character, site specific viability and practicality. The policy has been informed by the Strategic Housing Market Assessment which identified the need for both small and large housing.	No change
Why is all the new housing identified for Reigate of one type? Why no high/low density??	This comment has been noted. It is unclear what this is in reference to. Proposed policy DES5 seeks to ensure a range of housing types and tenures is provided in all parts of the borough to ensure that a range of housing types is provided but balances this with flexibility for schemes to respond to the local character, site specific viability and practicality. The policy has been informed by the Strategic Housing Market Assessment which identified the need for both small and large housing.	No change

You are not ensuring an appropriate mix of housing types and sizes and you are not offering a good standard of living to future occupants. Your plans do not resolve the housing problem. Instead you are inviting newcomers to the area and not assisting people currently on the housing waiting list

This comment is noted. This comment has been noted. The affordability of housing within the borough is recognised as a key concern of local residents. DES7 sets out what would be required from developers in terms of affordable housing and includes a requirement for smaller developments to provide a financial contribution to affordable housing.

No change

Planning permission will only be granted for development if the scheme includes the right amount of affordable housing in line with policy, or if the developer can demonstrate that a scheme would not be viable should they have to provide affordable housing. If this is the case, we would still seek a lesser contribution on site or a financial contribution. Where a lesser/no contribution is allowed due to viability issues, we can include a requirement in the conditions of a planning permission that stipulates should the development make more profit than envisaged the Council would be able to "claw back" some of that money to go towards affordable housing.

In terms of the delivery of affordable housing, the adopted Core Strategy requires Reigate & Banstead to deliver 1,500 affordable dwellings over the plan period (2012-2027), with a target of 100 per year. The latest housing delivery monitor identifies that as of 31 March 2017 475 affordable dwellings have been completed. In 2015/16 89 affordable units were completed, this is below the 100 annual target, but the previous year 129 units were completed. The number will fluctuate depending upon which developments are coming forward. People with an established local connection to the borough are given priority on the housing register

Proposed policy DES6 seeks to ensure a good standard of

<p><b>DES5</b> - the 30% affordable housing identified for South Park and Woodhatch urban extension sites will not address the needs of those people on the waiting list for social housing and neither will it address the needs of people wishing to remain in the area because of connections with family members currently housed in R&amp;B. The plans clearly provide for newcomers to the area able to afford to purchase their own homes</p>	<p>living to future occupiers, including ensuring that new accommodation as a minimum meets the relevant nationally described internal space standards.</p> <p>This comment is noted. The affordability of housing within the borough is recognised as a key concern of local residents. DES7 has been drafted to provide details on requirements on affordable housing which developers have to adhere to. Planning permission will only be granted for development if the scheme includes the right amount of affordable housing in line with policy, or if the developer can demonstrate that a scheme would not be viable should they have to provide affordable housing. If this is the case, we would still seek a lesser contribution on site or a financial contribution. Where a lesser/no contribution is allowed due to viability issues, we can include a requirement in the conditions of a planning permission that stipulates should the development make more profit than envisaged the Council would be able to "claw back" some of that money to go towards affordable housing.</p> <p>People with an established local connection to the borough are given priority on the housing register</p> <p>Proposed policy DES5 seeks to ensure a range of housing tenures and types on new developments. Reigate &amp; Banstead Borough Council seek to provide affordable housing in line with national requirements, as detailed in annex 2 of the National Planning Policy Framework.</p> <p>In terms of the delivery of affordable housing, the adopted Core Strategy requires Reigate &amp; Banstead to deliver 1,500 affordable dwellings over the plan period (2012-2027), with a</p>	<p>No change</p>
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	<p>target of 100 per year. The latest housing delivery monitor identifies that as of 31 March 2017 475 affordable dwellings have been completed. In 2015/16 89 affordable units were completed, this is below the 100 annual target, but the previous year 129 units were completed. The number will fluctuate depending upon which developments are coming forward. Policy DES7 has been drafted to update the Core Strategy requirements on affordable housing, including a requirement for smaller developments to provide a financial contribution to affordable housing.</p>	
<p><b>DES5</b> - already have an appropriate mix of housing types and sizes, offering a good standard of living to future occupants</p>	<p>This comment has been noted. Providing both market and affordable housing helps to create more balanced communities, helps to avoid social exclusion and provides households with a greater range of choices to enable them to remain within the communities of which they are a part. Reigate &amp; Banstead's Strategic Housing Market Assessment identified a need to provide a balance of small to large properties (40:60). This will enable the borough to meet a need for smaller family housing as part of infill developments where larger family housing normally prevails and larger houses in town centres. Proposed policy DES5 does however allow for some flexibility for schemes to respond to local character issues, practicality and site specific viability.</p>	<p>No change</p>

<p><b>SC2</b> - What does this mean? Would you allow houses that would give their occupants a bad standard of living? Or does this indicate an emphasis on unnecessarily large new house, which will presumably be snapped up by the wealthy or city commuters who will be able to afford them? If so I object.</p>	<p>This comment has been noted. Objective SC2 sets out the intention of the plan, which is then delivered by policies DES5 and DES6.</p> <p>Proposed policy DES5 seeks to ensure that new developments provide a mix of dwelling sizes; it has been informed by the Strategic Housing Market Assessment which identifies that there is a need for both smaller and larger properties. Proposed policy DES6 seeks to ensure that new development is high quality, including that new development meets the relevant nationally described internal space standards.</p>	<p>No change</p>
<p><b>SC2</b> - Yes if it means they are only affordable to the first time buyers.</p>	<p>This comment has been noted. Proposed policy DES5 seeks to ensure an appropriate mix of housing types and tenures on new developments in order to provide a balanced community, avoid areas of social exclusion and provide households with a greater range of choices to enable residents to remain within the communities of which they are a part. However, it is not possible to stipulate that all new development is affordable and for first time buyers, our Strategic Housing Market Assessment identified the need for both small and large housing.</p>	<p>No change</p>
<p>The plan states that 180 houses need to be built by 2022, why is this?</p>	<p>This comment has been noted. Reigate &amp; Banstead has an adopted housing target of 460 net dwellings per annum. The Core Strategy adopted in 2014 sets out the strategy for the borough and identified where potential development could be provided to meet the housing target. The Core Strategy identified the need to deliver 180 dwellings within Banstead over the Core Strategy plan period (2012-2027).</p>	<p>No change</p>

<p><b>DES6</b> - Has a restrictive set of criteria which would appear better suited to larger scale housing developments. There should be a threshold in terms of number of units if the Building Regulations (Part M) are to be applied in order not to penalise smaller developments.</p>	<p>The comment has been noted. (DES6 now DES8) Given the fact that the Borough has an ageing population, ensuring flexible and adaptable living spaces is important. The proposed policy does however allow for some flexibility where it can be demonstrated that it would not be financially viable or that the physical characteristics or location of the site would make the development unsuitable for occupation by older and/ or less mobile people. However, a threshold has been included now. See the Development Management Plan Housing Standards Justification Evidence Paper for further information</p>	<p>No change</p>
<p><b>DES6</b> - some of the requirements of the Policy are unduly prescriptive. For instance:  Part a) requires as a minimum that new homes must comply with the nationally described space standards. It is not clear what evidence RBBC is using on which to justify this policy requirement. Unless there is evidence to show that the housing market has regularly been delivering sub standard homes within the Borough then this part of the policy should be deleted.  Part d) refers to “accommodation providing a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms.” This is not specific and could lead to interpretation issues, leading to an inefficient planning process. Furthermore, the planning system is unable to control the internal layout of buildings, particularly because interior alterations do not fall within the definition of development at Section 55(2) of the TCP Act 1990. It should be left to the market as to how the layout of homes is designed.  Part e) refers to the requirement for sufficient space for drying clothes. As above, this is not specific and is</p>	<p>This comment has been noted. Evidence for this proposed policy is detailed within the Housing Standards Justification Development Management Plan Evidence Document. Paragraph 2.10 of this document and the accompanying table details that currently over 90% of the dwellings in the completion sample met the national space standards. However, it is felt that there is a need for such a policy as those not meeting this target were smaller dwellings. The introduction of the standard is considered to be justified to address this inequality and to ensure that moving forward all new units provide suitable and adequate space for day-to-day living, irrespective of type and number of bedrooms.  'Accommodation providing a convenient and efficient layout' is intentionally not specific in saying that each dwelling proposed should have a particular layout. This criterion is referring to layouts which come under a planning application and requires developers to ensure that units, particularly where developers are constrained by the existing building design, consider the layout and ensure that it is able to provide a good standard of living to future occupiers.  Part e is in line with other authorities adopted Development Management Plans (e.g. Tower Hamlets). It recognises that</p>	<p>No change</p>

<p>unnecessary. Part f) requires all new accommodation to include outdoor amenity space, including balconies and roof terraces and where appropriate communal outdoor space. This is unduly prescriptive as there could be instances where accommodation without private outdoor amenity space is acceptable. For example, where communal or public open space is nearby and easily accessible. Flexibility should be included in the wording of the policy in this respect.</p>	<p>local families need sufficient space for their children to play, for drying clothes etc Part f requires new accommodation to make provision for outdoor amenity space, including balconies and roof terraces and, where appropriate, communal outdoor space. The word private has been removed. This is to ensure a good standard of living to future occupants, including providing opportunity for clothes drying. If evidence could be provided that it is not possible to provide outdoor amenity space/ where there is significant open space nearby this will be taken into consideration, but the starting point is to provide some element of space specifically for residents.</p>	
<p><b>DES5</b> - Providing affordable housing is always a challenge. Smaller dwellings with fewer rooms based on maisonettes or similar could be a potential solution, as could be well-designed terraced houses.</p>	<p>This comment is noted. Proposed policy DES5 - DES 8 seek to ensure an appropriate mix of housing types and tenures on new developments. It seeks to ensure that new housing developments meet the requirements set out in the Affordable Housing SPD.</p>	No change
<p><b>DES5</b> - there appear to be alot of large family houses in Chipstead that are now only occupied by ageing couples. There has been no research on this, but it has been suggested that some of these couples might be interested in downsizing to smaller houses, should they exist within Chipstead and its environs, thereby freeing up large houses to be occupied by families once again.</p>	<p>This comment has been noted. Proposed policy DES5 - DES8 seek to ensure a mix of housing sizes (and tenures) on sites in order to meet the needs of people for example who want to downsize but remain within the communities of which they are a part.</p>	No change

<p><b>DES2 (2):</b> It is not always possible to assemble land in the manner expected by the Council due to land ownership, hence multiple access points are necessary in order to make the best use of urban land. Recent developments in the North of the Borough have proved that these developments can integrate into the character of the area without causing harm.</p>	<p>This comment is noted. Whilst the Council recognises that it may not be possible to assemble sites to reduce impact, should developers intend to develop neighbouring sites then this should be built into plans.</p> <p>Proposed policy DES2 does not say that there cannot be multiple access points, but rather that back garden development should seek to protect, and not create an undue disruption to, the character and appearance of an existing street frontage, particularly where the form and rhythm of development within the existing street frontage is of a uniform appearance.</p>	<p>No change</p>
<p>I FIND THAT NEW BUILDS ARE BEING BUILT AROUND CRAMBING PEOPLE IN AND NOT GIVING THEM LIVABLE SPACE - I WOULD RATHER SEE BUILDINGS AND AREAS WHERE FAMILY CAN LIVE AND SPREAD THEIR WINGS AND NOT BE CLIPPED AND END UP IN SOCIAL ISSUES</p>	<p>This comment is noted. The Development Management Plan seeks to ensure good quality development. Proposed Policy DES6 in particular seeks to ensure that housing meets the relevant nationally described internal space standards, that it provides a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms, that it incorporates sufficient space for storage, clothes drying and the provision of waste and recycling bins in the home and it makes adequate provision for private outdoor amenity space, including balconies and roof terraces, accessible to each dwelling unit and, where appropriate, and/or communal outdoor space.</p>	
<p>Water supply - has the impact of the new housing been investigated?</p>	<p>This comment has been noted. Section 10 of the National Planning Policy Framework makes clear that, as part of sustainable development, planning has a role to play in encouraging the prudent use of resources and minimising waste. As part of positive strategies for addressing climate change, local planning authorities are directed to take full account of water supply and demand issues.</p> <p>In order to deliver this, Planning Practice Guidance (ID 56:</p>	

	<p>Paragraph 13/14) includes provisions for local planning authorities to consider imposing a tighter water efficiency requirement (of 110 litres/ person/ day) to new homes to help manage demand. Local authorities should consider existing sources of evidence; consultations with the local water and sewerage company, the Environment Agency and catchment partnerships; and consideration of the impact on viability of housing. These factors have been considered and there is felt to be a need to introduce this standard. Details are provided in the Housing Standards Justification Development Management Plan Evidence Paper.</p> <p>Reigate &amp; Banstead have worked with infrastructure providers to understand the infrastructure requirements of the proposed development in the Development Management Plan. These are detailed in the Infrastructure Delivery Plan available on the Council's website.</p>	
<p><b>DES5</b> - This is really a matter for the market and area to dictate. We would also encourage the Council to seek to produce an updated SHMA which takes into account the most recent projections to ensure that the DMP document is supported by a robust and up-to date evidence base.</p>	<p>Reigate &amp; Banstead Borough Council recognise the need not to put superfluous requirements on developers. The Council however feels that in order to create balanced communities, there is a need for a range of housing types to be provided on new developments.</p> <p>Proposed policy DES5 requires developers to meet the needs and demands addressed in the latest Council's Strategic Housing Market Assessment but recognises that as a minimum a percentage of small and larger dwellings should be provided. This still allows for the rest of the housing to be proposed in line with market demands. This will create more balanced communities. The proposed policy, does however allow for some flexibility with regards to site specific viability, practicality and local character issues.</p>	<p>No change</p>

	<p>Whilst the Council appreciates that local developers know the local market, there is a need for developments to meet both housing need and demand. This will ensure households have a greater range of choices to enable them to remain within the communities of which they are a part. The Council intends to update the SHMA in the near future.</p>	
<p><b>DES5</b> - Policy DES5 on 'Housing Mix' notes that 10% of units should be one or two bed on schemes of up to 25 units and 20% on those of 25 or more. Spelthorne is currently undertaking work to consider the impact of residential extensions on the stock of dwellings, which tends to increase the stock of larger dwellings whilst depleting the supply of smaller more affordable dwellings. Whilst we welcome the policy approach to housing mix, it is of interest whether Reigate and Banstead have taken housing extensions into account when formulating this policy as a similar study could indicate if a greater proportion of smaller dwellings is required.</p>	<p>This comment has been noted. Reigate &amp; Banstead haven't undertaken a formal study, although we have applied local knowledge and understanding of the Reigate &amp; Banstead context. We would be interested in the findings of the Spelthorne assessment.</p>	No change
<p><b>DES5/Older people</b> - Para50 and 159 of the NPPF - LPA should plan for a mix of housing, capable of providing for the needs of different groups in the community including older people and LPAs should recognise changing demographic needs when assessing their housing need. the current policy will not be compliant with national policy. This policies not sufficiently considered the current need for older people's accommodation or that more specialist accommodation will be necessary over plan period as the national trend is an ageing population. Par 49 - housing proposals should be considered in the context of the presumption in favour of sustainable</p>	<p>It is accepted that there is a need for elderly accommodation, particularly for Extra Care. However, as set out in the "Development Management Plan evidence paper, Housing for Older People", elderly people accommodation needs are varied (some may stay in their homes and bring in care, some may go live with relatives etc). As such, we are taking a varied approach to facilitating elderly persons accommodation needs through the Local Plan given the range of options to older persons housing needs.</p> <p>Policy DES8 covers elderly persons accommodation, which will support new elderly person provision in appropriate locations and resist the loss of existing. DES6 will require a certain</p>	No change

development, and policies for the supply of housing should not be considered up-to-date if the LPA cannot demonstrate a five year supply of deliverable housing sites. Greater flexibility should therefore be incorporated into the wording of the policy to enable the delivery of housing to meet population growth. Policy DES5 seeks to provide a wider and more suitable range of housing options for all groups within the community but it cannot do this because it does not seek to address objectively assessed need. The borough's projected demographic trend indicates that the population will rise by 18% and the number of people aged over 65 will increase by 40% over the plan period, but the plan does not seek to meet this need.

The Housing for Older People document states although there is a clear need for older people's housing, the council considers it unnecessary to include borough wide targets for older people's accommodation. The council's approach is to rely on more units coming forward that are accessible/adaptable rather than specific to elderly people. In addition, even if the preferred strategy for addressing older people's housing need comes forward, there is still a shortfall of 280-380 units on the identified demand of 1,580-1,680 units over the plan period. Therefore, scope for sites such as Land South of Holly Hill, Banstead to come forward and help deliver the full need. The proposed policy states that the housing mix must respond appropriately to local evidence of need and demand for different types of housing within the Councils Strategic Housing Market

percentage of housing for certain developments to be accessible and adaptable, as well as adaptable for wheelchair users. In addition, there are a number of proposed site allocations in the document which include a requirement for elderly provision. Policy DES5 on housing mix also seek to ensure there are the right types of housing being provided, including smaller units which can encourage downsizing.

The aforementioned evidence paper goes on to summarise that "it is not appropriate or necessary to include borough-wide targets for provision of new accommodation" so our approach is not about hitting a numerical target for elderly persons accommodation but rather facilitating a broad range of options.

Para 49 is to do with the Council's housing target of 460 homes a year which has been agreed through the Core Strategy process.

The nature of our borough means that our "larger" allocated sites are still relatively small and it is not considered that this will result in "continual development"



<p>Assessment. The SHMA (2012) specifically demonstrates a 78.4% increase in the population aged 65+ within the forecast period 2008-2033, and represents the most significant increase amongst all age ranges. The 85+ group represent the largest forecasted increase at 145.7%.</p> <p>The forecasted increase in elderly population is therefore significant within the SHMA (2012). However, no mention for the provision of older people care has been made mention of within DES5. At present, there are 28,442 elderly care home beds within the Surrey and Sussex Healthcare Trust boundary. There is no real concentration of beds amongst the 24 local authorities that make up the trust boundary. Arun (8.1%), Reigate and Banstead (6.7%) and Wealden (6.6%) account for the largest share of care home beds in the region. (ONS census). There is and will be an ever increasing need to provide older people accommodation within Banstead. The proposed policy DES5 is not in line with the provisions of CS14 as it fails to explicitly consider the requirements of older people. This policy needs to be amended so that it clearly addresses the needs of different groups, including older people or another policy should be added to the DMP which states what the need is for older people's accommodation and how the need will be met over the plan period.</p>		
<p><b>DES5/Older people</b> - wrong approach to addressing the need for older people's accommodation. Ensuring new housing is adaptable and flexible in relation to the occupant's age does not address the existing need.</p>	<p>It is accepted that there is a need for elderly accommodation, particularly for Extra Care. However, as set out in the "Development Management Plan evidence paper, Housing for Older People", elderly people accommodation needs are varied</p>	<p>No change</p>

There is no way to guarantee that elderly people will occupy the flexible accommodation. This subsumes elderly accommodation in overall general needs housing which is contrary to paragraph 50 of the NPPF. Paragraph 2 of DES6 states that if it can be demonstrated that it is not viable to include flexible accommodation then it will not need to be included. Viability testing will result in less older peoples accommodation against a housing need figure that is already suppressed, and compound under delivery. Approach should be amended as there is no fall-back position if developers can demonstrate it is unviable to include. The correct approach is that set out in Paragraph: 037 Reference ID: 3-037-20150320 of the NPPG.

The background paper 'Housing for Older People (June 2016)' set out clearly that up to 2014 there has been a significant shortfall in the delivery of extra care housing, with the stated position at Table 2 being the provision of 60 units against a requirement of 306 (a shortfall of 246 units, or expressed differently less than 20% of the requirement provision being met). When taking into account the predicted future growth set out in Table 4 the demand figures are expressed as an additional 392 to 408 units between 2014 and 2027 depending on growth scenarios. On the basis of the existing provision amounting to a mere 20% of the demand to 2014 there is a clear lack of provision within the Borough due to there being no defined policy support or target for delivery, despite there having been the Eastern Surrey Extra Care Housing Strategy

(some may stay in their homes and bring in care, some may go live with relatives etc). As such, we are taking a varied approach to facilitating elderly persons accommodation needs through the Local Plan given the range of options to older persons housing needs.

Policy DES8 covers elderly persons accommodation, which will support new elderly person provision in appropriate locations and resist the loss of existing. DES6 will require a certain percentage of housing for certain developments to be accessible and adaptable, as well as adaptable for wheelchair users. In addition, there are a number of proposed site allocations in the document which include a requirement for elderly provision. Policy DES5 on housing mix also seek to ensure there are the right types of housing being provided, including smaller units which can encourage downsizing.

The aforementioned evidence paper goes on to summarise that "it is not appropriate or necessary to include borough-wide targets for provision of new accommodation" so our approach is not about hitting a numerical target for elderly persons accommodation but rather facilitating a broad range of options.

The nature of our borough means that our "larger" allocated sites are still relatively small and it is not considered that this will result in "continual development"

The 2015 ministerial statement does not allow for standards like Lifetime Homes to be required anymore.

(October 2005) At 2005 this report predicted a requirement of 259 extra care units, based on an assumed 50:50 split between rental and sales. It is clear therefore that the recognition of need has been consistent, yet the delivery has failed to materialise. The over reliance in this emerging DMP on delivery solely from the larger housing sites of 200 or more units (paragraph 2.49) will therefore only continue to result in the failure to deliver this required housing for older people, contrary to paragraph 50 of the NPPF. The scale of the problem is further exacerbated when considering the need to deliver all forms of specialist housing for older people, thereby including sheltered and very sheltered housing. The background report states that the annual requirement is equivalent to 115 units, amounting to 25% of the total annual housing requirement in the Borough (paragraph 2.25 of the background paper).

Without a clear policy to support the provision of schemes, and an equivalent monitoring target, the net result will be a continued failure to deliver. The expectation of the DMP and the background paper that major developments will provide this on site in addition to affordable housing is unfortunately unrealistic and lacks any policy basis as it currently stands. Policy DES5 only requires developments to respond to the need and demand set out in the SHMA (which in the background paper on Older People is shown to not reflect the demand based on population statistics) or provide at least a certain amount of smaller and larger units. There is nothing in this policy to specifically

<p>recognise the provision of housing that meets Lifetime Homes standards or incorporation of the HAPPI standards with regards to housing for older people. Typically, smaller dwellings provided by mainstream house builders lacks the required facilities and services for specialist housing.</p>		
<p>DES5 - makes no provision for older people (as required by CS14 and NPPF paragraph 50), for older people seeking single storey homes (as required by national Planning Practice Guidance), or for people seeking to reside in caravans (as is a legal duty under section 124 of the Housing and Planning Act 2016). Proposed policy DES5 therefore needs to be amended to state that the council will support the provision of residential park home caravans to meet the needs of older people looking for more affordable low cost accommodation in single-storey homes on allocated and unallocated site in sustainable locations closed to existing neighbourhood facilities. Our client's site KBH16, on land adjacent to Holly Lodge Mobile Home Park, provides one such sustainably located site close to the Local Centre at Lower Kingswood that should be allocated for park home development to address this need.</p> <p>Section 124 of the Housing and Planning Act 2016. This came into force on 12th July and places a duty upon the Local Authority to address the housing needs of people residing in or resorting to their district with respect to the provision of caravans...the DMP Consultation Document still does not make any reference to park homes, and the draft Proposals Map</p>	<p>A separate policy has been included which covers elderly person accommodation and caravans. This recognises that there is a need for elderly accommodation, particularly for Extra Care. However, as set out in the "Development Management Plan evidence paper, Housing for Older People", elderly people accommodation needs are varied (some may stay in their homes and bring in care, some may go live with relatives etc). As such, we are taking a varied approach to facilitating elderly persons accommodation needs through the Local Plan given the range of options to older persons housing needs.</p> <p>Policy DES8 covers elderly persons accommodation, which will support new elderly person provision in appropriate locations and resist the loss of existing. DES6 will require a certain percentage of housing for certain developments to be accessible and adaptable, as well as adaptable for wheelchair users. In addition, there are a number of proposed site allocations in the document which include a requirement for elderly provision. Policy DES5 on housing mix also seek to ensure there are the right types of housing being provided, including smaller units which can encourage downsizing.</p>	<p>No change</p>

<p>(Interactive Map) does not make any specific provision for such residential caravans. This therefore means that the Council is now ignoring its legal duty to plan for those people who wish to reside in such caravans making the proposal local plan open to legal challenge in the courts</p>		
<p>We note paragraph 2.40. This considers a 4.5 income multiplier to provide a benchmark of affordability. The report does not appear to provide details on the price of entry level homes in Reigate &amp; Banstead. We note appendix 2 however. We note that for lower quartile incomes (23,747) a multiplier of 4.5 would fail to reach the lowest priced homes in the borough (1 bed home) even with a deposit of 10% factored-in. Appendix 2 does acknowledge this is a problem for lower income households. Care needs to be taken with median incomes as these may not be typical for first-time buyers. Even so, median income households would struggle to afford many products in the district. Moreover, a quick search on Rightmove for the town of Reigate (date: 10 October) shows a very limited supply of one bedroom homes. Only two came up. The cheapest home costs £122,000 and is only available to the over 60s. The other one cost £125,000. Given the pressing need to improve affordability and the supply of homes to first-time buyers, the Council needs to keep construction costs down. The Council is unjustified in adopting the nationally described space standard. [in relation to policy criteria (2)] In terms of the requirements of 2(b) – 5% of dwellings to be ‘wheelchair user dwellings’ - we note the Housing Standards Justification on page 19. The Council is</p>	<p>This comment has been noted. There are more affordable locations in the borough, Reigate town is within our highest value housing “zones”. Paragraphs 2.6 to 2.11 consider the degree to which a sample of 875 new homes built in the borough over the last 5 years met the national space standard. Over 90% of the new homes built did meet the standard. Of those not meeting the standard, the highest proportion was the 2- and 3-bedroom houses. The most significant impact on affordability of imposing a standard will be on 2-bedroom houses, 2-bedroom flats, and 1-bedroom flats. The introduction of the national space standard is considered justified in ensuring that smaller homes achieve a good standard of living accommodation.</p> <p>The median value is felt to be most appropriate estimate as it reflects the medium income level. Other methods would be distorted by extreme high and low values. The Council recognises that the affordability of housing is a concern for many people in the Borough and that it is important to keep the cost of construction low. However, the number of residents and households in the Borough experiencing mobility challenges is likely to grow over the plan period, driven in part by an ageing population, and there will be an increasing need for accommodation which is accessible and adaptable. The Council recognises that some improvements can be made to the existing housing stock, but reflecting that not all existing</p>	<p>No change</p>

<p>downplaying the costs of building to Part M 4 (3) adaptable and accessible homes. The costs provided by the EC Harris report for the DCLG, shows a range of costs related to building category 3 accessible homes that are significantly in excess of these figures, e.g. for terraced homes upwards (it is typically the cost of providing lifts). The Council has not demonstrated properly the viability of stipulating compliance with Part M4 (3). The costs provided by the EC Harris report for the DCLG, shows a range of costs related to building category 3 accessible homes that are significantly in excess of these figures, e.g. for terraced homes upwards (it is typically the cost of providing lifts). The Council has not demonstrated properly the viability of stipulating compliance with Part M4 (3).</p>	<p>homes will be able to be adapted, and that a portion of new residents to the borough will need adaptable and accessible homes. As outlined in the Development Management Plan Housing Standards Justification Evidence Paper, the combination of requirements in all scenarios, would ensure that the cost of the impact remained below the 0.5% (of total development costs) threshold, considered to have a negligible impact on development viability. Building costs have been taken from national standards BICS and adjusted for local circumstances.</p> <p>EC Harris costs have been taken into consideration. The additional costs identified by EC Harris have been compared to the overall development cost of a standard development. Where the total costs associated with complying the standard represents less than 0.5% of total development costs, it is considered that the viability impact would be negligible. Based upon this it was felt that up to 1,250 of Category 2 accommodation against a total possible need/ demand for 1,785-2,460 dwellings should be provided and up to 210 units of Category 3 accommodation against a total identified need of 450-695 units.</p>	
<p>DES5 - [reference to housing mix]...is too ambiguous and does not provide the clarity required of local plan policies. The Council, reflecting the latest SHMA, should stipulate the mix of houses required. In the way that the policy is currently worded it would be impossible for an applicant to know what the Council required. This would be contrary to the NPPF and the principles of the presumption in favour of sustainable development. The Council should specify and justify the mix, not the applicant. Part (b) is clear about what</p>	<p>This comment is noted. Reigate &amp; Banstead Borough Council have a Strategic Housing Market Assessment that was produced in 2012. This has been used to stipulate the mix of housing needed. Given the specific need for smaller houses identified by the Strategic Housing Market Assessment and the need for smaller houses to create balanced communities, it is felt that there is a need to prescribe standards. There is flexibility however built into this policy to respond to site specific viability, practicality and local character issues.</p>	No change

<p>is required in terms of the mix. Part (a) is superfluous and should be deleted. Part 1(d) is too ambiguous. The Development Policies Local Plan in conjunction with the Local Plan Part 1 (core strategy) should, ultimately, provide the only source of local planning policy. The Council cannot require applicants to conform to policies in documents that have yet to be produced, examined and adoption. Furthermore, the Council cannot require compliance with requirements contained in SPD. SPDs should not be used to introduce policies or add to development requirements. The Council's approach is contrary to national policy.</p>	<p>Reigate &amp; Banstead Borough Council also have an adopted Affordable Housing SPD hence the reference to both documents within the policy. Rather than be too prescriptive, reference to these policies allows for standards to be updated for example to reflect national policy changes.</p>	
<p><b>DES5</b> - Part 1 b) of the proposed policy states that development must include at least 20% small market dwellings (one or two beds) and at least 10% large market dwellings on sites of 25 units or more. This part should be deleted as it is unnecessary. The requirements of Parts a), c) and d) are sufficiently robust to require development to contribute to the Council's objective of providing the right range of homes in the Borough. The NPPF does not require Local Authorities to prescribe housing mix. In order to accelerate housing delivery this should be left to the market. This represents positive planning.</p>	<p>This comment has been noted. Given the specific need for smaller houses identified by the Strategic Housing Market Assessment and the need for smaller houses to create balanced communities, it is felt that there is a need to prescribe standards. There is flexibility however built into this policy to respond to site specific viability, practicality and local character issues.</p> <p>The NPPF requires Local Authorities to use their evidence base to ensure that their Local Plan meets the objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with NPPF policies and to plan for a mix of housing based on current and future demographics trends, market trends and the needs of different groups in the community. This policy is believed to accord with this.</p>	<p>No change</p>

<p><b>DES5:</b> There are minimum thresholds for small dwellings, but no such thresholds for larger dwellings. This could promote an unbalanced housing mix, tending towards 1 and 2 bedroom flats (which, on some sites, we know developers need no encouragement to build anyway). Add provisions for a minimum proportion of larger units. For example even fully flatted, town centre, schemes, should provide a number of 3 bed units.</p>	<p>This comment is noted. Proposed policy DES5 seeks to ensure that on sites of 20 units or more at least 20% of market housing units must be larger (three and four bedroom dwellings) and in town centres at least 10 % of schemes of 20 or more dwellings must be 3/4 bed units. It is felt that this reflects the local needs identified in the Strategic Housing Market Assessment.</p>	<p>No change</p>
<p>It is extremely important that there is a mix of social housing, part ownership and lower density housing.</p>	<p>This comment has been noted. Proposed policy DES5 - DES8 seek to achieve this</p>	<p>No change</p>
<p>Housing development should be piecemeal infill which does not significantly alter the balance of the area.</p>	<p>This comment has been noted. Paragraph 83 of the National Planning Policy Framework says that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. However, paragraph 47 requires local planning authorities to describe how they will maintain delivery of a five-year housing supply. Reigate &amp; Banstead has an adopted housing target of 460 net dwellings per annum. In order for Reigate &amp; Banstead Borough Council to meet its housing need, it is recognised that there is may be a need to release a small amount of Green Belt. The Core Strategy identified Broad Areas of Search and further work has been undertaken (Sustainable Urban Extension Technical Reports 1 &amp; 2) to identify potential Sustainable Urban Extensions within these areas. Proposed policy MLS1 says that these areas will continue to be treated as Green Belt until the Council are unable to demonstrate a five year housing supply, they will then be released in a phased manner. The Development Management Plan identifies a number of town centre opportunity sites and these are intended to be</p>	<p>No change</p>



	<p>developed first.</p> <p>Policy DES5 stipulates that housing mix should take account of the character of the surrounding area</p>	
<p><b>SC2</b> - We have more than enough large homes. What the town needs is starter homes. Which should be provided by the council and NOT allowed to be sold on at inflation prices. Must be returned to stock.</p> <p>The ONLY new housing that is really needed is DEPOSIT FREE, 2 bedroomed flats and houses for the young people who live here and cannot currently get on the house ladder.</p>	<p>This comment has been noted. Proposed policy DES5 seeks to ensure a range of housing types and tenures on new developments. This is guided by documents including the Strategic Housing Market Assessment which details need and demand for different types of property.</p> <p>The need for affordable housing is noted, proposed policy DES7 covers affordable housing in line with national policy It is not possible for the Council to insist on deposit free properties.</p> <p>.</p> <p>Reigate &amp; Banstead Borough Council have an adopted Core Strategy with a housing target of 460 net dwellings per annum. It is intended that these will be delivered in the existing urban area and potentially the Sustainable Urban Extensions (proposed policy MLS1 says that the proposed urban extensions will only be released when the Council can no longer identify a five year housing supply).</p>	No change
<p><b>DES5</b> - this policy reflects research on household size but not demand - surveys indicate that households are getting smaller so we need more small dwellings. Yet companies are struggling to find staff as they cannot find the family homes needed. You insist on small dwellings for many who don't want to live in small dwellings despite being small households. The data does not correctly identify demand. Only open markets</p>	<p>This comment is noted. This proposed policy is based on the findings of the Strategic Housing Market Assessment which investigated both the need and demand for different sizes and types of housing. The policy also only guides a certain percentage of the units on the site, the rest is for the applicant, based on market demands to decide on the balance. The policy also allows the flexibility to deviate from the requirements where it can be clearly demonstrated there is no</p>	No change

<p>can do that. There are plenty of small households who don't want to live in a 1/2 bed house. Most parents keep one spare room for the returning kids or grandchildren. Policy biased by inadequate analysis of data</p>	<p>market demand.</p>	
<p><b>DES5</b> - We are concerned that future developments are built to include green spaces and affordable houses or starter homes. The Preston Estate has only about 25% affordable housing we believe and that is on a Council Estate. We should like to see more employment generated at The Waterfield Trading Park on this Estate.</p>	<p>This comment is noted. Proposed policy DES5 seeks to ensure a range of housing types and tenures are provided on all new developments - recognising that in some cases there may be exceptions due to site specific viability, practicality and local character issues- to avoid creating areas of social exclusion. DES7 Affordable Housing sets out the approach to affordable housing delivery. This seeks to obtain affordable housing whilst recognising that it may not always be viable for a development to provide the full amount of affordable housing - this is in line with national policy which states that: "To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable."</p> <p>In terms of employment provision, Pitwood Park Industrial Estate is proposed to be designated as a local employment area. Proposed policy EMP2 recognises the importance of local employment areas and proposes some flexibility in order to encourage and support small businesses, respond to existing business needs and improve the viability of these areas.</p>	<p>No change</p>

<p><b>DES5</b> is not compliant with the National Planning Policy Framework or the Reigate &amp; Banstead Core Strategy 2014.</p> <p>The Development Management Policies are meant to support the strategic policy objectives set by the Councils Core Strategy. As drafted, Policy DES5 conflicts with Core Strategy Objectives SO1 and SO2 and Policy CS6. These policies support intensification within urban areas in the borough. As drafted, Policy DES5 would effectively stop any urban intensification, as it would render all back land sites unviable. The Core Strategy Inspector made specific reference to the need for intensification within suburban settlements to enable sufficient windfall sites to come forward.</p> <p>The council is reliant on windfalls as a component of its land supply. If the policy was to come into force it would effectively restrict this component of supply meaning that the planned Sustainable Urban Extensions on greenbelt land may need to be released earlier in the plan period. This would undermine the overall spatial strategy set by the Core Strategy, and may leave the council open to challenges at appeal based on 5 year land supply arguments if Green Belt releases cannot be accelerated. The Council rely on 250 windfall sites within their 5 year housing land supply which will be impossible to achieve if Policy DES5 is carried forward.</p>	<p>Reigate &amp; Banstead Borough Council note that they do rely on windfalls as a component of its land supply and recognises the role that back garden development plays in the north of the Borough.</p> <p>Proposed policy DES5 seeks a range of housing types to be provided, for example the provision of smaller family homes as part of infill developments. There is a need for this type of housing in the north of the Borough, for example from downsizers who wish to remain within their communities. The proposed policy does however allow for some flexibility with regards to site specific viability, practicality and local character issues.</p>	<p>No change</p>
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**SELF BUILD**

<p>DES7 - Should be widened to include starter homes guidance based on government policy and more specific policies on social/affordable homes.</p>	<p>Noted, and agreed that starter homes and affordable housing are important topics that will be reflected in the local plan. However, the experience of other councils on self and custom build housing suggests that trying to include affordable housing provisions specifically within a self and custom house building policy results in an overly complex policy that is open to challenge. The self build policy will therefore be kept focused on that topic only. Affordable housing provision in general is covered by policy CS15 of the 2014 Core Strategy and by the 2015 Affordable Housing SPD (referred to in Policy DES5). There have been some changes at a national level around affordable housing so the DMP will update these policies where necessary, including reference to starter homes.</p>	<p>Policy DES7 on Affordable Housing added</p>
<p>Self build homes can take many years to build, often at unsocial hours, and there should be some safeguards for neighbours.</p>	<p>This is noted. However, self and custom build properties will be subject to the same planning requirements as any other development, so this is covered by proposed policy DES10 Construction Management.</p>	<p>No changes</p>
<p><b>DES7</b> concerns self-build homes. It is not considered appropriate for a threshold for the provision of self-building housing on sites to be applied as this would not be appropriate on all sites in the Borough. The identification of specific sites for self-build as part of the site allocation process is however supported.</p>	<p>This comment has been noted. Based on data from the Self Build Register, it has been decided that windfall self-build sites and the Council's requirement to take consideration of the need for self-build when delivering housing will be sufficient to meet current demand.</p>	<p>No changes</p>

**DES7** - We note that a policy supporting self and custom build homes could improve the deliverability of smaller sites, which are often more expensive to bring forward than larger ones. Some of the smaller sites considered not to be viable in the evidence underpinning the DMP could be reversed through such a policy. Therefore, this policy could have a direct effect on whether there is a build on Green Belt and countryside land in this plan period.

For this reason we consider it inappropriate that the Council has left this policy until the Regulation 19 consultation. This policy should be written and consulted on prior to the Regulation 19 consultation, together with consideration of additional sites that might be suitable for this, such as previously overlooked, particularly smaller, sites in the previously developed urban areas of the Borough. This could include:

- development over clusters of garages (e.g. 5-10 unit developments)
- retrofit of first floor and above, such as above retail frontages in town centres and local retail centres.
- mixed use, life-work schemes in sustainable locations (such as retaining the low-cost independent retail provided along Brook Road in Redhill, while providing accommodation in this location).

This comment has been noted.

At the time of preparing the Regulation 18 Development Management Plan there was very little national guidance with regards to self and custom build homes and our self build register did not allow any informed decision to be made in terms of need. It was felt that we should seek residents opinions on proposed options for a policy, see if any additional guidance was produced and let the register embed. Based on data from the Self Build Register, it has been decided that windfall self-build sites and the Council's requirement to take consideration of the need for self-build when delivering housing will be sufficient to meet current demand.

Sustainable Urban Extensions will only be released once the Council can no longer identify a five year housing supply, and will then be released in phases.

In terms of the other potential sources of sites, Reigate & Banstead Borough Council have written to owners of garages (where it has been possible to identify owners) capable of delivering more than 5 dwellings.

Given the number of retail units in the borough and that offices can be brought forward through permitted development, it was not felt appropriate to write to all upper floor retail owners. Whilst a large proportion of garage sites are either owned by Reigate & Banstead or Raven, there are a greater number of above ground floor retail frontage occupiers.

Brook Road is also proposed to be assessed in the HELAA.

Self build policy not progressed

<p><b>DES7</b> - It is noted that Reigate and Banstead Borough Council now holds a self and custom build register, and is intending to use the evidence of demand to develop a policy to enable housing to come forward via this mechanism. Horsham District Council also holds such a register, and would welcome joint working in the future to establish if any of the demand is common to a number of authorities rather than being derived from within a District and Borough. It is considered that this would assist all authorities in setting a realistic threshold as to the level of self / custom build that should be provided.</p>	<p>Noted and will continue to share information in relation to self build via established officer meeting channels. However, due to the introduction of a local connections test to joining Part 1 of the Self Build Register, it is likely that those joining the register in the future will be connected specifically to Reigate &amp; Banstead Borough.</p>	<p>Self build policy not progressed</p>
<p><b>DES7</b> - RBBC should only adopt a policy requiring Custom and Self Build plots on sites if there is evidence to show there is a demand for such projects in the Borough / certain localities.</p>	<p>This comment has been noted. Based on data from the Self Build Register, it has been decided that windfall self-build sites and the Council's requirement to take consideration of the need for self-build when delivering housing will be sufficient to meet current demand.</p>	<p>Self build policy not progressed</p>
<p><b>DES7</b> - The creation of a register seems a sensible approach but self and custom build schemes could inherently lead to buildings that are disparate in style, giving rise to a ramshackle appearance that could appear ugly and lacking in harmony in the future. What measures will be used to ensure that this does not happen.</p>	<p>This comment has been noted. Self and custom build schemes would be required to be completed in accordance with the other proposed design policies, for example proposed policy DES6 which seeks to ensure that housing is of a high quality and DES1 requires that the development responds appropriately to the character of the area</p>	<p>Self build policy not progressed</p>
<p><b>DES7</b> - Interested that self build is a possible model to be explored for housing developments.</p>	<p>This comment has been noted.</p>	<p>Self build policy not progressed</p>

<p><b>Park homes</b> can assist the council in meeting that objective by providing a good standard of affordable low costs single storey homes for older people who seek to reside in caravans. The designation of a site for such homes will therefore help the local planning authority to address Core Strategy Policy CS14 which states that the Council will seek a range of housing types (which should include park homes, especially now that there is a legal duty to plan for such), an appropriate mix of dwelling sizes (which should include 1-2 bedroom park homes), and to encourage the provision for housing for the elderly. Currently, the proposed policies of the DMP make no provision for park homes, and therefore if a draft DMP is prepared for adoption on this basis it will be unsound (as well as unlawful).</p>	<p>This comment has been noted. Work has been undertaken on the provision of residential caravans, and a policy (DES8) has been added regarding this, although it has not been felt necessary to allocate a specific site for caravans.</p>	<p>Section on caravans included in Policy DES8 on Specialist Accommodation</p>
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CONSTRUCTION AND POLLUTION		
<p>In Policy DES9, clause 3, the wording should be amended to take account of future changes in aircraft numbers, noise and intrusion, particularly if Gatwick runway 2 is authorised. In line 2 of para 3, it should read ‘. . . be demonstrated that present and predicted noise levels . . .’, and in line 4 add the word ‘expected’ at the beginning.</p>	<p>Due to points made in other representations, it has been clarified elsewhere in the DMP that the noise contours should be based on CAA ERCD report 0308, which includes predicted noise levels up to 2030 and for a hypothetical two runway scenario - that is, beyond the current plan period. Therefore, the suggested changes are not felt to be needed, but a further clarification of which noise contours are being used will be included in this policy. Note that the relevant policy has changed number to DES11.</p>	<p>Explanation that airport noise contours are based on CAA ERCD Report 0308 added to DES11 reasons.</p>

<p>Has an environmental noise and acoustic survey been undertaken to prove beyond doubt that the proposed redevelopment in Banstead does not increase the already high noise pollution?</p>	<p>As the proposals in the DMP document are only potential site allocations, with no firm plans yet about the exact layout or design of any development that takes place on these sites, such a survey has not yet been carried out. If a possible increase in noise to unacceptable levels was a concern, this would need to be addressed in a planning application. The requirement for this is set out in proposed policy DES11, which states that development will only be permitted where it can be demonstrated that there will not be a significant adverse impact or unacceptable impact on noise levels in the surrounding area, either individually or cumulatively.</p>	<p>No change</p>
<p><b>DES9</b> - The airport is a recognised insitu noise generating operation due to aircraft noise. Should ensure that new noise sensitive development is not afforded planning consent in noise contours above the 57 dBA leq contour.</p>	<p>This comment has been noted. Policy DES11 says that noise sensitive uses should be located away from existing sources of noise. It also requires that residential development falling within the 57dB LAeq (07:00 to 23:00) noise contour must be accompanied by a full noise impact assessment and demonstrate that - through design, mitigation or attenuation measures - future occupants would not be subject to unacceptable level of noise disturbance both internally and externally.</p>	<p>No changes.</p>



<p>DES9(3) - Other noise contour definitions are sometimes used in preference to 57dB LAeq, and so suggest this policy is qualified by a phrase such as 'or other nationally accepted standards'.</p> <p>There should there also be a similar policy relating to noise from Redhill Airport.</p>	<p>In order to ensure clarity and consistency, it is believed that this policy should include a single, measurable metric for noise annoyance - and 57dB LAeq is the metric supported by the Department for Transport, and the justification for this figure is included in the relevant background evidence paper.</p> <p>The noise created by Redhill Aerodrome is significantly less than that from Gatwick Airport, and it is felt that it is suitably covered by the remainder of the policy.</p>	<p>No changes.</p>
<p><b>DES9</b> To give appropriate consideration to possible future noise impact associated with a second runway at Gatwick Airport, the adopted Crawley Borough Local Plan (2015) draws upon the noise contours published by the Civil Aviation Authority (CAA) in its ERCD Report 0308 (2003). These contours represent the most recent information published by the CAA, and have been considered by the Planning Inspector and found to be a sound basis for decision making at the Crawley Borough Local Plan Examination in Public (March 2015).</p>	<p>Noted and agreed.</p>	<p>Explanation that airport noise contours are based on CAA ERCD Report 0308 added to DES11 reasons.</p>
<p>Existing trunk roads are extremely busy and congested, the A23 through the heart of the borough serves Merstham, Redhill, Horley as well as East Surrey Hospital and Gatwick Airport. The A25 serving Redhill and Reigate is also congested, with Reigate becoming a complete bottle neck at peak times. This is without mentioning the impact of the M23 and M25 when</p>	<p>Pollution is covered in Policy DES9, natural resources are covered in policies NHE1-4, transport issues are covered by Policy TAP1, and inconvenience to residents caused by the development process is covered by Policy DES8. The services of bus and train companies are a matter for private companies, though the Council will work with them to encourage the best possible service to be provided to local people. If ridership of train services increases, the Council</p>	<p>No change</p>

<p>there is an incident. Potentially building 1600 new homes and or business development is not going to help the issues unless new and existing roads are developed as part of the over development process. Reading the document we didn't see that this aspect had been considered at all, though pollution, sustainability of natural resources and inconvenience to people has an affect on there lives. Potentially the local population will expand, more people will use public services such as busses and trains. Will this services be increased?</p>	<p>would be encouraging of an increase in station parking if it is necessary and if it complies with other policies in the DMP relating to parking - but again, stations are owned by Network Rail, so this would require cooperation with them. Every individual proposal for a new development must demonstrate that it will not have a serious impact on traffic congestion.</p>	
<p><b>SC3</b> - This is an opportunity for the borough to work with developers and other stakeholders to push the boundaries in best practice sustainable development and co-ordinated infrastructure planning and delivery.</p>	<p>Noted and agreed, the policies in the DMP seek to achieve this, including policy DES1 which requires high quality design</p>	<p>No change</p>
<p>Early consultation should be required on developments, with clear information and assistance.</p>	<p>The sites proposed in the draft DMP are sites which have been identified as being in principle suitable for the proposed development. However, any development which comes forward will still have to go through the normal planning application process. National planning policy does not allow for early consultation to be required of developers (paragraph 189 of the National Planning Policy Framework). However, early engagement is strongly encouraged by both the Council and the UK government, and this will continue.</p>	<p>No change</p>
<p><b>DES8</b> - Please consider widening this policy from a focus on construction management alone to include subsequent repairs and maintenance. Similar standards for construction management should be applied to maintenance and improvements of existing dwellings.</p>	<p>This is beyond the remit of the DMP. Planning conditions can cover specific issues with future maintenance where necessary</p>	<p>No change</p>

<p>With all developments a construction management statement must be compulsory and restrictions on site deliveries and bonfires enforced.</p>	<p>It is not necessary to make construction management statements compulsory, as Policy DES8 allows the council to require such a statement where necessary, while exempting the few developments that may not really need one due to size or location. Obviously all restrictions on site deliveries, bonfires, or any other restrictions placed on developments will be enforced to the best ability of the Council.</p>	<p>No change</p>
<p><b>DES8</b> sets out a requirement for construction management plans, secured by condition, on minor and major developments for new residential units. The benefits of construction managements plans is acknowledged but it is considered that these should only be mandatory on major developments which involve greater construction activity. It is considered that the need for construction management plans should be flexible and considered on a case by case basis having regard to the size of the development and space available on site. Some smaller sites may justify the requirement for a construction management plan, whereas on some larger sites with a small amount of development taking place this should not be necessary.</p>	<p>Policy DES8 says the Council 'may' require construction management statements. It is therefore not proposed that they be mandatory for all development, and they will be considered on a case-by-case basis.</p>	<p>No change</p>

<p><b>DES8</b> (or elsewhere, as relevant) Reinstatement of dropped kerbs where redevelopment makes them redundant. In the past there has been no blanket requirement to reinstated dropped kerbs where redevelopment has rendered the dropped kerb unnecessary. Introduce a general requirement to reinstate kerbs in these circumstances (instead of leaving it to being applied on a case by case basis by condition, with the risk that it is overlooked).</p>	<p>The reason section for Policy TAP1 states: "Good design and implementation is important, including for access and servicing, to minimise impact on street scene and protect public safety. As part of this, developers will be expected - as part of their development – to remove any dropped kerbs and crossovers made redundant by the development and reinstate the footway/verge"</p>	<p>No change</p>
<p><b>DES8</b> - Infrastructure such as road surfaces, drains and kerb stones are being badly damaged regularly by developers' construction lorries, with the Council (i.e.: the current local taxpayers) often picking up the repair bill. This is a situation which is highly unfair and unacceptable; and needs to be addressed.</p>	<p>This issue is covered by Policy DES8(2)[c] which states that construction management statements will need to address the protection of and remediation of any features that are damaged during development. The policy wording will be slightly amended to specifically mention drains and kerb stones, although as road surfaces receive regular wear and tear from all vehicles it would not be appropriate to specifically mention them in this policy wording. However, in cases where it is clear that a road will be damaged by the construction process, this would be covered by the current wording.</p>	<p>"drains, kerb stones" added to DES8(2)[c].</p>
<p><b>DES8</b> - Building contractors fill up local streets, park too close to junctions, park on green spaces, and drive badly.</p>	<p>Policy DES8 (2)[a] calls for construction management statements to address traffic management issues where this is appropriate to the likely impacts of a development, and (2)[c] refers to the protection of verges and footways that may be damaged during works. Issues of inappropriate parking or bad driving will be dealt with by the relevant bodies whoes remits these are i.e. Council parking enforcement team or the police. You can report inconsiderate parking on the Council's website here <a href="http://www.reigate-banstead.gov.uk/info/20150/parking/465/report_inconsiderat">http://www.reigate-banstead.gov.uk/info/20150/parking/465/report_inconsiderat</a></p>	<p>No change</p>

	e_parking	
<b>DES9</b> - The proposed measures to address poor air quality should include building design measures to reduce indoor air pollution in areas that are in AQMAs, adjacent to main roads or other sites likely to have higher air pollution (i.e. higher insulation and ecological building design quality, and associated mechanical/passive ventilation systems). This should be added to the policy alongside the measures listed as a) and b).	The importance of considering internal air quality standards will be added to the policy. The suggestion of mitigation measures has been moved to the reasons section and updated to include building design measures such as higher insulation	Policy updated to include reference to internal and the reason section includes reference to building design measures
<b>DES9</b> - All of this seems sensible except paragraph 4. It is known that there are areas in the Horley area that have high levels of nitrogen oxides that can be attributable to aeroplane as well as to road vehicle emissions. There is also epidemiological evidence, rarely discussed publicly, that these can be correlated to higher incidences of diseases in those neighbourhoods. It would be unreasonable to permit houses to be built in these localities even with a condition that user exposure should be minimized. Attention should be given to avoiding building homes close to busy main roads and their intersections where air contamination levels can be dangerously high. In considering all such development applications air quality assessments should be made that are available to the public at large.	<p>The assessments of air quality which are carried out by Reigate &amp; Banstead include assessment of nitrogen dioxide levels, and monitoring of these levels occurs throughout the Borough, with the data made publically available. The resulting Air Quality Management Areas, which are areas with particularly high levels of nitrogen dioxide, include some areas in Horley - see the Council website for more information <a href="http://www.reigate-banstead.gov.uk/info/20333/air_quality/542/air_quality_reviews">http://www.reigate-banstead.gov.uk/info/20333/air_quality/542/air_quality_reviews</a></p> <p>Where a planning application is submitted in Air Quality Management Areas applications must be supported by such information as is necessary to allow a full consideration of the impact of the proposal. Policy DES9 (1-3) has also been revised to be more detailed on expectations around pollutants.</p>	No change

<p><b>DES 9</b> - More cars equal air pollution which we already have enough off coming from London, the airports and M25. Has this been monitored and what will this increase in population do to raise it further?</p>	<p>Air pollution throughout the borough is measured on a regular basis, and Air Quality Management Areas (AQMAs) have been designated in areas of particularly poor air quality. New development in these areas must adhere to <b>DES11(1-3)</b>. Beyond this, it is believed that existing policies on the protection of trees, open spaces, and green infrastructure will be suitable to offset any increase in air pollution from a greater number of cars</p>	<p>No change</p>
<p><b>Policy DES8</b> - We are concerned what remedies are available to the council if the construction management statement is not adhered to? Work being stopped on the site or small fines are a very minor deterrent to the developer. We suggest there need to be some real teeth for this policy to be worth anything.</p>	<p>When a condition of the statement is breached, a Breach of Condition Notice can be issued, and the developer can be prosecuted if this is not complied with in 28 days. See here for further information  <a href="https://www.gov.uk/guidance/ensuring-effective-enforcement">https://www.gov.uk/guidance/ensuring-effective-enforcement</a></p>	<p>No change</p>
<p><b>SC3</b> - this should be minimised to zero or a clear, objective method of measuring this impact should be defined and freely and readily published for everyone to use.</p>	<p>It is impossible to reduce the impact of a development to 'zero'. As many of the impacts of a development are related to fairly subjective measures such as annoyance, nuisance or loss of amenity, it would be very difficult to design an objective method of measuring the impact of developments.</p>	<p>No change</p>
<p>DES8 - (1) should state 'will require' rather than 'may'.</p> <p>(2) should be expanded to include reference to hours when bonfires are acceptable during demolition works and also a requirement for contractors or sub-contractors to notify the Council of where off site waste is to be deposited, in order to reduce fly tipping. There should be a</p>	<p>It is not believed that it is necessary to make construction management statements mandatory on all developments. By saying they 'may' be required, it is possible to request them for the majority of developments, while exempting the few developments where they would be an unnecessary extra burden due to the size or location of the development.</p> <p>Point 2 is noted and agreed with.</p>	<p>"g) Method of waste disposal, including notification to the Council of where waste will be deposited. If waste is to be burnt, timings</p>

<p>requirement for a 'good practice' site notice to be erected with contact numbers in case of problems.</p>		<p>for when this will occur" added to DES8(2).</p>
<p>These plans would cause total chaos in Banstead, as even a few roadworks bring the village to a standstill. Why can't developers look further afield in more open spaces that haven't got so much traffic already?</p>	<p>Our spatial strategy is based on an 'urban area first' approach. This reflects national policy guidance, and the constrained nature of the borough. The borough is comprised of around 69% of Green Belt outside the urban areas, so potential for development here is restricted. As the Council has to manage future land supply carefully to ensure that development can be delivered sustainably both now and in the future.</p> <p>It is believed that Policy DES8 provides suitable protection for local residents during construction, with the aim of minimising disruption as far as is practical.</p>	<p>No change</p>
<p>Development in Banstead will increase litter which lies on the pavements for days as it is. The council could do well to employ a full time dedicated cleaner for the High street alone.</p>	<p>This is not a matter for planning policy. However, the Council do have a dedicated street cleaning team and on the website there is the facility to report a problem including dead animals, full dog waste bins, animal fouling, leaves, overfull litter bins, litter, mud on the road (non-immediate hazard), park cleaning, road/street sweeping, traffic accident debris and needles - see the webpage here <a href="http://www.reigate-banstead.gov.uk/info/20063/street_cleaning">http://www.reigate-banstead.gov.uk/info/20063/street_cleaning</a></p>	<p>No change</p>

The only way to minimise impact on Banstead residents is by not developing the High Street.	Policy DES8 states that all developments must be managed in a safe and considerate manner, and that residential and commercial developments will most likely require a construction statement to be prepared. If this statement cannot demonstrate that a development can be completed in a way which is safe for local residents and minimises disruption as far as is practical, such a development should be refused planning permission.	No change
The entrance of building lorries/materials/lots of extra people will have a severe negative impact on the quality of life of Banstead residents.	Policy DES8 is designed to minimise these effects while still allowing the borough to meet its housing need.	No change
Minimise impacts by not going ahead with developments in already crowded areas.	Outside of existing urban areas, much of the borough is composed of greenbelt land and national policy requires us to look at urban areas first for development. Policy DES8 provides suitable protection for local residents during construction, with the aim of minimising disruption as far as is practical.	No change
We are concerned as to what remedies/penalties will be levied on those developers who do not comply with the Contract Management Statement.	When a condition of the statement is breached, a Breach of Condition Notice can be issued, and the developer can be prosecuted if this is not complied with in 28 days. See here for further information <a href="https://www.gov.uk/guidance/ensuring-effective-enforcement">https://www.gov.uk/guidance/ensuring-effective-enforcement</a>	No change
Should include traffic management on public or private roads, especially where the latter are used by the public and contractors.	Policy <b>DES8 (2)[a]</b> calls for construction management statements to address traffic management issues where this is appropriate to the likely impacts of a development.	No change



<p><b>Sc3</b> - Although the best way to minimise the impact might be not to undertake certain developments in the first place. In the case of appropriation of green belt land it's difficult to see how the damage caused by housing construction could be minimised. For the wildlife and/ or livestock or farmers who currently make use of it, development would be felt as a total destruction.</p>	<p>Reducing the impact of new developments must be balanced against the need for the borough to meet its housing need. All developments will have an impact of some sort, but not developing will also have an impact due to the requirements of national planning policy and the requirement for housing. It is believed that this plan represents the most efficient way to meet all of the borough's needs with the lowest impact.</p>	<p>No change</p>
<p><b>SC3</b> - it is necessary to strike a balance between the protection of residents and ensuring that sustainable development can proceed without onerous or unnecessary burdens placed upon them.</p>	<p>Noted and agreed - it is believed that this document strikes a balance between these two elements.</p>	<p>No change</p>
<p><b>SC3</b> - The area to the south of Reigate cannot accommodate the housing development you have planned for the future. Impacts will not be minimised. The traffic in Reigate has increased in the last twenty years and air quality has been seriously affected. Your plans to build up a town in the south of Reigate seriously affects the quality of life of everyone in the area.</p>	<p>Any planning application for a Sustainable Urban Extension (SUE) in the south of Reigate will need to demonstrate that it has considered how to overcome the traffic problems that we acknowledge exist in this part of the borough. If these are not adequately addressed, permission will not be granted. The SUEs themselves will only be brought forward for development if and when the borough cannot demonstrate a five year supply of housing land in existing urban areas, as it is required to do under national policy.</p>	<p>No change</p>

<p><b>SC3</b> - On roads in particular. The Redhill two-way conversion has pushed traffic bottlenecks out of town rather than removing them altogether. Additional housing will exacerbate existing problems in this area.</p>	<p>Any proposed developments in this area (or elsewhere in the borough) will need to demonstrate what impact they will have on the highway network and what mitigation would be required to make them acceptable. The draft DMP aims to encourage sustainable transport and to manage traffic in a sustainable manner.</p>	<p>No change</p>
<p><b>DES8</b> - the DMP should state how developments will be monitored to protect residents from the lengthy periods of disruption during construction and to ensure that all conditions are being met. Currently this does not happen satisfactorily</p>	<p>When a condition is breached, a Breach of Condition Notice can be issued, and the developer can be prosecuted if this is not complied with in 28 days. Generally, notification that a requirement has been breached comes from local residents, as it would be impractical for the Council to actively monitor all development sites in the borough. See here for further information: <a href="https://www.gov.uk/guidance/ensuring-effective-enforcement">https://www.gov.uk/guidance/ensuring-effective-enforcement</a></p>	<p>No change</p>
<p><b>DES8</b> - A construction management statement should be mandatory not optional (p64 para1). This would help to ensure working hours, deliveries, bonfires etc. can be controlled.</p>	<p>It is not necessary to make construction management statements compulsory, as Policy DES8 allows the council to require such a statement where necessary, while exempting the few developments that may not really need one due to size or location.</p>	<p>No change</p>

<p><b>DES9</b> - Developments in areas affected by noise should require triple glazing to make them 'liveable'. The policy should set an appropriate standard for such properties, such as Code Level 6 or Passivhaus construction, including passive or mechanical ventilation so that these homes are designed to be lived in without windows opening for ventilation, or differential thermal conductivity (such as from triple glazing combined with poor insulation) to prevent 'sick building syndrome'. The proposed design to address noise pollution in DES9 should be extended to relate to intermittent noise as well as average noise contours.</p>	<p>National planning policy does not allow the Council to require developers to meet Passivhaus standards or the (now withdrawn) Code for Sustainable Homes. It is also believed that specifically requiring triple glazing, even if only in areas affected by noise, would likely be considered to contravene national policy, as it would be considered unnecessarily prescriptive. Consequently, the policy as currently written requires developers to demonstrate that they have addressed noise issues, but does not mandate them to do so in a specific way. The issue of intermittent noise is covered by <b>DES9(2)</b>, which states that noise-sensitive uses (for example, residential units) should only be located near existing sources of noise if mitigation measures can be put in place to reduce noise exposure to acceptable levels.</p>	<p>No change</p>
<p><b>DES9:</b> It is expected that the Council will observe statutory requirements for avoidance of industrial pollution. There is an obvious health concern about pollution in Horley near to Gatwick airport. It is more difficult to deal with pollution from motor traffic particularly near to busy main roads and their signal controlled intersections. There should be regular monitoring of pollution levels at points along these routes where development is contemplated. The Council must be vigilant and make the survey results publicly available.</p>	<p>The Council regularly monitors air quality in the borough, and this data is publicly available. The Council observes all statutory requirements. More information can be found on air quality here: <a href="http://www.reigate-banstead.gov.uk/info/20333/air_quality">http://www.reigate-banstead.gov.uk/info/20333/air_quality</a></p>	<p>No change</p>

**DES9** - GAL broadly supports proposed policy DES9 but suggest that it is made clearer within the proposed policy that new development would only be permitted where the maximum noise metric for exposure to aircraft related noise would 57 dBa for the occupants /users of the new development. The inclusion of this noise metric threshold would strengthen the proposed policy DES9, provide greater clarity for both developers and future occupants of such dwellings/developments. It would also positively contribute towards the creation of a more sustainable pattern of development in the Borough and be in line with good planning practice.

Noted and agreed that the policy could be made clearer - it has been rewritten to make the 57dB threshold for development clearer, with development only permitted in areas within the 57dB noise contour if it can be demonstrated that mitigation can take place to reduce noise levels below the significant adverse impact level.

**DES11** rewritten to make clear that developments within the 57dB contour must demonstrate that mitigation is possible to reduce noise below the significant adverse impact level.

CONTROL OF ADVERTISEMENTS & SHOP FRONT DESIGN		
<p>DES10(3) - The policy should be terminated after 'inappropriate', as these adverts can be disturbing in residential areas, particularly at night.</p>	<p>Noted - the policy has been amended to make it more restrictive with regards to high level brilliantly illuminated, neon or flashing advertisements or advertisements with moving parts</p>	<p><b>DES10 (5)</b> updated to read: "High level brilliantly illuminated, neon, or flashing advertisements, or advertisements with moving parts, will not normally be permitted. supported and will generally be considered inappropriate in Conservation Areas, and on heritage assets, and in primarily residential areas."</p>
<p><b>DES10</b> - Acceptable, except for paragraph 3. We would prefer this to read "will generally be considered inappropriate in all residential neighbourhoods, as well as heritage assets".</p>	<p>Noted - the policy has been amended to make it more restrictive with regards to high level brilliantly illuminated, neon or flashing advertisements or advertisements with moving parts</p>	<p><b>DES10 (5)</b> updated to read: "High level brilliantly illuminated, neon, or flashing advertisements, or advertisements with moving parts, will not normally be permitted. supported and will generally be considered inappropriate in Conservation Areas, and on heritage assets, and in primarily residential areas."</p>

<p><b>DES10</b> - The remit of this should include activities of landlords/letting agents for both commercial and residential properties and require advertisements to be removed once dwellings have been let. In some blocks of flats it is common for 'to let' boards to be permanently in place, including when there are no vacancies. This should be written into the policy and made enforceable.</p>	<p>There are currently no plans to include such a policy, as enforcement would be unnecessarily costly and time-consuming when weighed against the impact of the advertisements. However, paragraphs 67 and 68 of the National Planning Policy Framework do allow for the Council to control to-let boards if it can be demonstrated that there are areas where these advertisements are having an impact upon visual amenity and public safety, where there is no other way of effectively controlling such advertisements, and where proper consultation has taken place.</p>	<p>No change</p>
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OPEN SPACE		
<p>We do seem to lack outdoor activities in the area for the older children (there are many impressive play areas for younger children which is great). What about safe cycle routes (not on or crossing major roads) how about outdoor water sports (canoeing, sailing etc...) or even dry ski slopes and ice rinks.</p>	<p>Outdoor sports provision like sailing or skiing would be matters for private businesses to bring forward. The DMP is mainly concerned with new development, and requires that new development incorporates pedestrian and cycle routes within and through the site. Whilst large scale development can sometimes require improvements to the surrounding area to improve the accessibility of a development, this is on a case by case basis. New cycle routes on existing roads are otherwise the remit of Surrey County Council - see the following website for more information <a href="https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-">https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-</a></p>	

	transport-plan-strategies/surrey-cycling-strategy	
Open space around housing and retail development is important. Its quality depends on maintenance after the development is complete. Existing allotments must be protected even at a time when demand is temporarily low. The possibility of including new allotment space in developing areas should be considered.	It is agreed that allotment space is valuable and should be protected and encouraged where possible. Reference to maintenance also inserted	New clause NHE4(1)[f] added to give more protection to allotments.  Reference to maintenance
OSR2(4) - It is hoped that in the case of urban extensions there will be a master plan showing recreation, and other biodiversity requirements/green corridors, so that provision is not on a site by site or case by case basis.	This is what the policy already refers to - in the case of each urban extensions, a development brief (i.e. a masterplan) will be set out to cover these issues.	No change
<b>OSR2</b> - Whilst we welcome the provision of public open space, we consider that this should be judged on a site by site basis, as inevitably town centre locations, which are more likely to be constrained in extent and warrant greater density of development, may not be likely to meet this policy provision in principle. We do not agree that all new housing developments should be expected to make the same provision for public open space, children's play and outdoor sport facilities set out in proposed policy OSR2. We consider that the provision of this quantity of open space in town centre locations would be too onerous given that town centre locations are often of limited space.	This is why the policy refers to 'exceptional circumstances' in which a financial contribution may be required for the creation or upkeep of open spaces elsewhere in the borough, ensuring that developments in town centres can still contribute to the open space needs of the borough.	No change

<p><b>East Redhill</b> - What provision is being made for green spaces in any proposed new development east of Redhill? My feeling is that the result is likely to be high density housing with little open space</p>	<p>The requirements for open space in new developments are set out in Policy OSR2.</p>	<p>No change</p>
<p>The plan should seek to maintain a green space between Horley and Crawley.</p>	<p>Noted - the policies currently in the DMP draft aim to maintain existing green spaces and provide new ones where necessary. This includes "retention of an appropriate strategic gap between Horley and Gatwick airport" (p.191 of the draft document).</p>	<p>No change</p>
<p>Greenacre School should be designated UOS. The expansion of the school has already led to an increase in traffic.</p>	<p>Greenacre School was screened out at an early stage of the Open Space Review process due to a limited outdoor space aspect. The urban open space designation cannot be given to sites purely to stop expansion of an existing amenity, if development is sought which would result in unacceptable impacts, this will be assessed through a planning application</p>	<p>No change</p>
<p><b>OSR1</b> - in some cases allowing some devt to enable the urban open areas to be accessed to the public or improved for public benefit should be recognised as an exception. I believe on the Warren at Kingswood at appeal this reason was accepted</p>	<p>This is correct - the appeal at Kingswood Warren was granted partly because of the improved public access to urban open land. However, it is believed that this possibility is already covered in the policy by OSR1(1).</p>	<p>No change</p>



<p>OSR2: It is unclear what will be the situation if recreation land is lost in development areas, especially as some areas in the Borough are already deficient in recreation facilities.</p>	<p>For recreation land which is not covered by the Urban Open Space designation, National Planning policy states that "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</p> <ul style="list-style-type: none"> <li>• an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</li> <li>• the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</li> <li>• the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</li> </ul> <p>If recreational land designated as Urban Open Space exists in areas earmarked for new development, the loss of such land would be covered by Policy OSR1.</p>	<p>N/A</p>
<p>OSR2(1) - We are aware of locations where local play areas have gone out of use. If part of a planning permission, a maintenance agreement should ensure amenity space is retained.</p>	<p>This issue is already covered in OSR2(3).</p>	<p>N/A</p>
<p>OSR 3: We support this policy although suggest there is also a reference to noise in 2) and that visual intrusion also covers lighting.</p>	<p>Noted and agreed.</p>	<p>"light pollution and noise" added to OSR3(2)</p>

<p>All open space should be retained, and, where possible, extended. People enjoy the open spaces, it is these that enhance the local character NOT well designed developments.</p>	<p>The importance of maintaining open space is fully recognised. However, it would be impossible under national policy to maintain an absolute ban on any development taking place on open spaces. As such, local policies seek to protect open spaces in the first instance and maintain open space in the borough to the greatest degree possible. Where the loss of open space can be justified in line with national planning policy and local criteria, our local policies require that development always make the best use of land with the lowest possible negative impacts. Well-designed developments are important for enhancing the local character, and our policies look to secure appropriate provision of open space connected with new development.</p> <p>In some instances, if there is private land which was not accessible to the public, new development could require this to be opened up to the public and new open space created.</p>	<p>N/A</p>
<p>There is already enough outdoor sport provision in Banstead.</p>	<p>The plan does not specify that additional sports provision will be built in Banstead.</p>	<p>N/A</p>
<p>All current UOS and UOL designations should remain unchanged to retain green space.</p>	<p>It is important to ensure the designations for land are up to date to ensure they can be defended if challenged. If pieces of land that do not qualify as urban open space anymore are granted that status regardless, purely because they have been given it in the past, they can be challenged by developers,</p>	

	potentially calling into question all open space designations in the borough.	
Confusion about the difference between UOL and UOS designations.	Urban Open Land is the name given to the spaces in the previous local plan; Urban Open Space is the name they are given in the new local plan. They are essentially the same thing, and when the UOS areas are confirmed the UOL designation will cease to exist.	N/A
Horley needs to maintain some open spaces to provide opportunities for relaxation.	Noted and agreed - the policies in the draft DMP document aim to deliver this. Also see the Urban Open Space review for more information.	N/A
The AGLV and parks in Reigate should be protected and retained.	The DMP contains proposed policies to achieve this.	No change
<b>SC4</b> - Absolutely but also protect non residential areas so that there are natural open and larger spaces of beauty.	These issues are covered by policy NHE1 and Policy CS2 of the Reigate & Banstead Core Strategy (2014) which covers valued landscapes and the natural environment	N/A
Open space like the station car park oh they want to build more rabbit hutches there...	Car parks are not considered as open space. National policy defines open space as "All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity" (NPPF, glossary)	N/A

<p>Yes. more open space is needed, but not just golf clubs. There must be new parks and public green areas.</p>	<p>This is noted and agreed, and already covered in the existing policies, which call for particular kinds of open space in new developments - not all of which could be met through golf courses. See policies ORS2 and 3.</p>	<p>N/A</p>
<p>Essential to maintain open space in new development areas to encourage and retain the wildlife already in existence and for recreational use of those who move to the newly developed area.</p>	<p>This is covered in Policy OSR2.</p>	<p>N/A</p>
<p>Merstham - Protect amenity Land, Mansfield Drive and Land at Hildenly Close, green spaces are fundamental in densely populated areas</p>	<p>This land is proposed as urban open space in the draft DMP. See the Urban Open Space Review for further information.</p>	<p>N/A</p>
<p>Open space as part of new development should be a default requirement</p>	<p>This is covered in Policy OSR2.</p>	<p>N/A</p>
<p>We are concerned about the amount of open fields, farming land and green belt across the Borough at risk under these proposals particularly as in reality they are more attractive to developers financially than brownfield sites.</p>	<p>The vast majority of the borough is still protected greenbelt land (around 70%) and the current DMP draft proposes building on only a small amount of greenbelt land, and only if and when a five year housing supply cannot be demonstrated in existing urban areas, so it is not up to the developer if these come forward or not.</p>	<p>No change</p>

Para 73 of the NPPF requires that: "Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative deficits or surpluses of open space, sports and recreational facilities in the local area." Sport England notes that the Council relies on an Open Space, Sport and Recreation Assessment from August 2011 as their evidence base to support their approach. Sport England does not consider this is an up to date and robust assessment of the local authority area's sporting needs. Sport England strongly recommends that the Council undertake a playing pitch strategy (PPS) as well as assessing the needs and opportunities for sporting provision. Without a robust assessment of need in place in the form of an up-to-date PPS and/or sports facilities strategy, there is no evidence that new sport, leisure and recreational facilities are required. Therefore, whilst Sport England supports the protection of existing sports facilities, there is a risk that any policy may be open to challenge and deemed unsound on the basis that it is not fully justified.

Sport England is concerned about part of the policy OSR1, specifically 2a)iii. This paragraph indicates that the loss of open space will be accepted where an expansion of an existing school is proposed and the need for school expansion is considered to outweigh the loss of playing field land. This proposed policy is not in accordance with para 74 of the National Planning

The point about specifically mentioning playing field land in OSR1(2) is noted and agreed with. However, it is felt that the policy of OSR1(2)[a]{iii} is acceptable under the NPPF, as paragraph 72 makes clear that great weight must be given to the expansion of schools. Consequently, it is appropriate to refer specifically to school expansion in this policy, as it is one of the few exceptional circumstances in which the loss of UOS or playing field land will clearly need to be considered. At the same time, the policy makes it clear that the need for the expansion will have to clearly outweigh the benefits of maintaining the UOS or playing field, so the policy does not provide a justification for simply deleting playing fields.

To inform the Regulation 19 Development Management Plan an updated Open Space, Sports & Recreation Assessment has been undertaken which includes provision for outdoor sports pitches.

Open Space, Sports, and Recreation Study; "or playing field land" added to OSR1(2).

<p>Policy Framework or Sport England’s national planning policy statement – A Sporting Future for the Playing Fields of England. Sport England is a statutory consultee on proposals for development which affect playing fields, land used for playing fields at any time in the last five years which remains undeveloped, or land which is identified for use as a playing field in a development plan. Sport England will oppose any development on playing field land in all but exceptional cases. It does so because the loss of any part of a playing field may represent the irretrievable loss of an opportunity for participation in pitch sports, and with it the many benefits which sport brings. Sport England therefore considers that 2a)iii should be amended to remove: “.....or the expansion of an existing school,....”; or amended to make clear it does not apply to playing field land as defined in the 1996 Order.</p> <p>Furthermore, Sport England considers that the proposed policy (OSR1) could benefit from including specific reference to playing field land as a typology of open space land for the avoidance of any doubt. This could be achieved by a simple amendment to paragraph 2 of OSR1.</p>		
<p>Playing pitch strategy to be undertaken School and sport provision - This is a key area we have embarrassing council sports facilities compared to every other borough. Would be nice for physical activity to be supported</p>	<p>This comment has been noted. To inform the Regulation 19 Development Management Plan an updated Open Space, Sports &amp; Recreation Assessment has been undertaken which assess the quantity, quality and accessibility of all</p>	<p>No change</p>

More provision for activities is considered in Horley, e.g. a running and cycle out door track like Preston Park, Brighton.

facilities within the borough.

The report used recommended national criteria to assess the quality of the sites and found that all of the outdoor sports facilities within the borough were of a good quality (apart from Redhill United Church Tennis Courts which are currently not used). The report however noted that there was variation in terms of parking, dog fouling, benches, bin provision and litter and recommended that when opportunities arise improvements should be made.

In terms of the provision of outdoor sports, the report finds that overall there is no need to provide additional publicly accessible outdoor sports when applying the recommended Fields in Trust Standards, however, it does not vary in provision noting that there is a need for 35ha in the south of the borough and 41ha in the north. Given the nature of the built up area, the report recognises that it is not possible to provide this level of provision and therefore recommends that opportunities should be explored to provide outdoor sports within existing open spaces such as recreation grounds, within the wider countryside and urban fringe and that opportunities should be explored to allow public access to facilities which are not currently publicly accessible. Policy HOR9 requires the provision of at least 5ha of open space including outdoor sports - this will help to reduce the deficit.

In terms of providing new facilities within existing facilities (i.e. recreation grounds) in Horley, it is more complicated as the Town Council own and manage a number of the sites.

**Banstead** - We have no outdoor sports centre in Banstead and poorer people cannot get to Redhill. There is a distinct lack of artificial sporting surfaces in the Horley area, meaning local residents and specifically children are not able to access sporting activities and stay healthy. Add something into the Horseshoe development.

This comment has been noted.

To inform the Regulation 19 Development Management Plan the Council has updated its 2011 Open Space, Sport & Recreation Assessment.

For indoor sports, the report found that there is no need to provide additional indoor sports facilities for the borough and noted good accessibility for borough level facilities, relatively good accessibility for local level facilities but more limited accessibility for neighbourhood level facilities. The report recommends that all of the existing facilities should be retained, that the council should work with partners to increase public access to existing facilities and when opportunities arise, opportunities should be explored to provide new facilities.

In terms of outdoor sports pitches, the report identified a surplus of pitches for the borough as a whole but identified the need to provide 22.2ha within the south of the borough by 26/27. The report recognised that the existing characteristics of the borough limit the ability to provide this amount of outdoor sports and instead recommends that opportunities should be explored to provide pitches within existing open spaces such as recreation grounds, within the wider countryside and urban fringe and opportunities should be explored to allow public access to facilities which

No change



	<p>currently have no public access. Policy HOR9 seeks to provide at least 5ha of high quality open space including outdoor sports provision within Horley. In terms of artificial pitches, the report does not distinguish between the types of pitches.</p>	
<p><b>Horley - THE COURT LODGE FEILDS COULD DO WITH A DESIGNED SKATE PARK AND FACE LIFT - THERE IS VERY LITTLE FOR KIDS AND YOUND ADULTS TO DO</b></p>	<p>This comment has been noted. To inform the Regulation 19 Development Management Plan an updated Open Space, Sports and Recreation Assessment has been undertaken which looks at the quality, quantity and accessibility of facilities. The report used national recommended criteria to assess the quality of Court Lodge fields and found it to be good. For outdoor sports in general, the report recommends that the quality of the existing facilities should be improved as an when opportunities arise. In terms of the provision of a skate park, the report identifies a need for an additional 2.15ha of young people provision (including skate parks) in the south of the borough and recommends that opportunities should be explored to provide facilities when opportunities arise. In terms of Court Lodge Playing Fields, Horley Town Council manage the facilities and would need to make a decision as to whether they feel that a skate park should be provided. Horley Town Council has recently worked with the Borough Council to provide a skate park in Horley Recreation Ground.</p>	<p>No change</p>

<p><b>Horley</b> - There is a distinct lack of artificial sporting surfaces in the Horley area, meaning local residents and specifically children are not able to access sporting activities and stay healthy. Any development in the area needs to include provisions for access to sporting facilities. With a growing youth population and it's position as a young family commuter area, it is vital that our young people have ease of access to locations where they can take part in structured sporting activities. In the Horley area there are NO artificial surface sporting facilities, the closest being Redhill and Crawley. This means that the sizeable population in the area have no access to this type of sporting facility without incurring an environmental impact through travel. This need to travel impact the youth population especially, who are reliant on the motivation of adults to take them to these sporting venues regularly if they are to participate in organised team sports.</p>	<p>This comment has been noted. The Open Space, Sports &amp; Recreation Assessment has been updated to inform the Regulation 19 Development Management Plan. This has looked at the quality, quantity and accessibility of existing facilities within the borough and used national standards and population projections to estimate the need for new provision for 2026/27. The report looks at the need for outdoor sport including pitches and concludes that there is a surplus of 27.5ha of pitches in the borough as a whole but a need for 22.1ha in the south of the borough. The report recognises that in reality it is not going to be possible to provide this amount of pitches due to the nature of the built up area. Instead, it recommends that opportunities are explored to provide facilities within existing open spaces i.e. recreation grounds, within the wider countryside and urban fringe and opportunities are explored to allow public access to facilities which currently have no public access. Policy HOR9 seeks to provide at least 5ha of open space and sports provision. The report does not look into the type of pitch provision (i.e. 3G/ artificial/ grass).</p>	<p>No change</p>
<p>The Horley area would benefit from more schools and leisure facilities with open green spaces for all residents and new homes.</p>	<p>Noted. More information of what has occurred to date can be found on this website <a href="http://www.reigate-banstead.gov.uk/info/20326/horley">http://www.reigate-banstead.gov.uk/info/20326/horley</a></p> <p>To inform the Regulation 19 Development Management Plan an updated Open Space, Sports &amp; Recreation Assessment has been undertaken which looked at the quality, quantity and accessibility of current facilities and the need for new facilities against</p>	<p>No change</p>

	recommended standards. For Horley for both indoor sports facilities and amenity green space the report identified surplus in provision against national standards but recommends that this should not be eroded.	
<b>Banstead</b> -Concern at the possible loss of UOS in the Horseshoe (site 22) without a detailed assessment of the value of the green corridor and mature trees compared with the development potential.	The fields have been removed from the site allocation.	Removal of playing field area from site BAN2.
<b>Banstead</b> - A wildlife area or other park should be incorporated into the Horseshoe, encouraging locals to help in its development. The one in Bolters Lane is tiny and can not be developed and gardened by locals.	There is rather limited space for a wildlife area within the Horseshoe, but a new Local Nature Reserve has recently been opened in Banstead.	No change
Again leisure facilities should be provided by the Council. Not developers as planning gain.	The funding of leisure facilities is obviously a difficult issue at this time, due to limited funding from central government. Funding facilities through planning gain, where there is an identified need, allows the borough to meet its housing targets while also providing local facilities for residents.	No change
With regard to sports and leisure facilities, including football clubs and golf clubs, they should have to justify any proposals to relocate club houses, maintenance sheds and other facilities or expand onto Green Belt, Common Land or other protected areas. There has been a tendency in planning to follow the Tesco route of moving buildings and uses around for development gain and we believe it is up to the Council to ensure its policies protect the community better against this problem which does not benefit the ratepayer.	Any form of development in the green belt will have to adhere with national policy and with proposed DMP Policies including Policy NHE5.	No change

<p>OSR 1 - We support the policy but suggest that applicants must be able to show that they have tried to seek uses compatible with (1) before seeking a form of development which will lead to loss of UOS, as set out in (2a). For example, there are no allotments in Tadworth and Walton for which there is a local demand. Elsewhere there are deficiencies in the provision of playing fields.</p>	<p>It is felt that the requirement for exceptional circumstances to justify the loss of UOS is sufficient, without also requiring developers to demonstrate that they have actively tried to seek uses that will improve UOS - clause 1, after all, states that proposals that enhance UOS will be looked at favourably, not that this is a requirement for all development. In terms of playing field provision, an open space, sport, and recreation assessment has been undertaken to identify areas of the borough that are deficient in these and other facilities - this allows the council to identify areas where additional playing fields will have the most benefit.</p>	<p>No change</p>
<p><b>OSR2</b> - Criteria 2 of this policy states that the Council may, in exceptional circumstances, negotiate a financial contribution to secure off-site provision of public open space, children play and outdoor sports facilities.</p> <p>However, with reference to the Council's most recent Developer Contributions SPD (2016), page 13 of this document states that the most appropriate mechanism for collecting, will be via CIL contributions.</p> <p>Summary recommendation: The mechanism via which financial contributions towards open space will be collected should be more clearly specified and should conform with the Council's evidence base documents, in order to ensure greater developer certainty on viability from the outset.</p>	<p>The Council's CIL Regulation 123 list (our formal statement of how CIL and s106 will be used) explains that CIL will be used to secure leisure, open space and outdoor sport and recreation, except where this is required by policy to make a development acceptable in planning terms. Policy OSR2 is consistent with the SPD, because the latter states that planning obligations/conditions might be used 'exceptionally on strategic scale housing developments'. Essentially, small scale housing development will not be required to provide these amenities, but the CIL contributions collected from them may be put towards such amenities; housing developments of the scale referenced in OSR2 may have planning conditions/obligations attached to secure the provision of amenities. It is believed that this provides a suitable level of certainty for developers.</p>	<p>No change</p>

<p><b>OSR2</b> - Although this policy is generally acceptable, it does not make allowance for areas that already benefit from good provision of public open space. Areas such as Merstham have been identified as having a significant level of open space and as such it may not be completely necessary for surplus provision to be provided. We therefore consider that each development and the required level of public open space should be assessed on its own merits with due consideration given to the level of existing provision in the locality of the site. It should be noted that the Sustainable Urban Extensions Technical Report (June 2016) identifies that in the east of Merstham area there is currently a significant local oversupply of amenity green space with Table 13 of the document stating that new provision is not a priority in the area.</p>	<p>The policy currently makes reference to 'exceptional circumstances' in which a financial contribution for offsite open space may be acceptable. This may be the case in areas where there is a relative oversupply of existing open space, and ensures that development contributes to the quality of life in the borough as a whole.</p>	<p>No change</p>
<p><b>OSR 2</b> - It is unclear what will be the situation if recreation land is lost in development areas, especially as some areas in the Borough are already deficient in recreation facilities.</p> <p>1) we are aware of locations where local play areas have gone out of use. If part of a planning permission, a maintenance agreement should be part of the planning permission to ensure amenity space is retained.</p> <p>4) It is hoped that in the case of urban extensions, there will be a master plan showing recreation, and other biodiversity requirements/ green corridors, so that provision is not on a site by site or case by case basis. We object to this part of the policy as worded.</p>	<p>Ongoing maintenance of such spaces is covered by OSR2(3). The Sustainable Urban Extensions will be taken forward on a case-by-case basis, as and when the borough cannot demonstrate a five year housing land supply as required under national policy. Under such a phased approach, it would be unduly arduous to produce a full advance masterplan for sites that may not ever be needed for housing development; however, OSR2 requires open space details should be set out in a development brief where relevant.</p>	<p>No change</p>

<p><b>OSR2</b> - In paragraph 2, off site provision might work in purely land accounting terms but it could be anathema to the concept and value of an OSR as described in the comments about OSR1 above. The provisions in paragraphs 3 and 4 must be strong enough to guarantee these.</p> <p>The document proposes the release of urban open space for development. The land proposed to the north of the Horseshoe at Banstead is precisely defined but one cannot comment on this proposal without knowing, in precise terms, what this would be used for. The map in the document is not sufficiently legible for public comment.</p>	<p>The explanation of the 'exceptional circumstances' in which off-site open space provision will be allowed are explained in the 'reasons' section underneath the policy. The draft DMP document does not aim to provide precise descriptions of what development will take place, but only to identify land which has the potential to be developed. Nevertheless, the area of UOS to the north of the Horseshoe has been removed from site BAN2.</p>	<p>Removal of UOS from boundaries of site BAN2.</p>
<p><b>OSR2</b> -, the following amendments are required to be made in order for Policy OSR2 to be consistent with the NPPF: The inclusion of per hectare open space size standards is too prescriptive, and contrary to NPPF Paragraph 14 which requires policies in Local Plans to include sufficient flexibility to respond to rapid change. Whilst it is understood that the standards are based on RBBC's current projections of need, the policy is required to endure for the balance of the Plan period to 2027. It is conceivable that the population projections could materially change in the remaining 11 years, necessitating an amendment to open space requirements. The specific standards stated in Proposed Policy OSR2 should therefore be deleted. We suggest that it would be sufficient instead to expand Proposed Policy ORS2, point 3) to read as follows:</p> <p>3) Any provision made as part of new developments</p>	<p>It is believed that the space standards included in the draft DMP are appropriate. They are based on national standards and guidance, as is explained in the 'Reasons' section of OSR2, and are therefore not dependent on population projections remaining consistent across the plan period - although it is believed that changes to population projections are unlikely to fluctuate too significantly across a range of only 11 years.</p> <p>There are no requirements for sites below 25 units, so they do not need to be included in the policy; the point about 'large housing sites' is noted and the policy has been rewritten to exclude this.</p>	<p>Rewrite of policy to remove reference to 'large housing sites'</p>

<p>will be expected to meet relevant prevailing standards used by the Council relating to the size, type and quality of open space provision, be designed as an integral part of the development and include appropriate measures for on-going management and maintenance.</p> <p>If RBBC concludes that specific open space standards are to be retained in future drafts of Policy ORS2, then for completeness any requirements for sites under 25 dwellings should also be included. At Policy Approach ORS2, point 4) no definition of 'large housing sites' is given. This should be clarified.</p>		
<p><b>OSR2</b> - We note the reference in criterion 4) of OSR2 that open space requirements on large housing sites including urban extensions will be established on a case by case basis "and set out in a development brief". As set out below in our response to Policy INF1, our client is committed to engaging positively with the Council as part of the DMP process to establish masterplanning principles and infrastructure requirements, and through pre-application engagement to consider more detailed issues including the requirements for open space. We therefore object to the requirement for a development brief to be prepared.</p>	<p>While it is accepted that your client may very well be willing to work with the council in a more informal manner in good faith, taking this requirement out of the policy would require an assumption that all developers will behave in the same manner.</p>	<p>N/A</p>
<p><b>OSR2</b> - We understand this is broadly consistent with the national playing field standards. Please can the Council confirm that this standard is in line with or exceeds national standards?</p>	<p>Yes, it is in line with national standards.</p>	<p>No change</p>

<p><b>OSR2</b> - It is the function of the Local Plan to determine how much public open space is required on large housing sites. It is not appropriate to address this on a case by case basis. The local plan should remove ambiguity so that applications can be determined without delay. It is inappropriate for the Council to treat the local plan as the starting point for negotiation. This is contrary to the NPPF.</p>	<p>The policy sets out minimum standards which allow for higher levels of open space should this be considered appropriate. 2) also allows for situations where open space cannot be provided on the site</p>	<p>N/A</p>
<p><b>OSR2</b> It will be important to ensure that new development also makes a contribution to new indoor sports facilities or to improvements of existing indoor facilities if appropriate. Sport England considers that a separate, additional policy should be drafted which relates specifically to adequate provision of indoor sports facilities to meet demand generated by new housing development. Sport England notes the use of standards within policy OSR2 to calculate the amount of outdoor sport provision. However, Sport England does not support a standards-based approach and considers that the approach should be underpinned by an up to date and robust assessment of need in the form of a Playing Pitch Strategy and Built Facilities Strategy. Sport England strongly recommends that such assessments are undertaken.</p>	<p>This comment has been noted. To inform the Regulation 19 Development Management Plan an updated Open Space, Sports &amp; Recreation Assessment has been undertaken and these standards are based on this report. In terms of indoor sports provision, using Sport England's Active Places Power Calculator, the assessment notes that there is no need for additional facilities. The report recommends that all of the existing facilities should be retained; that the Council should work with partners to increase public access to existing facilities and that when opportunities arise opportunities should be explored to provide new indoor sports facilities.</p> <p>The fact that Sport England has design guidance available will be referenced in the 'Reasons'.</p>	<p>"Design guidance for sports facilities is available from Sports England" added to OSR3 Reasons.</p>
<p><b>OSR3:</b> Generally acceptable. There seems to be a presumption in paragraph 3 that sport and recreation facilities could be designated within the Green Belt. Is this correct?</p>	<p>The National Planning Policy Framework (paragraph 89) makes clear that "appropriate facilities for outdoor sport [and] outdoor recreation" are suitable uses of the green belt - consequently, it is correct that sport and</p>	<p>N/A</p>



	recreation facilities could, theoretically, be built in the green belt.	
<b>OSR3</b> - We support the criteria which is to be used to assess the acceptability of proposals for new or upgraded outdoor sports and recreation provision. The criteria seeks to ensure that the design of new open spaces responds positively to local character and circumstances and protects neighbouring amenity. This approach fully accords with the design-led principles of the NPPF, and in particular Paragraphs 56-59 and Paragraph 123.	Noted.	N/A
<b>SC4</b> - What is valuable? Priory park- yes. Some scrappy farm land covered in rusty farm machinery - no	Noted and agreed - the urban open space assessment undertaken as part of the evidence base for the consultation has attempted to identify which areas of open space are more valuable based on criteria including accessibility, character, and environmental considerations.	N/A
Paragraph 74, provision for sports is great but shouldn't exclude for example people who would like to walk their dogs or cycle their bikes. These people shouldn't be ignored when working out the amount a space is used. Who is it who decides an open space is 'surplus to requirement' surely that is very subjective?	The paragraph referred to is actually part of national planning policy, and therefore unalterable by the Council alone. The importance of walking and cycling is recognised elsewhere in both national policy and the draft DMP document (such as policies TAP1, NHE4). The assessment of open space is indeed somewhat subjective, which is why the Council has undertaken an urban open space assessment to determine which open spaces best meet certain criteria related to access, character, and environmental considerations.	N/A

<p>There is nothing in the document about informal recreation and the value of protecting and enhancing parks and common land.</p>	<p>Policy OSR1(1) states that proposals which enhance the use of land for recreation will be granted; NHE2(1)[b] discusses the importance of direction recreational uses away from vulnerable areas of the SAC that need protection; a further discussion of the actions to be taken to protect and enhance the borough's parks is included in the green infrastructure strategy.</p>	<p>N/A</p>
<p><b>SC4</b> - Not just actual sites but also views. There is a reason many of us don't live in larger towns and urban areas</p>	<p>Policy NHE1 seeks to protect specific views and landscapes, as does DES1 which also seeks to protect the amenity of all. However, the courts in general have taken the view that planning is concerned with land use in the public interest, so that the impact of a development on the value of a neighbouring property or loss of private rights to light could not be material considerations and not comprise a reason to reject a planning application, although more cumulative impacts on public views could be.</p>	<p>N/A</p>

<p><b>SC4</b> - Redhill in particular needs more open spaces not less. Do the residents of Redhill want to be an extension to Horley and Hooley or do we want an more defined boundary surrounded by countryside and Green Belt? I think the answer is yes?</p> <p>The Green Sands Way Ridge between Tandridge and Redhill is an important geological feature. Tandridge Council has designated the ridge between Tandridge and Nutfield an area of outstanding natural beauty and a special nature reserve. Reigate and Banstead should be urged to the same. Currently the view from the flat area between Horley and Redhill is full of the beauty of the ridge and the green space on the hill side. Any proposed development will have a devastating effect on this beautiful place.</p>	<p>The current plan in no way proposes joining Redhill to Hooley or Horley, and aims to maintain a strongly defined greenbelt boundary around all towns in the borough, while accepting the need to potentially use small amounts of green belt land for development if and when the council cannot demonstrate a five year housing land supply as required under national policy.</p> <p>With regard to the discussion of the greensand ridge: all development proposals within or adjacent to the AONB will have to comply with policy NHE1, which states that great weight will be attached to the impact of the development on the AONB, and that developments should be in accordance with the AONB Management Plan. The AONB boundary is also currently undergoing a review. Consequently, it is not felt that specific protection is needed for the greensand ridge in this document, although its importance is noted - it is believed that elements worthy of protection will be covered by the existing policy. It is worth noting that the review referred to does not suggest the Greensand Ridge in Reigate &amp; Banstead be considered for an extension of the AONB, and the AONB board did not raise any issues around this area in their own consultation response.</p>	N/A
<p><b>SC4</b> - policy and criteria required for defining and determining 'most' category</p>	<p>These are set out in the Urban Open Space Assessment that formed part of the evidence base available on the Council's website</p>	N/A

<p><b>SC4-</b> Within the borough generally, not just in the urban areas. Out of town open spaces are just as valuable</p>	<p>These are covered more suitably in the greenbelt and landscape sections of the DMP.</p>	<p>N/A</p>
<p><b>SC4</b> - 'Valuable' is the key word here. Open spaces which perform a function i.e. either visually or from a use perspective should be protected. Sites which may be 'open' but clearly serve no useful purpose need not be protected and could be put to productive use. This should not however be used as an excuse to oppose the principle of new homes in the borough, which is an essential response to the wider national crisis of a lack of supply of affordable housing.</p>	<p>The draft DMP aims to meet the housing needs of the borough, not to oppose meeting those needs. However, policies on issues like urban open space are needed to ensure that quality of life of existing and future residents is not compromised. An urban open space assessment has been carried out to identify open space considered to need specific protection, this forms part of the evidence base available on the Council's website</p>	<p>N/A</p>
<p><b>SC4</b> - TPO's must, must be put on all mature trees. For every home, five trees must be planted. Enlarge and enhance our "greenbelt" to riverside areas. Management of all local open space should be given to the Town Council. Wildlife habitats must be provided and protected.</p>	<p>Habitats are protected under Policy NHE2 on biodiversity. TPOs will be put on all trees that are felt appropriate for such a designation, but a blanket designation would be unlikely to accord with national planning policies. Policy NHE3 also gives protection to trees of value that do not have TPOs on them. Developers are expected to provide green infrastructure when creating new developments, but this can be done in a variety of ways beyond setting a generic number of trees to be planted. It is unclear why management of local open spaces should be given to the town council (presumably referring to Horley Town Council). The green belt already takes up almost all non-developed space in the borough, and extending it further would potentially reduce the borough's options for meeting its housing need in the future - as well as being difficult to achieve under national policy.</p>	<p>N/A</p>

<p><b>SC5</b> - all people need outdoor space &amp; sports / healthy pursuits should be actively encouraged, people must not be left feeling cooped up indoors with nowhere to go outside</p>	<p>Noted and agreed. This is what proposed policies seek to achieve</p>	<p>N/A</p>
<p><b>SC5</b> - Is this just creating a 'park' in a housing development that does not service the wider community.</p>	<p>The open space referred to in these policies is expected to be public open space.</p>	<p>N/A</p>
<p><b>SC5</b> - Will only work if new outdoor sport facilities are financially supported by the council. Open spaces need to be linked as wildlife corridors.</p>	<p>The point about open spaces being linked is somewhat covered by the concept of green infrastructure in policy NHE4, but the requirement for green spaces to be linked can be drawn out further in that policy. Policy OSR2(3) is clear that ongoing management and maintenance provision needs to be made for new open spaces, including new sports facilities.</p>	<p>A reference to the importance of linking green infrastructure up has been added to NHE4(2)(c)</p>
<p><b>SC5</b> - These will however only be small areas of greenspace within developments. These developments are being built on land that is known to flood. Who is going to help the community when their houses are ruined by flood water?</p>	<p>This policy is concerned with open space, rather than green space <i>per se</i>. However, the DMP also contains a policy (CCF2) explaining the approach to flood risk and new developments.</p>	<p>N/A</p>
<p>SC5 - Agreed, however you don't go far enough. New development needs to support the entire community infrastructure. Developers should pay their fair share of the added need. This includes expanding local schools, GP practices etc.</p>	<p>While the point is noted, this section of the plan deals with the built and natural environment, not with social infrastructure.</p>	<p>N/A</p>
<p><b>SC5</b> - Policies should also have regard to the amount and proximity of existing open space to any development proposed. Some flexibility regarding on site provision should be provided where existing open space is plentiful and easily accessible from the site in question.</p>	<p>It is believed that this is covered appropriately by the reference to 'exceptional circumstances' in OSR2.</p>	<p>N/A</p>

<b>SC5</b> - As long as location is sensible, agree it is a must and reasonable costs, while being maintained, agree is a must.	Noted.	N/A
<b>SC5</b> - delete "and.....provision" because inappropriate as (i) such provision should be a separate planning matter for consideration independent from the new development and (ii) there are existing and planned facilities in the area	The objective as worded is seen as appropriate - it does not call for all new development to provide sport and recreation facilities, but only to do so "where appropriate".	N/A
<b>SC5</b> - A predetermined percentage of the 3 dimensional space that would be occupied by the proposed development should be given to open space and/or recreational area and be legislated	Proposals for such standards are provided in policy OSR2.	N/A
<b>SC5</b> - Landscaping of open space should consider creating biodiverse habitats that are low maintenance but attractive, delivering benefits for people and pollinators. This can also deliver a net gain for biodiversity through the use of Sustainable drainage systems including green roofs and ponds.	Noted and agreed - NHE2 requires development to achieve where possible a net gain in biodiversity and the policies recognise the benefit that SUDS can have with regards to biodiversity	N/A
<b>SC5</b> - We have open space. Your plans are to create new spaces within your new town - the years of housing development ahead which will expand private housing to those who can afford it and can move anywhere in the UK. It is pandering to government apathy and incompetence in allowing the SE of England to be overdeveloped because of the ongoing failings to encourage businesses to develop in the north of England away from London. you are creating houses for commuters. Reigate will become an area like Croydon.	Strategic issues such as the development of the north of England are matters for the national government, and cannot be addressed in this plan - the Council has a duty under national policy to provide a certain number of homes, and to plan for where those homes will be located.	N/A

<p><b>SC5</b> - Object where this is just a requirement to justify allowing development within the green belt. Within town centres it should be encouraged as appropriate to the specific development and adjoining area</p>	<p>The potential development of very small areas of the greenbelt (done if, and only if, the Council can no longer demonstrate a five year housing land supply as required by national policy) is unconnected to the policy on urban open space.</p>	<p>N/A</p>
<p>Outdoor sport for the community and if attracting events to bring people and spend to the area, no disruption of local parking or noise.</p>	<p>Noise issues are generally covered in policy DES11; the parking standards provided in an Annex to the draft DMP aims to provide enough parking for facilities of this kind.</p>	<p>N/A</p>
<p>Outdoor amenity space unduly prescriptive – there are instances where accommodation without private outdoor amenity space would be acceptable</p>	<p>It is believed that all developments could contribute towards amenity space to improve the quality of life of residents in the borough, and in situations where this is not appropriate on site, it could be provided offsite through a financial contribution.</p>	<p>"private" has been removed from the policy</p>
<p>Sport England along with Public Health England have launched the new Active Design Guidance, October 2015. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a>. Sport England believes that being active should be an intrinsic part of everyone's life pattern. As such, Sport England would expect to see the principles on Active Design embedded in any subsequent development management policies.</p>	<p>It is agreed that the referenced guidance is useful and should be promoted, although much of it seems more appropriate to policy TAP1 rather than any of the open space policies as such.</p>	<p>"such an approach can be informed by Sport England's Active Design Guidance" added to TAP1 Reasons</p>

<p>OSR3 - Sport England considers that outdoor sports and recreation facilities including ancillary facilities should be of high quality. It is important that such facilities meet the relevant design guidance to ensure that they are fit for purpose. Sport England has a range of design guidance - Sport England would suggest that the policy makes reference to the design guidance available on the Sport England website.</p>	<p>This comment has been noted. The updated Open Space, Sports &amp; Recreation Assessment recommends that new facilities should be built in accordance with Sport England and other recommended guidance.</p>	<p>Reference included in the updated Open Space, Sports and recreation assessment</p>
<p><b>Banstead</b> - Banstead community hall car park should be designated as UOS.</p>	<p>A car park does not fit the definition of open space used in the UOS assessment, and the site has consequently not been recommended for UOS designation.</p>	<p>No change</p>
<p>This should also allow for release of land that does not provide public access or is of high landscape/natural beauty.</p>	<p>All potential UOS designations have been reviewed based on three main criteria - in essence, accessibility, character, and environmental importance. Potential sites that were not found to be of high priority for protection in any of these areas have not been designated as urban open space.</p>	<p>N/A</p>
<p>Preston - The plan to the south of the new leisure centre is completely wrong (site 46). Much of the open space is being developed for housing despite the objective of urban regeneration. The remaining small copse should be designated as UOS and we suggest that there should be efforts to create a green corridor from Burgh Heath via the new housing development to the pond (site 189) through site 46 and 45 to site 35 and Linden Close. Also the Fleetwood Close open areas are an integral part of the design of the estate and at least some of these spaces should be designated as UOS.</p>	<p>Noted, and boundaries have been redrawn in the updated UOS assessment.</p>	<p>UOS Review.</p>



<p>Tadworth and Walton - We support the areas shown including the new designation 52, the Breech Lane playing fields. In the case of site 51 we wonder if it can be extended to include 'Gun Island'. It is not clear if the recreation ground at Howards Close is included. If not we suggest it be added to the list unless it is considered that the Green Belt designation is sufficient safeguard. We suggest that Shelve's Green and the open area in front of the Grumpy Mole on the Dorking Road, which was formerly common land, also be designated as UOS.</p>	<p>Noted, and an updated UOS review has been undertaken. However, greenbelt sites have not been considered, as they are not considered 'urban' and are already protected by the greenbelt designation.</p>	<p>UOS Review.</p>
<p>Land at Wellesford Close should be designated UOS - this is an important gap between Banstead and Burgh Heath. Could also be designated as green belt. The land was also considered of Grade II agricultural quality years ago when last threatened with development. The site is only served by a narrow estate road totally unsuitable for the level of traffic which would be generated by a substantial residential development. previously rejected for visual amenity reasons, this has not changed; An appeal was dismissed on this site and the Inspector supported its designation as Urban Open Space (APP/L3625/A/09/2106564. Alternatively, and probably preferably, it should be designated as Green Belt. will increase traffic on a blind bend if housing is built here, and make Chipstead Road hazardous; access by construction companies will be impossible, and have a huge impact on residents. keep as UOL - too much pollution in the area from too many properties and the A217; sewers cannot take any more waste; ancient trees would be at risk. development here would reduce</p>	<p>Noted, and an updated UOS review has been undertaken</p> <p>National policy clarifies that impact on house prices is not a material consideration</p>	<p>UOS Review.</p>

house prices in the surrounding area due to loss of tree and fields. the area could be returned to use as allotments.		
Land at Wellesford Close: UOL should be removed, this is suitable for residential development - no longer used for allotments, does not reflect character of adjoining area, relates to urban area around it, does not contribute to recreational, community, ecological or amenity value.	Noted, and an updated UOS review has been undertaken.	UOS Review.
Most school sites and some recreation sites are not designated as Urban Open Spaces. It would be good for some to keep this designation as they are in areas of local park deficiency and should a school or sports facility close there may be a case for retaining some of the site as UOS.	These sites were screened out at the first stage of the UOS review as they were felt to not meet the principle that 'local open spaces should be substantially undeveloped'. The sites that were removed were found to be primarily taken up with buildings or indoor spaces, and therefore did not contribute to openness. It would not be sensible to designate 'non-open' spaces as UOS, as this would leave the designations more open to challenge.	No change
The pieces of land suggested for a change in designation are quite obviously earmarked for future housing development because there is no other reason that the status would need to be changed.	It is important to ensure the designations for land are up to date to ensure they can be defended if challenged. If pieces of land that do not qualify as urban open space anymore are granted that status regardless, purely because they have been given it in the past, they can be challenged, potentially calling into question all open space designations in the borough.	No change
The following should be UOL: Off Hooley Lane between the Tonbridge line bridge and Kingsfield Way; On the ex-RNIB site; Along Hartspiece Road; EW03 Land off Princes Road towards Brambletye Park Road; Redstone Cemetery.	Some of these sites are already in the greenbelt, and therefore cannot be considered for UOS designation. However, the remaining sites were considered in the updated UOS review.	UOS Review.

<p>I'm not sure how building on the field behind the BCA meets this requirement. There is already an issue where residents can't use the Cricket pitch field in the summer and now you want to remove the overspill which is used heavily at this time. The park is already unusable for children over 10 and I would rather this space was re-designed to give them something they can use and meet the governments targets around spaces for older children and teenagers to benefit from.</p>	<p>The field behind the community hall is not recommended for any building - the car park around the community hall has been recommended for removal as urban open space, because it is a car park, and therefore does not meet the definition of urban open space.</p>	<p>No change</p>
<p><b>OSR1</b> - some requested urban open spaces in Horley have not been included. Can this be reviewed?</p>	<p>These sites were reviewed as part of an updated UOS assessment.</p>	<p>UOS Review.</p>
<p>Burgh Heath has already made a case in its draft SPD for a space in Canons Lane for an equipped children's playground and a community garden on the eastern side of the A217. We would like to see this space, where a horse is currently grazed adjacent to Can Hatch, designated for this purpose. In the same document it was pointed out that part of the common near to the Green was originally a cricket field and more recently an informal soccer pitch with a goal post that which was erected and removed seasonally. Mowing of this area continues as part of an annual schedule. The community would like to see this similarly designated as a place for informal games.</p>	<p>To inform the Regulation 19 Development Management Plan an updated Open Space, Sports &amp; Recreation Assessment has been undertaken which looks at children and young people provision. The report finds that for the borough as a whole there is need to provide additional children and young people provision when applying Fields in Trust Standards. For Burgh Heath alone, Fields in Trust indicate a need of 2.17ha by 2026/27. Given the constraints in the borough (i.e. the nature of the existing built up area) the report recognises that it will not be possible to provide this need. It therefore recommends that opportunities are explored to provide additional facilities in all wards, particularly those with the greatest deficits; opportunities should be provided to provide play areas within the borough's green fabric, the borough's extensive woodland and other natural areas of the borough. In terms of land adjacent to Can Hatch: in line with</p>	<p>UOS Review.</p>

	<p>other authorities and the recommendations of national guidance no sites have been identified to provide this need.</p> <p>The Green has been identified as an area of amenity greenspace and this typology includes informal sports use.</p>	
<p><b>Open space 91</b> - I ask that the wide road and wide pavement leading to St Mathews School next to Redhill Brook, be included in area 92 which will still retain its open area designation along the route of the stream.</p>	<p>This site was reassessed as part of a UOS review.</p>	<p>Updated Urban Open Space Assessment.</p>
<p>We also wish particular open spaces in Tattenhams Ward to be protected by their designation as urban open land or similar designations. A schedule of the sites which concern us is attached.</p>	<p>These sites were reviewed as part of an updated UOS assessment.</p>	<p>Updated Urban Open Space Assessment.</p>
<p>The land adjoining numbers 1 and 12 Avenue Close between the properties and road should be designated an area of Open Urban land.</p>	<p>This site was reassessed as part of a UOS review.</p>	<p>Updated Urban Open Space Assessment.</p>
<p>We would wish to discuss with RBBC reasons why the following HTC proposals were not considered: Former Phillips site on Bonehurst Road; Field on Bonehurst Road between Cambridge caravan site and Lawson's Timber Yard; Bridge Industrial Estate; Area on Smallfield Road currently earmarked for possible town park which is likely to be provided at another site</p>	<p>These sites were reviewed as part of an updated UOS assessment.</p>	<p>Updated Urban Open Space Assessment.</p>

<p><b>Banstead</b> - Banstead has an inadequate amount of greenspace.</p>	<p>Noted. To inform the Regulation 19 Development Management Plan an updated Open Space, Sports &amp; Recreation Assessment has been undertaken which looks at the quantity, quality and accessibility of the existing provision and uses national standards to assess the need for future provision. The report identified a surplus of amenity greenspace for the borough as a whole. For the north of the borough, the report identified a current surplus of 0.47ha of amenity greenspace but a need to provide 0.49ha by 2027. Given the nature of amenity greenspace and the nature of the existing built up area, the report says that in reality it will be difficult to provide this need. It therefore recommends that all existing areas are protected and that opportunities should be explored to provide additional amenity greenspace in deficient areas when they arise. For new developments, the report recommends the provision of amenity greenspace in line with Fields in Trust recommended standards (0.8ha per 1,000 people). A new nature reserve is currently being designated near Banstead. The draft DMP aims to encourage more accessible open and green space to be provided as part of new developments.</p>	<p>No change</p>
<p><b>UOL</b> - The suggestion of building on UOL sites in no way protects or enhances the village or its landscapes, completely the opposite.</p>	<p>There is no proposal to build on Urban Open Land in the DMP document.</p>	<p>No change</p>
<p><b>OSR1</b> - SEE REPS (Joan Walsh 2276) for list of possible UOS previously suggested</p>	<p>These sites were reviewed as part of an updated UOS assessment.</p>	<p>Updated Urban Open Space Assessment.</p>

<p>Most valuable' is subjective. What is most valuable to the community may not be seen as valuable to the council.</p>	<p>The Urban Open Space Review has set out three core principles to define what is 'valuable' land - in essence, these are public access, local character, and nature conservation.</p>	<p>N/A</p>
<p><b>Horley</b> - Clarification required which scenario is to be pursued as it will dictate the amount and type of open space necessary</p>	<p>This comment has been noted. The 2016 Horley Open Space, Sports &amp; Recreation Assessment recommends Scenario A rather than Scenario B as scenario B differs from the approach taken elsewhere in the borough.</p>	<p>No change</p>
<p><b>OSR1</b> - The list of allocated sites for open space is not yet included in any of the policies within the DMP (or in the supporting text). Whilst acknowledging that these are only the preferred option sites at this stage, the DMP does not currently include the required certainty as to the sites which are proposed to have their respective open space allocations 'rolled forward' from BLP Policy Hr33. Too much reliance is placed on each reader's interpretation of the supporting Policies Map. In order to satisfactorily address this we request that the list of sites allocated for open space provision (including the Town Park) is included in the future Regulation 19 version DMP. We also request that Policy Approach ORS1 identifies the type of open space which is to be provided in each case, with further details given (if necessary) in an appendix to the DMP.</p>	<p>A list of proposed UOS sites will be provided at Regulation 19 stage as well. It would be very unwieldy to include this information within OSR1. The point about 'types' or UOS is not felt to be relevant - land is not designated as a type of UOS, it is only designated as UOS or not, and all types of UOS have equivalent protection.</p>	<p>No change</p>
<p><b>OSR1</b> - This is a very important factor, the words used with reference to exceptions do not fully reflect the use and value of OSRs. Any replacement should acknowledge these needs and be located so that it becomes an integrated part of a neighbourhood. Remote replacement would not necessarily meet these</p>	<p>Noted and agreed. OSR1 will be updated to make clearer that a nearby replacement is considerably preferred to a remote one. Allotments have been given stronger protection in an addition under the Landscape, Biodiversity, and Green Infrastructure section.</p>	<p>Policy OSR1 now notes that "Replacement open spaces should be as close to the lost</p>

<p>needs. Urban Open Space is perhaps the most vulnerable land in the borough because of the inviolate nature of Green Belt. A number of proposals contained here involve the development of Urban Open Space owned by Surrey County Council. It would be relatively easy for other owners of Urban Open Space to formulate arguments for its release for their own use. Great care must therefore be taken to formulate criteria that are fair and defensible. many of the spaces are remnants of land from incremental building development. The spaces have not been planned, although they provide a visual break they have no real function or community purpose. To some extent this is an unsatisfactory legacy which has to be accepted. Opportunities should however be sought to permit other uses compatible with retaining the open space. Allotments should be protected. Their occupancy fluctuates and one should guard against the conclusion that they are under used unless this evidence extends over a long period, once lost they would be hard to replace.</p>		<p>open space as possible", and NHE4(1) looks favourable on "proposals that enhance, extend, or make new provision for allotments or community food growing opportunities "</p>
<p><b>OSR1:</b> The wording appears too permissive to development on UOS. It seems that as long as openness is preserved (a very subjective criterion), parts of designated UOS could be built on. Amend the wording of para 1 so that there is an explicit presumption against development of any part of a UOS.</p>	<p>Such a presumption would be likely to be found unsound by an inspector, as it would be seen to contradict the presumption in favour of sustainable development in national policy. While the plan can discourage development of open spaces, to explicitly rule out all development of them under any circumstances would be problematic.</p>	<p>No change</p>

<p><b>OSR1</b> - Proposed policy OSR1 (p69) Item 2a)iii) should be extended to state that this should not be allowed where the resulting sports and recreation provision is less than the national guidance on minimum playing field standards, and that urban open land with ecological diversity and tree cover should be replaced like for like, in line with the requirement to preserve or improve biodiversity associated with planning changes (such as reflected in NHE2).</p>	<p>Noted, but the previous clause already states that replacement open space should be of equivalent or higher quantity and quality.</p>	<p>No change</p>
<p><b>OSR1</b> recognises that education provision might present special circumstances. This is welcomed as it reflects paragraph 72 of the National Planning Policy Framework. We do however consider it unnecessary to designate and stringently protect school playing fields as Urban Open Space as they are already protected from inappropriate development by the National Planning Policy Framework (paragraph 74). Unnecessary additional barriers to school development schemes can cost the county council additional time and money as a school provider and potentially impact on the provision of improved facilities to local communities. expansion can sometimes only be feasibly accommodated by extending a school onto part of the school playing fields. We are pleased to see that Policy OSR1 makes some allowance for this situation, although we hope that not all school playing fields will be designated Urban Open Space,</p>	<p>Reassurance can be given that not all school playing fields have been designated as urban open space. Playing fields have had to go through the same screening process as all other potential UOS sites, and must be considered to be suitably open, accessible, characterful, or environmentally important to qualify for UOS designation. It is appropriate to designate the most important open spaces in the borough, including school playing fields where necessary, in order to provide an adequate level of certainty within the plan and to ensure that policy OSR1 can require alternative open spaces to be provided in the event that UOS land has to be lost. It is also appropriate to ensure that the process of designating UOS is applied consistently across the borough, rather than excluding a particular type of space.</p>	<p>No change</p>
<p>Are there going to be children's playgrounds in the town centre and the new housing developments?</p>	<p>Policy OSR2 states that on developments of 40 or more housing units, there must be a minimum of 0.25 hectares of equipped play space per 1,000 people.</p>	<p>N/A</p>



<p>Horley's open spaces are rapidly being eroded, notably the extensive development at Simons farm (1500 houses) the mushrooming expansion of the Acres and the "jamming in" of houses on numbers of smaller areas of open space.</p>	<p>The plan aims to protect existing open spaces as far as possible while still meeting the borough's housing need over the coming years. In some cases, this will mean the loss of open land, but the plan aims to achieve this in as sensitive a way as possible.</p>	<p>N/A</p>
<p>There will not be enough open spaces as developers always build as many houses as the can in a given space. Provision of open space is supported, but not if it means packing in large numbers of small houses close together.</p>	<p>The policies in the draft DMP document intend to counteract this by providing requirements for open space in new developments.</p>	<p>N/A</p>
<p>Investment into Lady Neville Park has been unsatisfactory. In comparison to the wonderful park in Reigate, it seems that Banstead has been let down.</p>	<p>The DMP deals with future planning considerations for the borough, rather than redressing perceived funding deficiencies in the past.</p>	<p>N/A</p>
<p>We have ample sports centres and Priory Park for sporting activities - no need for anymore.</p> <p>All very well but we already have good sports provisions in the borough, not a strong enough bargaining chip to make people want to increase the population in the borough.</p>	<p>This comment has been noted. To inform the Regulation 19 Development Management Plan, the Open Space, Sports &amp; Recreation Assessment has been updated. This report looks at the current provision of outdoor sports in terms of quantity against national standards. The report identifies the need for 27ha of outdoor sports for the borough as a whole - it however recognises that due to nature of the existing built up area that it will not be possible to provide this level of outdoor sports and therefore recommends that opportunities are explored to provide outdoor sports within existing areas such as recreation grounds, within the wider countryside and within the urban fringe. It also recommends that opportunities should be explored to allow public access to facilities which currently have no public access and that for new developments provision should be provided in line with Fields in Trust Recommended Standards. The DMP applies to all areas of the borough, not just the</p>	<p>N/A</p>

	Reigate/Redhill area. The references to sports provision in the DMP are designed to protect an element that is considered an intrinsic good in national and local policy, not to bargain over population increases.	
More open space is needed, but not just golf clubs. There must be new parks and public green areas.	Noted and agreed - the policies in the draft DMP document aim to deliver this.	N/A
<b>SC4</b> - The most valuable open space to me is the green fields surrounding Horley which flood each year and help prevent local houses and businesses flooding	This is noted, and flooding issues are covered more appropriately elsewhere in this document.	N/A
<b>SC4</b> - Do not change planning consultation documents in favour of the local council's wishes to build on green space that has previously been protected. Leave our green space alone!	There is no attempt to do this in the current plan. SC4 identifies which areas of the borough are suitable to be designated as urban open space (see the evidence base on the Council website) The Development Management Plan is a document which the Council need to develop in order to deliver the strategy identified in the adopted Core Strategy	N/A
<b>SC4</b> - Again, I am not sure that the plans do protect vulnerable open urban spaces. With more buildings being planned on the open air car park, how do you think that it will happen. Moreover, building on the green belt will certainly impact the aesthetic and the quality of living in Redhill.	A car park is not considered an urban open space, as it provides no benefits with regards to the three principles looked for - accessibility, character, or environmental considerations. The issue of building on the green belt is addressed in the greenbelt section of this document.	N/A

<p><b>SC4</b> - Your plans are not about protecting valuable open spaces. Your plans clearly will require a dual carriageway and further road building to divert the increase of traffic in the south of the town. If you refer to Priory Park that is a red herring statement - the park is protected. within 20 years Reigate will require a flyover structure in the south at the back of Priory Park</p>	<p>The current assessment of urban open space in the borough (which can be found online) identifies a number of spaces of different kinds, protecting the majority of urban open spaces, and providing for a range of different users. Road building is the responsibility of Highways England and the County Council, and as far as Reigate &amp; Banstead Borough Council is concerned, any proposed new development to the south of Reigate will need to demonstrate that it will not have an unduly negative impact on traffic in the area before it can be given permission.</p>	<p>N/A</p>
<p><b>SC4</b> - This include all Green belt areas whether classed as poor quality or good quality</p>	<p>This policy refers to open space within urban areas and developments, not green belt land. Green Belt is covered under Policy NHE5</p>	<p>N/A</p>
<p><b>SC4</b> - Protect all open spaces. Particularly the green areas on the edges of town. Redevelop brownfield and commercial sites instead of building on countryside or farmland.</p>	<p>The DMP focuses on the redevelopment of previously developed land first, releasing countryside (greenbelt) land only if and when the council cannot demonstrate a five year housing land supply as required under national policy.</p>	<p>N/A</p>
<p><b>SC4</b> - We'll be publishing research next year into the quantifiable benefits of public space and the process of developing and maintaining successful public spaces, which might help your business case.</p>	<p>Noted - the Council looks forward to seeing this work.</p>	<p>N/A</p>
<p><b>SC4</b> - All open space within urban areas should be protected. Not just the most valuable. Children need space to play and run around. This needs open space. Dog walkers need space too, and it ought to be separate from the children.</p>	<p>The current assessment of urban open space in the borough identifies a number of spaces of different kinds, protecting the majority of urban open spaces, and providing for a range of different users. The plan aims to identify the areas of open space that actually contribute to the feeling of 'openness' or other elements of local character, or provide benefits in terms of access or environmental considerations. By</p>	<p>N/A</p>

	carefully defining these areas, they can be better protected; by simply designating all open spaces as equally valuable, the Council would leave itself open to challenge by developers.	
<b>SC4</b> - The use of the phrase "open space" could apply to any area or landscape that is open irrespective of whether the space is public or functions in what most people would understand to be open space. More information, and a clear definition of what constitutes "open space" is needed.	This is provided in the Urban Open Space Assessment that constituted part of the evidence base for the consultation. It identified three principles of urban open space - in essence, these were accessibility, character, and environmental considerations. -	N/A
<b>SC4</b> - Preserve the sense of community by offering such projects as the parks in Redhill and Reigate.	The Council aims to serve every area of the borough in terms of park provision, though it can of course not be promised that every area will receive a park of equal size or style.	N/A
Communal outdoor gym equipment would be nice.	Noted. To inform the Regulation 19 Development Management Plan an updated Open Space, Sports & Recreation Assessment has been undertaken which looks at the quantity, quality and accessibility of existing provision in the borough. The report hasn't looked at the need for outdoor gym equipment as this is not a recognised typology - the report has been undertaken in line with other authorities and recommended national guidance. The report does however recognise that when opportunities arise, opportunities should be explored to improve the quality of existing parks and gardens and amenity greenspace. These kind of facilities would be supported as part of new amenity space in the borough.	N/A

<p>Open spaces in urban areas are very important. But open spaces everywhere are. Open spaces in urban areas are somewhat less important than open spaces elsewhere as if you prioritise building on the latter we will all end up with suburban/urban homogeneity everywhere which is bad for all.</p>	<p>The draft DMP proposes possibly building on a very small amount of greenbelt land if, and only if, certain conditions are met with regard to the Council's need to demonstrate a five year housing supply. This will leave the majority of the borough as rural land still, avoiding 'suburban homogeneity'.</p>	<p>N/A</p>
<p>If existing open spaces are maintained, the need to incorporate manufactured ones as part of new developments is reduced. Spaces that have existed for hundreds of years should always take priority.</p>	<p>Existing open spaces in the borough are currently being maintained. The draft DMP document sets out which open spaces in the borough best meet certain criteria related to access, character, and environmental considerations, and are thus worthy of being designated as 'urban open space' to provide stronger protection.</p>	<p>N/A</p>
<p>If new developments are on Green Belt/countryside, small 'open space', and 'outdoor sports and recreation provision' will not compensate for loss of countryside</p>	<p>The draft DMP proposes possibly building on a very small amount of greenbelt land if, and only if, certain conditions are met with regard to the Council's need to demonstrate a five year housing supply. The provision of open space in urban areas is not intended to be 'compensation' for this process.</p>	<p>N/A</p>
<p>All new developments should be designed with the balance between built and natural environment with the appropriate on-site open space provision to meet the recreational needs of future residents.</p>	<p>The policies as currently written aim to do this.</p>	<p>N/A</p>
<p>§ Greenacre School, Sutton Lane. This should be designated as UOS.</p>	<p>Been reconsidered in an updated UOS review.</p>	<p>Updated Urban Open Space Assessment.</p>
<p><b>OSR1: 1)</b> As before planning permission WILL be granted. Wording should be changed.</p>	<p>The policy has been updated and no longer uses the wording "planning permission will be granted", policy now states that application would be looked on</p>	

	favourably	
<b>SC5</b> - new development should also have built in waste collection facilities that support the Borough's kerbside waste collection system. (See Planning Policy Guidance paragraph 28-018-20141016).	The ability for safe and accessible waste collection will be expected in detailed designs that come forward on application for planning permission.	N/A
<p><b>Town park allocation</b> - landowners submitted reps in which they consistently objected to the way in which the matter of the Town Park's allocation and its delivery have been, and is proposed to be, addressed. Contended that the existing BLP allocation is unsound as it is not underpinned by a robust and credible evidence base relating to need, site selection, funding and deliverability. The Town Park is perceived to be part of the strategic green infrastructure required to meet the needs of Horley's residents in the Plan period. The matter should have been given appropriate consideration in the CS, rather than delayed until DMP. It is apparent from relevant docs that the Town Park allocation is the principal reason why SEH7 has historically been deemed unavailable. Only other significant constraint is flood risk on part of the site; yet this applies equally to other competing sites on the edge of Horley which have been shortlisted for housing in the DMP.</p> <p>disappointed that only relatively limited background work to consider alternatives to the Town Park on Site SEH7 appears to have been undertaken in 2 years since the CS adoption. The Horley Open Space Assessment - there is no evidence provided that the sites recommended in Section 4 of the Assessment</p>	<p>This comment has been noted. It is not intended that the existing Town Park Allocation will be carried forward in the Development Management Plan. Instead, it is recommended that the provision is delivered on a number of sites. The sites recommended in the 2016 Horley Open Space Report have all been sustainability appraised apart from Horley Recreation Ground - this is an existing recreation ground, it is in a central location and the report only recommends improvements to the quality of provision. As outlined in the Urban Extensions Technical Report, SEH7 was not allocated for housing development because of flood risk. The site is not sequentially preferable and coherent development could not be achieved on Flood Zone 1.</p> <p>In terms of the Riverside Greenchain Allocation the comments have been noted. The Riverside Greenchain was allocated in the 2005 Local Plan. The land was designated to allow informal recreation; formal recreation, allotments, agriculture and woodland; the establishment of local nature reserves; enhancements to the riverine environment; safe access to the riverine environment whilst protecting other areas; interpretation of archaeological sites; creation of ponds, swales and stormwater wetlands;</p>	

<p>have been the subject of a sustainability appraisal, nor is it clear what, if any, alternative sites have been considered for the Town Park.</p> <p>Firstly, agree with the methodology which has been used in the Assessment, insofar as it accords with the provisions of NPPF Para 73. Secondly, endorse the Assessment's principal conclusion that an identified need for formal open space provision in Horley should be addressed first by 'repurposing' existing areas of natural and semi-natural green space and amenity green space (where there is an existing surplus) before looking to identify sites not already operating (or for which planning permission is not already in place) as open space</p> <p>Whilst not addressed in the Assessment or DMP, 'Horley Factsheet' identifies that it is proposed that all of Site SEH7 continue to have a 'Riverside Green Chain' designation. We contend never been any sound planning reason to designate any part of the Site SEH7 as Riverside Green Chain, and certainly not all of it. We object to this designation, and it should be deleted.</p>	<p>construction of a combined orbital cycle and pedestrian path with connections to new and existing housing; and the provision of facilities for horse riders where practical. At the time there were discussions with the Environment Agency which highlighted the potential for access and environmental improvements to the river system in Horley, the proposed designation was sought to provide this.</p>	
<p>However open land is rare and people's lives are enhanced by space-squeezing developments into open land that could be used for the existing community is not supported.</p>	<p>There is no suggestion of squeezing developments onto urban open space - urban open space is strongly protected by policy OSR1.</p>	<p>No change</p>
<p>green belt land, cycle paths, bridle paths etc. must be protected</p>	<p>Noted. This is what the policies seek to achieved</p>	<p>No change</p>

We note that the provision of the Town Park is not mentioned anywhere in the document.	This comment has been noted. The 2016 Horley Open Space assessment looks at the need for parkland within Horley and makes a number of recommendations for delivering parkland. It is not intended that the existing Town Park Allocation will be carried forward in the Development Management Plan.	No change
More safe outdoor spaces	Noted. This is what the policies seek to achieved	No change



**Recreational Facilities:**

As parents of a six year old, we have the need for public playing grounds. There is one at Woodhatch, (by The Angel public house), but this is not a safe place to visit. I don't visit there any more. But this is in a more built-up area and it could be argued that compressed "affordable" housing leads to a reduced feeling of pride in the environment and that's why that playground is the way it is. It would be a shame to see others go that way. Aside from that, Reigate Park is fantastic but it is already running at full capacity in the summer and I don't think the recreational areas are sufficient to accommodate an increase in local population.

This comment has been noted. An updated Open Space, Sports & Recreation Assessment has been undertaken to inform the Regulation 19 Development Management Plan. To inform this report planning policy officers visited all areas of open space, sports and recreation, including Woodhatch Park and undertook quality assessments. These quality assessments were based on national recommended criteria. The play area on the day of the site assessment was found to be in good quality - there was no litter observed (the site assessment is detailed in the appendix of the report). However, it is recognised that this is only one days assessment and that the quality may vary. The report recognises that there is differences in terms of the quality of the play areas in the borough (i.e. parking, litter, vandalism etc.) and recommends that the quality of the areas should be improved as and when opportunities arise. For play provision in total, the report identified a need against national standards for 33.1ha of children's play to meet the expected population in 2026/27 but recognised that due to the existing nature of the built up area that it will not be possible to provide this level of play. It therefore recommends that opportunities should be explored to provide facilities within the green fabric, woodland and other natural areas of the borough and that new developments should provide play areas in line with national standards. This approach is in line with other authorities.

No change

<p>Better parks and play areas for kids. Better local sports area to get kids out and active and keep out of trouble. Love Priory Park, but always too busy and nightmare to get parked.....more like this in our areas please!! More soft play and indoor play areas in Tadworth please.</p>	<p>This comment has been noted. An updated Open Space, Sports &amp; Recreation Assessment has been undertaken to inform the Regulation 19 Development Management Plan. The report looks at the need for open space, sport and recreation provision and the quality and accessibility of current provision. The report identified deficits against national standards in terms of both park and play provision but recognised that it will not be possible to deliver the provision recommended by national standards (Fields in Trust) due to the nature of the existing built up area. The report therefore recommends for parks and gardens that the current facilities should be retained and that the quality of offer should be improved. In terms of children's play areas, the report recommends that opportunities should be explored to improve provide facilities in the urban fringe, woodland and other natural areas of the borough. In terms of soft play, unfortunately this isn't a typology that is recommended to be assessed in the national guidance. The updated Open Space, Sports &amp; Recreation Assessment does look at the need for indoor sports and finds that there is currently no need for additional facilities.</p>	<p>No change</p>
<p>More bridleways across the whole of Surrey. Provide Equestrian bridle paths in Nork Park and from the drift bridge field etc. to the Epsom Downs We need an Equestrian centre in the Nork area Open up more areas for Equestrians. Provide a new Equestrian facility close to Epsom downs</p>	<p>This is covered by policy NHE8</p>	<p>No change</p>

<p>OSR1 - the policy does not set out the criteria against which proposals will be assessed or the threshold which will need to be satisfied.</p> <p>RGS consider that the policy should include specific clear criteria against which applications for sports and recreation uses or the expansion of education facilities will be assessed. This will provide clarity on the potential of sites to accommodate additional facilities and remove uncertainty and subjectivity. In the absence of a clear criteria based approach there is the potential for lack of consistency in decision making.</p> <p>RGS recommend that in part iii of the policy the wording should be amended from “existing school” to “existing school sites”.</p>	<p>The criteria for UOS is included in the UOS review. It is unclear what is being asked for here, as the policy provides a set of criteria against which proposals for development on existing UOS will be assessed in clause 2. There is no need for the change of wording mentioned in the final section of the comment, as the policy does not refer to the expansion of school sites, but rather school buildings.</p>	<p>No change</p>
<p>more soft play areas to take little ones in the colder months.</p>	<p>This comment has been noted.</p> <p>To inform the Regulation 19 Development Management Plan Consultation an updated Open Space, Sports &amp; Recreation Assessment has been undertaken which looks at the quality, quantity and accessibility of existing facilities in the borough. This report has been done in line with national guidance and other authorities approaches and unfortunately does not assess the need for soft play areas as it is not a recognised typology of open space, sport and recreation provision. The report does however look at the need for indoor sports and found that there is no need for additional facilities.</p>	<p>No change</p>

AIRPORT PARKING		
TAP2 - Supported. Gatwick has good transport links, although these could be improved and the Council should seek to do this. Modal shift should be encouraged.	Bus and rail transport links to Gatwick are not the responsibility of the Council. However, a modal shift towards sustainable modes of transport, including walking, cycling, and public transport, is promoted in Policy TAP1, and any new development near Gatwick would be expected to comply with this policy (the airport itself is, of course, not in Reigate & Banstead Borough).	No change
Consideration should be given to designating existing car parking sites, other than those in close proximity to the airport, for other uses including housing.	A number of sites throughout the borough that are currently used for car parking have been suggested for redevelopment that will include housing. These sites include BAN3, RTC1, RTC6, REI2, and HOR1.	No change
There is a lack of empirical evidence to support the premise that restricting additional airport parking to the boundaries of the airport will encourage the use of alternative modes of transport to the airport.	The examination of Crawley Borough Council's Local Plan determined that there is 'no cogent evidence to the contrary' to the suggestion that on-airport parking is the most sustainable option for airport parking. This is in line with Gatwick Airport Limited's Surface Access Strategy Document.	No change
Different passengers rely on different modes of transport specific to their need, and access to these different modes of transport should not be restricted.	Access to different modes of transport is not being restricted. Off-airport car parks already exist in the surrounding area, and Gatwick Airport has a strategy to provide for the remaining parking need entirely within the airport boundaries, in line with its public transport modal targets and its Surface Access Strategy.	No change

<p>By restricting the provision of airport car parking to within the boundaries of Gatwick Airport, Reigate and Banstead is promoting an anticompetitive policy and establishing the dominant position of the airport in terms of car parking. Policy TAP 2 therefore fails the economic role of sustainable development and is not in general accordance with the requirements of the NPPF.</p>	<p>The presumption in favour of sustainable development does not require that all kinds of development be allowed in all areas of a borough. With the numerous constraints on land in RBBC (particularly the presence of greenbelt land, and the need for housing and employment land), there is a strong argument to be made that the best use of land in the borough is for housing and employment uses rather than large car parks that can be provided within the airport boundary. This is not an anti-competitive policy, as businesses other than Gatwick Airport Limited are still able to own and operate parking services both within the airport boundary and on existing off-airport parking sites. The policy therefore balances the economic, social, and environmental aspects of sustainable development, which is in line with the policies of the NPPF.</p>	<p>No change</p>
<p>This policy would direct all passenger car traffic into the local road network around the airport giving rise to impacts on air quality.</p>	<p>The policy concentrates traffic within the Gatwick Airport area, where the roads are designed to handle the higher level of traffic and air quality can be more carefully monitored and managed. Dispersing this traffic across a wider area would put additional stress on local roads and air quality.</p>	<p>No change</p>
<p>The proposed policy would give RBBC no recourse if Gatwick were to underestimate parking need, with the result of illegal and unauthorised rogue trader car parks opening up in the borough.</p>	<p>The Council has confidence in Gatwick Airport's Surface Access Strategy and its ability to provide sufficient parking to meet its needs while continuing to encourage modal shift towards public transport. Gatwick's plans were determined to be viable in the examination of Crawley Borough Council's Local Plan.</p>	<p>No change</p>
<p>The sustainability appraisal contains two very similar policies - Airport Parking and Gatwick Airport Car Parking - it is unclear why these are separate or what the difference is or how they have individually contributed to the single</p>	<p>An updated sustainability appraisal has been undertaken, more clearly and consistently explaining the options assessed.</p>	<p>No change</p>

policy TAP2.		
Airport Parking SA - no reasoning is given for stating that option 2 would protect the role of Gatwick Airport and its functions. No consideration has been given in option 1 to the various kinds of airport parking product available and whether any of them could provide more sustainable options around carbon emissions and air quality. No consideration has been given to applying a levy to new off-airport parking in order to encourage public transport. No consideration has been given to restricting certain types of airport related facility within a defined radius of the airport.	An updated sustainability appraisal has been undertaken, more clearly and consistently explaining the options assessed.	No change
Gatwick Airport Car Parking SA - option 1 is capable of making best use of previously developed land, while resulting in the creation of a high level of blue collar jobs and assisting local people in finding employment. Should be scored higher on previously developed land and employment criteria.	An updated sustainability appraisal has been undertaken, more clearly and consistently explaining the options assessed.	No change
The two SAs have the same option 1, but score them differently on objectives 4 and 5 - one of the SAs scores option 1 positively for these objectives; the other scores option 1 negatively for the same objectives. This is confusing.	An updated sustainability appraisal has been undertaken, more clearly and consistently explaining the options assessed.	No change

<p>request that policy TAP2 is replaced with a policy that allows for the delivery of off-airport car parking where demand for car parking spaces, recognising the multi-faceted nature of airport access, is not provided on airport in line with demand. In these circumstances off-airport car parking would be permissible in sustainable locations and where a sustainable parking operation, such as park and ride, is delivered.</p>	<p>The Council currently believes that the general policy approach represented by Policy TAP2 is sound, and contributes towards the objectives of the plan. An updated sustainability appraisal has been undertaken, more clearly and consistently explaining the options assessed.</p>	<p>No change</p>
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Access and Traffic		
<p>We don't need more traffic in Banstead when there are two schools in the area - this is a risk to the children. Any new development on Bolters Lane will also increase traffic access to that road, which will then congest the centre of Banstead as other drivers divert from Bolters Lane.</p>	<p>Our Core Strategy (adopted 2014) is the first part of our Local Plan. This sets out that the Council has a duty to plan for the provision of 460 homes per year and to protect/provide adequate business and retail floorspace in line with need for specific areas of the borough, informed by research - see the following link for the evidence which supports the DMP <a href="http://www.reigate-banstead.gov.uk/info/20270/development_management_plan/761/dmp_-_evidence">http://www.reigate-banstead.gov.uk/info/20270/development_management_plan/761/dmp_-_evidence</a>. The Core Strategy sets out that our approach to development is an 'urban area first' approach to try and remove the need to develop in</p>	<p>No change</p>

	<p>the Green Belt.</p> <p>The DMP proposes sites that are considered to be appropriate for specific types of development and approximate amounts. The cumulative impact of all the proposed sites on the road network has been modelled by Surrey County Council and shows that should all of the developments come forward then the road network could accommodate this, although some mitigation may be required in some areas. Where mitigation is required due to a proposed development then the developer would be expected to fund the improvement. Surrey County Council, as the Highway Authority, are continuously working on improvements to the highway network as well to tackle current issues.</p> <p>In addition, any development on these sites will still be subject to a planning application, which will need to demonstrate that for transport (in line with national planning policy) the residual cumulative impacts are not severe and will not impact on the safety of pedestrians. In addition, although we can only put sites into the DMP which are available for development, this does not mean that they will all come forward for development as the Council does not control the vast majority of sites, and landowners may choose not to bring a site forward for development.</p>	
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<p>Traffic is already quite an issue and proposed changes would have a serious impact on road traffic in and around the area of Banstead - a thorough traffic analysis and report must be published taking in surrounding areas such as Winkworth Road ,Bolters Lane and access to the A217 Banstead crossroads.</p>	<p>The cumulative impact of all the proposed DMO sites on the road network has been modelled by Surrey County Council which shows that should all of the developments come forward then the road network could accomodate this, although some mitigation may be required in some areas. Where mitigation is required due to a proposed development then the developer would be expected to fund the improvement. Surrey County Council, as the Highway Authority, are continously working on improvements to the highway network as well to tackle current issues.</p> <p>In addition, any development on these sites will still be subject to a planning application, which will need to demonstrate that for transport (in line with national planning policy) the residual cumulative impacts are not severe and will not impact on the safety of pedestrians. In addition, although we can only put sites into the DMP which are available for development, this does not mean that they will all come forward for development as the Council does not control the vast majority of sites, and landowners may choose not to bring a site forward for development.</p>	<p>No change</p>
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<p>Traffic calming measures are already needed, but their effectiveness will only get worse if hundreds more vehicles are accessing Banstead.</p>	<p>Surrey County Council are responsible for existing highways including traffic calming measures road crossings. See the link below for further information on these, including:</p> <p>- information on request for central crossing - <a href="https://www.surreycc.gov.uk/roads-and-transport/working-to-keep-surrey-moving-how-we-deal-with-highway-requests">https://www.surreycc.gov.uk/roads-and-transport/working-to-keep-surrey-moving-how-we-deal-with-highway-requests</a></p> <p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed which is included in the site allocations.</p>	
<p>Proposed access to the site at Wellesford Close is via a small narrow cul de sac, which is already an off shoot additionally added on some years ago when the second half of the close was constructed. The idea that this is 'safe and well designed' is laughable, it would only take a car parked outside one of the houses and emergency service vehicles/refuse lorries would be severely constricted.</p>	<p>Objective SC7 is an objective which would delivered by policy TAP1. This policy requires the following:</p> <p>that any proposed development must ensure access by service vehicles (including refuse vehicles) and emergency vehicles at all times without restriction, including adequate width to ensure there is no obstruction from parked vehicles. On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where possible.</p>	

<p>The A23, A217 and B2036 (Balcombe Road) to name but three are not of a standard to cope with current traffic let alone that generated by another 2400 homes and a business site.</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions, rather than new major roads (although new access roads will be built to serve large-scale new developments).</p> <p>Infrastructure to support approved developments being built will be funded and / or provided by the developer through planning obligations or financial contributions to the Community Infrastructure Levy. Developers are required to provide or make contributions to the infrastructure needed to support the development planned.</p>	
<p>There are major 'pinch points' in Horley, for example at Vicarage Lane, Lee Street, the Chequers roundabout, the road layout between Horley Station and the centre of town, and trying to negotiate around parked cars at the Northern end of Victoria Road. No proper consideration has been taken of how addition road traffic will impact on existing roads, yet the Council is keen to add to problem.</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions, rather than new major roads (although new access roads will be built to serve large-scale new developments).</p> <p>Infrastructure to support approved developments being built will be funded and / or provided by the developer through planning obligations or financial contributions to the Community Infrastructure Levy. Developers are required to provide or make contributions to the</p>	

	<p>infrastructure needed to support the development planned.</p>	
<p>Smallfield will have more residential properties which will cause further pressure on the B2036/Smallfield Road junction.</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions, rather than new major roads (although new access roads will be built to serve large-scale new developments).</p> <p>Infrastructure to support approved developments being built will be funded and / or provided by the developer through planning obligations or financial contributions to the Community Infrastructure Levy. Developers are required to provide or make contributions to the infrastructure needed to support the development planned.</p>	

<ol style="list-style-type: none"> <li>1. Improved access on Three Arch Road (all arches opened)</li> <li>2. Improved flow assessment on our key roads</li> <li>3. Consideration for an A217 to A23 link north of Horley</li> <li>4. consideration for a new dual carriageway / 3 lane link road between M23 J9 and the A22 / M25 J6 to not only allow an alternative for the Kent bound traffic but also to provide a diversion route for the M23 that avoids out town centres</li> </ol>	<p>A transport assessment has been undertaken for all proposed development across the borough. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). However, upgrading of existing roads is actually delivered by Surrey County Council. More information can be found in the Infrastructure Delivery Plan</p>	
<p>Expansion of the bus route 405 to East Surrey Hospital and route 420 from Whitebushes to Crawley to encourage bus usage and get less cars on the road.</p>	<p>The bus network is mainly controlled by Surrey County Council. Their local bus strategy is available here: <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf</a></p>	

<p>It is not only the new developments but key public service centres such as East Surrey Hospital has good access (hopefully the other arches opened) as well as additional parking as the last thing local residents want is for the local area to become an overflow hospital car park.</p>	<p>The planning process does not enable us to interfere with existing developments. Where there are existing problems i.e. with parking, this is the remit of other council departments i.e. the borough council enforcement team if a condition attached to a planning permission is not being adhered to or the county council who will deal with parking restrictions.</p> <p>However, in preparing the DMP we have undertaken discussions with services providers such as health care providers, which included discussions with East Surrey Hospital. The purpose of these meetings have been to ensure that additional projected population will not negatively impact on existing services. Where there will be an impact on services the DMP sets out what mitigation would be expected and how this should be funded by the developer.</p>	<p>No change</p>
<p>More and more drivers are using Staple Hurst Road as a cut through from the A217 to the A23 via Woodhatch and/or Pendleton Road. On this point you have refused to lower the speed limit to 20mph to make it safer for everyone living here.</p> <p>Speeding and cutting through side roads close to A217 and Diceland road needs to be addressed since the new M&amp;S/BP has opened.</p>	<p>Surrey County Council are responsible for existing highways including setting speed limits. See the link below for further information on these, including:</p> <p>-information on request for changes to speed limits:  <a href="https://www.surreycc.gov.uk/roads-and-transport/road-safety/speed-limits">https://www.surreycc.gov.uk/roads-and-transport/road-safety/speed-limits</a></p>	<p>No change</p>
<p>Policies M5 - M7 of the 2005 Local Plan need to be reconsidered and incorporated in the new Local Plan.</p>	<p>M5 - M7 have been incorporated into the policy. They have not been transferred verbatim as there are parts of the policies which could be seen as overly restrictive and some parts have been superseded by introduction of CIL.</p>	<p>Reference to loading/unloading in TAP1</p>

<p>The proposal to provide access for vehicles onto the M23 spur is unacceptable.</p>	<p>Comment is noted. Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. Any planning application would have to justify that an appropriate scheme could be achieved</p>	
<p>New roads must be wide enough to accommodate emergency vehicles and on-street parking, limiting the possible size of houses and gardens.</p>	<p>Policy TAP1 requires the following:</p> <p>that any proposed development must ensure access by service vehicles (including refuse vehicles) and emergency vehicles at all times without restriction, including adequate width to ensure there is no obstruction from parked vehicles. On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where possible.</p>	
<p>Essential, too many new housing estates are built with too little parking and make access around the estate roads very difficult with often cars parked on kerbs.</p>	<p>Policy TAP1 requires the following:</p> <p>that any proposed development must ensure access by service vehicles (including refuse vehicles) and emergency vehicles at all times without restriction, including adequate width to ensure there is no obstruction from parked vehicles. On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where possible.</p> <p>Parking standards have been revised and are a minimum rather than maximums as they were previously</p>	<p>Following text added to Policy TAP1: On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where</p>

		possible.
Our roads are chock-a-block, properties often have more than one car, these shouldn't be on major roads slowing up traffic or impeding emergency services or close to schools	It is recognised that parking and access is a particular issue and the Council are looking to tackle this issue from a number of different angles. The DMP is seeking to ensure that new roads are wide enough to enable easy access for emergency services and refuse trucks, that adequate parking is provided and that sustainable transport measures, such as cycle routes, are incorporate to a high standard. Other departments in the Council are also looking at how to improve the existing parking situation in the borough and more efficient enforcement for bad parking.	No change
equal access not preference for cars. Also consider eg bike hire, car pools etc. and enhance public transport	The National Planning Policy Framework, which sets out the Government's policies for the planning system, states that "the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel" and "plans should "protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to ... give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; [and] create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones". "Planning Practice Guidance, which is another forum for Government guidance on the planning system, states "maximum parking standards can lead to poor quality development and congested streets, local planning authorities should seek to ensure	No change



	<p>parking provision is appropriate to the needs of the development and not reduced below a level that could be considered reasonable".</p> <p>As such, our policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as sustainable transport choices for those who rely on or choose to use these transport modes.</p> <p>The DMP requires all development across the borough to "incorporate a highway design and layout that achieves a permeable highway layout, connecting with the existing highway network safely and includes safe access for pedestrians and cyclists" and to "incorporate pedestrian and cycle routes within and through the site, linking to the wider sustainable transport network, especially in and to the borough's town centres".</p>	
<p>Where the development encroach on countryside, consider safety and access for horse riders</p>	<p>Proposed policy <b>TAP1</b> in the DMP requires that all types of development across the borough provide safe and convenient access for all road users in a way which would "not compromise the free flow of traffic on the public highway, pedestrians or any <u>other transport mode</u>, including public transport and cycling .... [or] increase the risk of accidents or endanger the safety of road users including pedestrians, cyclists, and other <u>vulnerable road users</u>"</p>	<p>No change</p>

<p><b>TAP1 and Annex 4 – Parking</b>  TfL supports a restraint based approach to car parking within London boroughs as set out in the London Plan. Parking policies within Reigate and Banstead should take account of the potential for cross boundary journeys and be designed to encourage sustainable travel options and minimise additional car trips for travel across the London boundary. This will be particularly relevant for growth areas or large development sites on cross boundary routes.</p>	<p>The proposed parking standards take account of local higher levels of car ownerships and the more rural nature of our borough. However, we do note the potential for cross boundary journeys. We do not have any large site in the north of the Borough but there are a couple of smaller proposed development sites within Banstead. Surrey County Council are carrying out a transport assessment to model the cumulative impact of all our proposed sites which will enable a good understanding of our traffic movement. In addition, we have worked with our neighbouring authorities to understand schemes which may impact on us, such as the London Cancer Hub in Sutton.</p> <p>Adopted Core Strategy Policy CS17 states that the Council will work with Surrey County Council, Highways England, rail and bus operators, neighbouring local authorities and developers to manage demand and reduce the need to travel by...securing provision of – or easy access to – services, facilities and public transport as part of new development. This is a theme which is carried through into the DMP, with sustainable modes of transport encouraged in a number of policies.</p>	<p>No change</p>
<p><b>SC7 - No gated development</b></p>	<p>Comment is noted - This level of detail is more applicable to a supplementary planning document</p>	<p>No change</p>

<p><b>SC7</b> - This is an opportunity for the borough to work with developers and other stakeholders to push the boundaries in best practice sustainable development and co-ordinated infrastructure planning and delivery. We support the overall aims of the policy and would wish to see improvements to the pedestrian and cycling links to surrounding areas and the riverside and providing a more public open space and landscaping.</p>	<p>Comment is noted - Existing policies in the draft DMP document are already considered to be appropriate to these aims, including OSR2, NHE4, DES1 and CCF2. TAP1 requires that pedestrian and cycle routes are provided in new development, linking to wider networks where possible</p>	
<p>Very important. The whole transport infrastructure needs to be considered not just the entrance to the site.</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions, rather than new major roads (although new access roads will be built to serve large-scale new developments).</p> <p>Infrastructure to support approved developments being built will be funded and / or provided by the developer through planning obligations or financial contributions to the Community Infrastructure Levy. Developers are required to provide or make contributions to the infrastructure needed to support the development planned.</p>	<p>No change</p>

<p>Access to and from new developed areas is often lacking. Traffic is often fed onto local trunk roads that are generally over capacity, especially during peak times. Consideration must be made for better road layouts with Surrey County Council during the planning stage.</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions, rather than new major roads (although new access roads will be built to serve large-scale new developments).</p> <p>Infrastructure to support approved developments being built will be funded and / or provided by the developer through planning obligations or financial contributions to the Community Infrastructure Levy. Developers are required to provide or make contributions to the infrastructure needed to support the development planned.</p>	<p>No change</p>
<p>Good access routes is key however with the proposed increase in both residential and commercial developments we need to make sure local roads are not congested - the recent news of the M23 being converted to managed motorway with no suitable diversion route such as from M23 J9 towards A22 and M25 j6 would be an effective way of managing demand from both our borough, Crawley and Tandridge councils as well as Gatwick vital if it continues to expand even then with the increase of passengers per aircraft this measure could still be effective at reducing congestion.</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions, rather than new major roads (although new access roads will be built to serve large-scale new developments).</p> <p>Infrastructure to support approved developments being built will be funded and / or provided by the developer through planning obligations or financial contributions to the Community Infrastructure Levy. Developers are required to provide or make contributions to the</p>	<p>No change</p>

	<p>infrastructure needed to support the development planned.</p>	
<p>TAP1 - currently most roads across the borough are crowded with all day parked cars and are not wide enough, making access difficult and causing traffic delays. all junctions should have double yellow lines to a 12 metre distance from the junction on all sites, also that parking is allowed on one side of the road only or alternate even and odd dates. The problems of all day parking in residential roads throughout the borough generated by offices and London commuters has not been addressed in the local plan and neither does there seem to be any cohesive plan for an efficient and reliable public transport scheme.</p>	<p>Policy TAP1 requires the following:</p> <p>that any proposed development must ensure access by service vehicles (including refuse vehicles) and emergency vehicles at all times without restriction, including adequate width to ensure there is no obstruction from parked vehicles. On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where possible.</p> <p>Parking standards have been revised and are a minimum rather than maximums as they were previously</p> <p>The adopted Core Strategy sets out that The Council will also work with Surrey County Council to investigate, and where appropriate introduce, Residential and Controlled Parking Zones.</p> <p>The Community Infrastructure Levy can be used to support better public transport. The Borough Council do not actually deliver any public transport but do work with providers. For example, the bus network is mainly controlled by Surrey County Council. Their local bus strategy is available here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf</a></p>	<p>Following text added to Policy TAP1: On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where possible.</p>

<p>I would like you to add to this an extra section saying "while not impacting access for vehicles, pedestrians and cyclists to existing developments"</p>	<p>The objective set the tone and high level context for the relevant sections. However, the actual planning polices set the requirements for new development and <b>TAP1</b> states that new development will be expected to "Provide safe and convenient access for all road users, in a way which would not:</p> <ul style="list-style-type: none"> <li>i. compromise the free flow of traffic on the public highway, pedestrians or any other transport mode, including public transport and cycling</li> <li>ii. exacerbate traffic congestion on the <u>existing</u> highway network</li> <li>iii. increase the risk of accidents or endanger the safety of road users including pedestrians, cyclists, and other vulnerable road users</li> </ul> <p>All of the above should include consideration of <u>cumulative impacts of development in the locality</u></p>	<p>No change</p>
<p>It is unclear how the highway network will accommodate the additional traffic from urban extensions. For example, at Woodhatch there are junction capacity problems as well as severe congestion on the A217 into Reigate which itself is often grid locked. The Surrey County Council infrastructure study showed a large deficit in funding to provide the necessary infrastructure, including public transport and highway capacity. The transport study which provides supporting evidence to the DMP also shows that several roads are at capacity and junction delays will increase, yet there are no proposals to mitigate the problems arising from new development.</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions, rather than new major roads (although new access roads will be built to serve large-scale new developments).</p> <p>Site allocations include mitigation that would be required to make any development permissible. Infrastructure to support approved developments being built will be funded and / or provided by the developer through planning obligations or financial contributions to the Community Infrastructure Levy. Developers are</p>	<p>No change</p>

	required to provide or make contributions to the infrastructure needed to support the development planned.	
<p>Since many proposed sites are out of the town centres, this is going to add traffic to existing busy roads as people access town centres, causing further traffic issues. For example ERM2, ERM3, ERM1 could add 300 houses and associated traffic onto the already over-crowded A25 heading down Redstone Hill. Self-reliant communities will be limited in the scale of developments proposed - town centres will still be a bigger draw.</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions, rather than new major roads (although new access roads will be built to serve large-scale new developments).</p> <p>Site allocations include mitigation that would be required to make any development permissible. Infrastructure to support approved developments being built will be funded and / or provided by the developer through planning obligations or financial contributions to the Community Infrastructure Levy. Developers are required to provide or make contributions to the infrastructure needed to support the development planned.</p>	No change
<p>Is a pedestrian crossing planned for the dangerous A217 crossing near Green Lane?</p> <p>The state of the main road into the centre of Horley is badly potholed and dangerous.</p> <p><b>Redhill</b> - Redhill centre is an Island with access only across busy roads. This deters people from visiting and also congests the roads around due to the many crossing points, A better access route is desirable .</p>	<p>Surrey County Council are in charge of the existing highways - more information can be found here: <a href="https://www.surreycc.gov.uk/roads-and-transport">https://www.surreycc.gov.uk/roads-and-transport</a></p> <p>Surrey County Council are in charge of the existing highways and potholes - you can report potholes online here: <a href="https://www9.surreycc.gov.uk/highwayproblem/LocateProblem.aspx?GISDefectTypeId=8">https://www9.surreycc.gov.uk/highwayproblem/LocateProblem.aspx?GISDefectTypeId=8</a></p>	No change

<p>More 'no through access' and 'slow' signs should be used to prevent rat runs.</p>	<p>Surrey County Council are responsible for highways including signage . See the link below for further information on these:</p> <p>- information on requests for new signage  <a href="https://www.surreycc.gov.uk/roads-and-transport/road-maintenance-and-cleaning/street-lights-traffic-signals-and-signs/non-illuminated-signs-and-bollards/requesting-or-enquiring-about-new-non-illuminated-signs-and-bollards">https://www.surreycc.gov.uk/roads-and-transport/road-maintenance-and-cleaning/street-lights-traffic-signals-and-signs/non-illuminated-signs-and-bollards/requesting-or-enquiring-about-new-non-illuminated-signs-and-bollards</a></p>	
<p>TAP1 - Active approach to sustainable public transport to better manage demand is preferred against the initial building of new infrastructure which should be viewed as a final resort.</p> <p>The sustainable transport initiatives contained with para 3 are welcomed and our thoughts were that this para could be more prominent within the policy such that it was in the forefront of any applicants considerations along with enhancement of existing public transport services prior to considerations about highway improvements.</p>	<p>Comment is noted</p>	<p>No change</p>
<p>Along the Smallfield Road there are several small developments - there should be footpaths which mean easy access between them, not requiring going onto the Smallfield Road.</p>	<p>This is not within the remit of the Development Management Plan.</p>	<p>No change</p>



<p>Access into Horley must be improved from the east. The subway and railway footbridge are in an embarrassing state and do not provide a feeling of safety or a reason to be proud.</p>	<p>The proposed developmetn site HOR1 - High Street Car Park states that improvements to the existing subway adjacent to the site would be required to support development of the site</p>	<p>No change</p>
<p>the fact the Highway Authority is clear that it is not entirely responsible for the impact of traffic. I have been trying to draw this to the attention of officers for at least 10 years without success. In particular the Highway Authority states in a number of references that it is not responsible for considerations such as impact on residential amenity or the impact of traffic on the character of roads. They say these matters are beyond the Council's remit as the local highway authority responding to planning applications. Responsibility for these issues therefore rest with us but I am not clear if our DMP will accept them and therefore safeguard our residents accordingly.</p> <p>In particular I see these problems in roads where one development is approved after another. Each time it is said the impact is satisfactory but no account is taken of the total impact of all the new developments in one road. Ruden way, Nork Way and Fir tree Road in Nork have clearly been severely impacted by these new developments.</p>	<p>Comment is noted. Inclusion of wording to DES1 as follow:</p> <p>10) Makes adequate provision for access, parking, servicing, circulation and turning space, <u>and parking, taking account of the impact on local character and residential amenity, including the visual impact of parked vehicles</u></p> <p>DES2 (back garden land) has also been updated to include the following:</p> <p>d) Provide well designed access roads, with space for suitable landscaping and maintaining separation to neighbouring properties</p>	<p>Inclusion of wording to DES1 as follow:</p> <p>10) Makes adequate provision for access, parking, servicing, circulation and turning space, <u>and parking, taking account of the impact on local character and residential amenity, including the visual impact of parked vehicles</u></p> <p>DES2 updated with "d) Provide well designed access roads, with space for suitable</p>

		landscaping and maintaining separation to neighbouring properties"
<b>Policy TAP1</b> - what are the remedies available to the Council if the travel plan is not adhered to? It seems especially difficult to create leverage once the construction phase has ended. We question whether this policy is worth anything?	A travel plan will be a condition attached to a planning application, if this is not adhered to then appropriate enforcement would be required	No change
Concerned that TAP1 is not supported by a minimum requirement for the access road to back garden developments. Standards for access in new developments are set out nationally in the Manual for Streets (2007) and locally in the Technical Appendix to Surrey Design (2002).The Technical Appendix was produced by the Surrey Local Government Association and adopted as supplementary planning guidance by all Surrey authorities and is therefore a material consideration in deciding planning applications. It sets out common standards for road widths, etc. to accommodate all types of vehicles, including refuse freighters.  3.4. Members have often questioned whether the roads in new residential areas will be adequate for refuse collection, particularly in terms of the width of access drives serving housing developments of up to six dwellings. The relevant standards for the width of these	This would be too descriptive which would not be in line with national policy. However, Policy TAP1 requires the following:  b) Incorporate a highway design and layout that: i. complies with currently adopted highway standards and guidance, including roads which will not be adopted by the Highways Authority unless evidence can be provided to clearly demonstrate a scheme would be safe, accessible and in accordance with other policies,  .ii. provides adequate access in particular with regard to circulation, manoeuvring, turning space, visibility splays and provision for loading/unloading for an appropriate range of vehicles.  iii. Allows for access by service vehicles (including refuse vehicles) and emergency vehicles at all times	TAP1 has been updated to be clearer on requirement for all roads to be designed to adoptable standards.

<p>driveways in the Technical Appendix to Surrey Design are:          "The minimum width of a domestic driveway is 2.75m but where driveways are likely to be used by service vehicles or serve parking courts they should be a minimum of 3m wide. Where dwellings are more than 45 metres from the highway, the design of the driveway should provide a 3.7m wide corridor free of obstacles to fire appliance access. Driveways should be widened to 4.1m where parking may regularly occur or where they regularly provide pedestrian access. Single driveways should not exceed a width of 3.2m at the highway boundary."</p> <p>3.5. We understand that the Borough's Neighbourhood Services requested the 4.1m width as standard in some instances but this was not accepted at the time by planning officers. This standard 4.1m width requirement also appeared in an early draft of guidance for developers. In our experience, the access roads to our new cul-de-sac developments regularly have parked cars in them and service vehicles are denied access or only have access with extreme difficulty. We therefore suggest that these access roads should be a minimum of 4.1m.</p>	<p>without restriction, including adequate width to ensure there is no obstruction from parked vehicles. On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where possible.</p> <p>ii.iv. achieves a permeable highway layout, connecting with the existing highway network safely and includes safe access for pedestrians and cyclists</p> <p>A supplementary planning document will be prepared to support access, parking and servicing policies.</p>	
<p><b>TAP1</b> - There seems little doubt that the Highway Authority does not consider the impact on residential amenity or the impact of traffic on the character of roads. We believe that the RBBC should take responsibility for this and that the DMP is your opportunity to do so. Every new development in the Nork area attracts, on average, two new cars to the</p>	<p>Comment is noted. Inclusion of wording to DES1 as follow:</p> <p>10) Makes adequate provision for access, parking, servicing, circulation and turning space, <u>and parking, taking account of the impact on local character and residential amenity, including the visual impact of</u></p>	<p>Inclusion of wording to DES1 as follow:</p> <p>10) Makes adequate provision for</p>

<p>area. The cumulative impact on parking and traffic has transformed some roads from a previously semi-rural, village, type character to that of an urban townscape. Policies should be in place to avoid the degradation of an area's character in this manner.</p>	<p><u>parked vehicles</u></p>	<p>access, parking, servicing, circulation and turning space, <u>and parking, taking account of the impact on local character and residential amenity, including the visual impact of parked vehicles</u></p>
<p><b>TAP1</b> - We strongly advise that proposed policy TAP1 is amended to take account of the suggested amendments and comments highlighted in red below:</p> <p>bi) Comment: The Highway Authority does not require roads that are to remain private to be designed to the same standards as roads that are to be adopted.</p>	<p>b) i - It is suggested that the wording be amended to read "complies with currently adopted highway standards and guidance, including roads which will not be adopted by the Highways Authority, unless evidence can be provided to clearly demonstrate a scheme would be safe, accessible and in accordance with other policies."</p> <p>It is appreciated that the Highway Authority does not require roads which will remain private to be designed to the same standards as roads that are to be adopted but the Borough Council would like to see a consistent approach to delivery of roads unless evidence can show that a private road scheme would be safe, accessible and in accordance with other policies, the latter wording recognising that innovative design should not be stifled.</p>	<p>b) i - wording be amended to read "complies with currently adopted highway standards and guidance, including roads which will not be adopted by the Highways Authority, unless evidence can be provided to clearly demonstrate a scheme would</p>

This wording reflects the Surrey Design Guide which states that "The aim of this Appendix is to ensure a high standard of design in line with the objectives of Surrey Design. Schemes with road layouts that meet this standard of design will also be adoptable by the Highway Authority. Even if it is not the intention of the developer to have the roads adopted, the design requirements will still apply."

Manual for streets also notes that: "Where a developer wishes the streets to remain private, some highway authorities have entered into planning obligations with the developer under section 106 of the Town and Country Planning Act 1990,16 which requires the developer to construct the new streets to the authority's standards and to maintain them in good condition at all times."

However, Manual for Streets also recognises that strict adherence to standards can restrict good design hence the suggestion of further wording to support a more flexible approach.

be safe,  
accessible and  
in accordance  
with other  
policies."

**TAP1** - We strongly advise that proposed policy TAP1 is amended to take account of the suggested amendments and comments highlighted in red below:

b iii. Comment: Does this just apply to new roads within a development, or does it also apply to new development on existing roads? There are existing residential roads in the borough where access by service and emergency vehicles is already hindered or restricted by parked cars and the narrow width of the carriageway. If new developments on these roads were to lead to additional cars parking on the carriageway, the county council's transport development planning team would only object if it was considered that the additional cars would materially worsen the existing situation.

b) iii - It is proposed that the following be added to the policy to clarify the difference between new roads and existing road layouts: "allows access by service vehicles (including refuse vehicles) and emergency vehicles at all times without restriction, including adequate width to ensure there is no obstruction from parked vehicles. On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where possible."

b(iii) amended to read: "allows access by service vehicles (including refuse vehicles) and emergency vehicles at all times without restriction, including adequate width to ensure there is no obstruction from parked vehicles. On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where possible."

2) For developments which are likely to generate significant amounts of movement, a Transport Assessment and a Travel Plan will be required.

c) Comments: the county council’s transport development planning team is not happy with the wording of (c) for two reasons: First, when assessing the car parking provision in new developments, the Highway Authority will always take into account specific local circumstances, such as the accessibility of the location and local levels of car ownership. So if a new development is located in a very accessible location, the Highway Authority will usually accept a reduced parking provision. Therefore, the level of car parking proposed may not always accord with adopted standards but may still be considered adequate.

Second, the wording of the last sentence is ambiguous, as it is not clear what would be classed as an “unacceptable impact” on on-street parking. It should be noted that the county council’s transport development planning team will only raise objections regarding parking if there is a shortfall that would lead to danger on the adjoining highway, e.g. if displacement parking were to take place in locations where it would be considered dangerous such as at a junction, or where it would create an obstruction or safety hazard to other highway users such as on a footway. The county council’s transport development planning team will not raise objections to a shortfall in parking on amenity grounds. If a new development were to lead to displacement parking on a road where

2) Transport assessment added

2c) this has been simplified to state that development must "include adequate car parking and cycle storage for residential and non-residential development in accordance with adopted local quantity and size standards (see Annex 4)." In high accessibility areas, we have caveated that parking can be reduced if there is robust evidence around local level of car ownership.

Comment is noted on impact on on-street parking. It is proposed that wording is updated as follows: "Development should not result in unacceptable levels of on-street parking demand in existing or new streets." It is felt that this is clearer that it is about parking pressure, which as you note is something that the LPA can take into consideration.

Transport assessment added

Adequate removed from TAP1 2c) and wording is updated as follows:  
 "Development should not result in unacceptable levels of on-street parking demand in existing or new streets." It is felt that this is clearer that it is about parking pressure, which as you note is something that the LPA can take into consideration.

<p>there is already high demand/pressure for on-street parking, this would not necessarily result in a highway safety issue. It is for the Local Planning Authority to consider whether displacement parking from a development would adversely affect the amenities of local residents, or detract from the character of the area.</p>		
<p><b>TAP1(1b[i])</b> - At the end of the first sentence, add 'although taking into account exceptional circumstances'. The reason for this insert is a current case where the sight lines just about meet the standard guidance but take no account of proximity to a busy highway and high speeds, leading to highway safety concerns.</p>	<p>Comment is noted. Wording has been updated to recognise that there may be circumstances where deviation from standards is appropriate</p>	<p>Reference to loading/unloading in TAP1</p>
<p><b>TAP1</b> - Part 1 b) of the proposed policy requires development to incorporate a highway design and layout that complies with adopted highway standards, including roads that are not to be adopted by the Highways Authority. This is considered unduly prescriptive. There maybe some instances where there is justification for highways not to be designed to adopted standards, particularly where it would otherwise be acceptable in planning terms, and where demonstrated via a road safety audit.</p>	<p>Comment is noted. Wording has been updated to recognise that there may be circumstances where deviation from standards is appropriate</p>	<p>b) i - wording be amended to read "complies with currently adopted highway standards and guidance, including roads which will not be adopted by the Highways Authority, unless evidence can be provided to clearly</p>



		<p>demonstrate a scheme would be safe, accessible and in accordance with other policies."</p>
<p><b>TAP1</b> - We strongly advise that proposed policy TAP1 is amended to take account of the suggested amendments and comments highlighted in red below:</p> <p>1) All types of development, across the borough, will be expected to:</p> <p>a) Provide safe and convenient access for all road users, in a way which would not:</p> <p>i. unnecessarily impede the free flow of traffic on the public highway, or compromise pedestrians or any other transport mode, including public transport and cycling          Comment: Development can sometimes interfere unnecessarily with the free flow of traffic on the existing highway, e.g. during the construction phase where traffic management measures such as temporary traffic signals are required to facilitate access by construction vehicles. The word 'unnecessarily' should therefore be added.</p> <p>ii. materially exacerbate traffic congestion on the existing highway network          Comment: Development that involves an increase in dwellings or gross floor area may lead to an increase in vehicular movements, and hence could result in</p>	<p>1(i) - 'unnecessarily impede' and 'or compromise' added          1(ii) - 'materially' added          1(iii) - comment is noted</p>	<p>Suggested wording added to TAP1</p>

<p>increased traffic congestion on the local highway network. However, the county council’s transport development planning team would only object if it was considered that the increase in traffic would have a material or severe impact on the safety and operation of the adjoining public highway. The word ‘materially’ should therefore be added.</p> <p>iii. increase the risk of accidents or endanger the safety of road users including pedestrians, cyclists, and other vulnerable road users All of the above should include consideration of cumulative impacts of development in the locality. Comment: Although the cumulative impacts of development will be considered, it should be noted that the county council’s transport development planning team will continue to assess each and every planning application on its own merits, taking into account site-specific considerations.</p>		
<p>The section entitled Policy Context for TAP1 -2 sets out relevant paragraphs from the NPPF and Core Strategy on transport related matters. However, there are some key paragraphs/sentences that have not been included. We therefore recommend inclusion of the red text, as indicated below, is incorporated in the Policy Context.</p> <p>National Planning Policy Framework Para 29: Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives... The transport system needs to be</p>	<p>Added to para 29 "The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However,"</p> <p>Para 32 added</p> <p>Added to para 34 "the need to travel will be minimised and"</p> <p>For Core Strategy CS17 the reference to "Manage demand and reduce the need to travel by: allocating</p>	<p>Text added to policy section</p>

balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.

Para 32: [to be added] All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether: the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure; safe and suitable access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

Para 34: Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.

Core Strategy  
 Policy CS17: The Council will work with Surrey County Council, Highways England, rail and bus operators, neighbouring local authorities and developers to:

- Manage demand and reduce the need to travel by:

land for development and directing development to accessible locations in the borough" is not relevant to this section which is about transport (this is dealt with in other sections of the document), so has not been added

Added to para7.8.8 of the Core Strategy "taking into account the accessibility of different locations and levels of car ownership."

allocating land for development and directing development to accessible locations in the borough; securing provision of - or easy access to - services, facilities and public transport as part of new development

- Facilitate sustainable travel choices by: improving travel options through enhanced provision for bus, rail, walking, cycling and bridleways; promoting walking and cycling and the preferred travel option for shorter journeys; promoting non-car travel; requiring the provision of travel plans and transport assessments for proposals which are likely to generate significant amounts of movement; and seeking to minimise parking provision in the most sustainable locations and secure adequate parking provision relative to patterns of car ownership elsewhere

Para 7.8.8: The Council will develop detailed policies in relation to parking in the DMP and supplementary guidance. These will set out graduated standards for different areas of the borough to ensure that car parking does not detract from the character of the area and encourages sustainable modes of transport, taking into account the accessibility of different locations and levels of car ownership.

Page 74 Policy TAP1, especially clauses (a) and (b)iii: The Council is surprised that the Transport Assessment appears to devote little or no attention to the junction A23/Three Arch Road which already causes massive congestion at all times of day. This is particularly important in regard to ambulance access to the hospital, and fire engines up A23 from Salfords. The commercial estate proposed at Balcombe Road, Horley, , and the additional housing South of Reigate and East of Redhill, as well as the houses to be constructed in NW sector of Horley, will all make this worse. The same applies to A217/Prices Lane junction at Woodhatch. A major re-organisation of both these junctions is required. The Council also has concerns about the Lodge Lane/A23 junction, as it remains extremely dangerous, also about the Cross Oak Lane/A23 junction where the traffic lights cause serious congestion on the A23, a situation which will worsen when the new road to/from the North-west development is added to the junction. We strongly support Policy TAP2, and it should be enforced properly. Parking at hotels and guest houses should be only for people who are actually staying there at the time, or who are present in the hotel for a meal or function

The A23 / three Arch Road junction is considered in Surrey County Council's 2016 Transport Assessment of our Regulation 18 DM Plan. Surrey County Council, as Highways Authority has assessed this to consider the impact of planned development.

Table 4.7 of the Transport Assessment shows that both signalised junctions which you refer to would operate within the acceptable limits of quantitative Ratio of Flow to Capacity (under 0.9 for signalised junctions) and qualitative Level of Service (LOS). This means that they both have scope to accommodate the planned future growth.

In the Scenario 5 modelling, the A23 Horley Road junction with Three Arch Road and Maple Road, Earlswood shows that it would operate at a Level of Service (LOS) C (orange), and at a Ratio of Flow to Capacity (RFC) of 0.67...

In the Scenario 7 (the greatest level of development), the A217/Prices Lane junction at Woodhatch would operate at a Level of Service (LOS) of E (red), and at a Ratio of Flow to Capacity (RFC) of 0.72...

However, as the A217/Prices Lane junction at Woodhatch would experience large delays of at least 50 seconds, identified (at para 4.6.10 and Table 4.14) as a Network hotspot, it is suggested that some mitigation is likely to be required.

These are referred to in the accompanying Infrastructure Delivery Plan, June 2016 as : "Developer to fund feasibility Study and where necessary contribute to any improvements and

Policy TAP1a) updated to ensure consistency with NPPF

	<p>interventions, required to mitigate the impact of additional traffic on, and improve safety for pedestrians/cyclists at Woodhatch junction.”                  The IDP Addendum 2016 also includes “upgrading of junction and signal controls to enable real-time alterations to timing/signal patterns (18 separate locations on A23 corridor – including Three Arch Road junction.”</p> <p>The Transport Assessment did not find there to be any issue of concern at either of the other junctions you refer to.</p> <p>We have slightly amended the wording of Policy TAP1a), to better reflect national policy (NPPF 2012, paragraph 32).</p>	
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PARKING		
<p>Realistically a minimum of 2 spaces per unit as most households have 2/3 cars these days, plus visitor spaces. Less than that, or no parking, pushes more cars onto the surrounding streets/roadside which causes congestion.</p>	<p>The parking standards are based on evidence of the number of cars owned by different kinds of households - in many cases, this is less than 2 or 3 cars, and it would be inappropriate to introduce more parking spaces than our evidence demonstrates is necessary.</p>	<p>N/A</p>

sufficient parking compared to bedroom number per property. 1 or 2 car park spaces for a 4- or 5-bedroom house is simply NOT enough.	The parking standards are based on evidence of the number of cars owned by different kinds of households.	N/A
By adequate that means one car space per bedroom plus visitor spaces.	The parking standards are based on evidence of the number of cars owned by different kinds of households - there is no evidence that, on average, households own one car for each bedroom.	N/A
There should be recognition that adequate visitors' parking should be provided in all new developments.	This is noted, and the standards now try to provide appropriate amounts of visitor parking.	Visitor parking has been added to the parking standards.
Less parking will not stop people from owning cars. Much more parking space is needed in new developments - building houses with driveways would help as well as having your allocated parking space right in front of your house.	The parking standards are based on evidence of the number of cars owned by different kinds of households. Driveways and decent-sized garages will be encouraged. However, space on the road in front of houses cannot be reserved for the homeowner, except in the case of disabled spaces - the highway is public, not private space.	N/A
<p>This is the South East and all property is expensive and purchasers will almost certainly have a car. The Council MUST recognise that people in borough will almost certainly own at least one car.</p> <p>By all means get a public transport option going but having a bus service through the development is unlikely to change the desire for car ownership and parking.</p> <p>Having seen the impact of recent developments is must be accepted that parking provision is</p>	<p>In line with national policy, our policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as sustainable transport choices for those who rely on or choose to use these transport modes.</p>	No change

<p>paramount. Social engineering won't make people make more sustainable transport choices therefore parking provision must be increased/improved.</p>		
<p>The elderly population is prominent, they are not going to cycle or get on a bus, even with a free bus pass, they go by car.Reducing parking will impact elderly peoples quality of life.</p>	<p>In line with national policy, our policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as sustainable transport choices for those who rely on or choose to use these transport modes.</p>	<p>No change</p>



<p>Parking standards should not be minimums. Developers will work towards these standards and object to anything higher.</p>	<p>The parking standard figures proposed are based on research around average car ownership in specific areas/wards. A standard growth factor is then applied to reflect what car ownership may be by the end of the plan period (2027) to enable future proofing (i.e. we need to ensure that parking provision is flexible enough to support future car ownership levels). This number is then refined using local knowledge, for example through discussions with residents associations, to create the minimum numbers, which is only the starting point.</p> <p>When a planning application is prepared it starts off with the minimum parking standards but then adjusts them using the criteria in Annex 4 which adapts the parking requirement in line with the accessibility of the development, type of housing, if there is allocated/unallocated parking. In addition, the document states that "The intention is for standards to be provided as a guide and they may be varied at the discretion of the Council to take into account specific local circumstances". This ensures all developments should be taken on a case by case basis, taking account of local circumstances and reflect that there can be extremes in more localised areas.</p>	<p>No change</p>
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<p>The proposed parking standards will increase congestion through increased on-street parking - Pavement parking is a particular problem locally. If parking provision is not there, cars will spill out onto highways.</p>	<p>The need for on or off street parking will vary depending on the local context - for example some areas may not have parking stress and are located in an accessible location, and so be able to accommodate small developments without onsite parking. However, our policies reflect that there is a high level of car ownership and sites which are assessed as being in medium or low accessibility areas (based on a set of weighted criteria) have a minimum amount of parking which has to be allocated off-street. To mitigate impacts, the document notes that "Development should not have an unacceptable impact on on-street parking".</p>	<p>No change</p>
<p>New application at 2 Blandford Road has wholly inadequate parking. The car parking for the flats at Galahad court next to Redhill station have 2 spaces per flat (2 bed flats) and this seems the ideal solution (some are even under the building!)</p>	<p>This is a matter for Development Management and that specific development, rather than for the DMP.</p>	<p>No change</p>
<p>If there are 2 bed flats (upwards) there should be provision of 2 car parking spaces for that flat. It is then up to the resident if they don't need it - they can rent it out!?! It is rare for families to have only 1 car. I appreciate you can't go back to add more parking to existing houses but R&amp;B Council CAN make sure new housing has at least 2 spaces per unit.</p>	<p>The parking standards are based on evidence of the number of cars owned by different kinds of households.</p>	<p>No change</p>
<p>High accessibility dwellings larger than 3 bed flats Regardless of accessibility, the minimum standard must recognise the likely occupancy levels of such larger properties and hence car ownership. Require 2 spaces for 4 bed flats, 3/4 bed houses and 5+ bed</p>	<p>The parking standards are based on evidence of the number of cars owned by different kinds of households.</p>	<p>No change</p>

houses and flats.		
<p>Local planning applications have not sought this in the past so why this question.</p> <p>A 5 bed house with 1 or 2 parking spaces &amp; little visitor parking is totally insufficient.</p> <p>Many new homes do not include enough parking (38 Albert Road North) as an example with only 1x space per 3/4 bed house. This is not enough in already congested areas.</p>	<p>The parking standards are based on evidence of the number of cars owned by different kinds of households. The standards now aim to provide a suitable amount of visitor parking.</p>	<p>Visitor parking has been added to the parking standards.</p>
<p>It is considered that there is the potential for car free development in highly accessible and sustainable locations, particularly for smaller 1 and 2 bedroom flats where occupiers are less likely to own a car. It is noted that the Council have established walking accessibility maps around town centres and railway stations. It is suggested that car free developments are permitted in areas recognised as having the highest accessibility as part of the justification for the parking standards.</p>	<p>It is noted that in town centre locations, and particularly within Redhill, a lower level of parking provision may be appropriate.</p>	<p>"Research shows that there are different car use characteristics in the Redhill East and Redhill West Wards. Consequently, a lower amount of parking may be required in these wards and in areas within or close to town centres" added to parking standards</p>

<p><b>TAP 1c)</b> This is so important we must provide off street parking for each new development so that on street parking is left for visitors deliveries etc. Must current development have narrow roads that do not allow for on street parking. I should like to see this redressed even if it is by way of parking bays between property entrances.</p> <p>I have deliberately upped most parking spaces required. Our officers must be given some flexibility id a development would fail because there were 2 or 3 parking spaces short. Many years ago I had a 5 house development that could not be built because it required underground parking. Had we been able to drop 3 spaces we would not have need underground parking.</p> <p>The parking spaces for large retail units above 500m<sup>2</sup> MUST be a minimum not a maximum.</p>	<p>It is expected that the majority of new developments will provide allocated parking, which would therefore need to be off the road. In some cases in high accessibility areas, it may be more appropriate to provide limited parking within the new development. To mitigate impacts, the document notes that "Development should not have an unacceptable impact on on-street parking".</p> <p>In terms of retail parking, it is not considered appropriate to over-provide parking, and the figures remain a maximum.</p>	No change
<p>It is difficult to understand why flats have a lower requirement than houses. In reality flats are quite likely to be in multiple occupation and it could perhaps be argued that more rather than less space is needed in such situations.</p>	<p>The parking standard figures have been calculated using the 2011 Census data which has then been increased using projection software to provide an estimated figure for 2027 (the end of the plan period). The data illustrates that there is a noticable difference between average house and flat car ownership, hence the differentiation.</p>	No change
<p><b>SCC</b> - To make this policy effective, R&amp;B must get SCC on side to its implementation as too often no highways objections are made because development applications are offering only lip service to highways issues. Chipstead already has</p>	Noted.	No change

<p>significant traffic congestion and speed issues and even though development in the area is limited, it will exacerbate the situation.</p>		
<p><b>SCC</b> - We suggest another policy 'The Council reserves the right to override the Highway Authority's advice when it considers appropriate, appointing its own highway consultants if required'. We appreciate that this may not be an acceptable policy but something needs to be done to address the situation whereby the highway authority fails to object to planning applications despite problems of safety and severe congestion.</p>	<p>The Highway Authority is the relevant authority for roads, and the Council cannot simply ignore them in making planning decisions.</p>	<p>No change</p>
<p>Standard for cycle parking - The standards for car parking set out in Annex 4 are based on assessments of different levels of accessibility. However, this classification has only been considered to determine the level of car parking. It could also be used to determine the minimum amount of secure cycle parking. We propose a cycle parking standard, requiring minimum standards for secure cycle parking for all new residential developments, and general (not necessarily secure) cycle parking standards for workplaces. This should be higher in locations classified as more sustainable locations. Exceeding the minimum cycle parking standards in high and medium accessibility sites should be acceptable as an alternative to meeting the minimum car parking standards for such sites.</p>	<p>Cycle parking standards have now been added for residential and non-residential developments. No differentiation has been made for accessibility, as it is felt equally appropriate to encourage cycling in all locations. It is not, however, felt appropriate to reduce car parking standards in exchange for more cycle parking spaces, as in many cases cyclists will also own a car.</p>	<p>Cycle parking standards have been added to parking standards.</p>

<p><b>TAP 1(1a)</b> - concerned that the Council will not be prepared to implement it and refuse applications which are harmful to an area if Surrey County Council, as Highway Authority makes no objections. It is unsatisfactory that Surrey County Council, in its role as Highway Authority, does not take into account cumulative impact or the impact on residential amenity.</p>	<p>SCC/the Highway Authority are responsible for roads, and it would be unwise for the Council to reject an application purely on the basis of road impacts if there were no objections from SCC, as this rejection would likely be overturned on appeal.</p>	<p>No change</p>
<p><b>TAP1</b> - Except for paragraph 3c these policy statements are uncontroversial. The sentiment is admirable but they must involve consideration of the adequacy and means of public transport. In this respect the policy needs improvement. A fundamental problem for the borough is that public transport policy and delivery is the responsibility of Surrey County Council, the borough has little power here. Nevertheless, the borough should formulate and actively promote public transport plans to the county that it feels are necessary and compliant with its aims in TAP1 3c. It should be emphasized that the borough's plans for Banstead Village as a vibrant and useful local town centre, as well as serving as a local transport hub, could only be fully realized if there were public transport facilities to it from all of its satellite communities. Burgh Heath and Kingswood are two examples of communities that would be isolated from Banstead were it not for the use of cars. There must be a realization that good public transport reduces car use and alleviates parking difficulties in town centres.</p>	<p>The point is well-made and noted, and the Council will continue to liaise closely with SCC in this matter.</p>	<p>No change</p>

<p><b>TAP1</b> - Parking is not sufficient for current requirements and current developments</p>	<p>It is acknowledged that parking is an issue in the borough so the parking standards have been revised from those which are currently used. To mitigate impacts, the document notes that "Development should not have an unacceptable impact on on-street parking".</p>	<p>No change</p>
<p><b>TAP1</b> - should be extended to deal with existing on-street commuter parking, which is a particular problem in Redhill, where many commuters appear to be leaving the area by train either to work elsewhere, or to go abroad for short periods from Gatwick airport. This creates problems of safe access by car into and out of the drives of existing houses, because sightlines are blocked by cars parked right up to driveway entrances, blocks some pavements for pedestrians (especially those with child buggies and on mobility scooters) and reduces road space and sightlines for other drivers (just look at the situation in Hatchlands Road, Redhill opposite the Law Courts). A comprehensive programme of residents' and school access parking permits is needed, and active measures taken to discourage freeloading commuters currently avoiding paying for their parking and imposing detriment and disamenity on local residents and road/pavement users.</p>	<p>The point is noted, but on street parking is more of an issue for Surrey County Council, as they are responsible for roads. If cars are parked in an illegal or dangerous matter, this should be reported to the police.</p>	<p>No change</p>

<p><b>TAP1</b> - We understand that 1)b)iii) includes access for full-sized refuse vehicles, and this is covered under the phrase 'service vehicles'. It is important to ensure that new developments can be accessed to our standard-sized vehicles so that more properties do not need servicing by smaller vehicles, costing the Council money. If necessary, can this wording be strengthened to ensure it is as strong as possible so this requirement can be upheld at planning appeal if necessary?</p> <p>Is 1d) enforceable? Please review wording, including whether the phrase 'wider sustainable transport network' is defined clearly enough. For example, can it be clarified to mean bus routes and existing cycle paths?</p> <p>We note that 2) includes the phrase 'likely to generate significant amounts of movement'. What does this mean, and can it be upheld at appeal? Is it possible to define this more clearly?</p>	<p>Refuse vehicles specifically mentioned</p> <p>Examples of bus routes and existing cycle paths included and where possible included to recognise that this may not always be possible</p> <p>"significant amount of movement" is directly taken from the National Planning Policy Framework. The guidance states: "Local planning authorities must make a judgement as to whether a proposed development would generate significant amounts of movement on a case by case basis (ie significance may be a lower threshold where road capacity is already stretched or a higher threshold for a development which proposes no car parking in an area of high public transport accessibility)."</p>	<p>Refuse vehicles specifically mentioned</p> <p>Examples of bus routes and existing cycle paths included and where possible included to recognise that this may not always be possible</p>
<p><b>TAP1(1c)</b> - There is concern that the parking standards in annex 4 are inadequate, taking into account modern layouts which frequently do not provide space for visitors parking, the trend to bring work vehicles home, including sizeable vans, higher car ownership rates per family and increasingly inadequate public transport. A problem is experienced in Nork where the access roads to backland development are used for parking, thus preventing emergency vehicles and refuse vehicles gaining access. This highlights the need to consider</p>	<p>The parking standards are based on evidence of the number of cars owned by different kinds of households, and the basis of the parking standards is included in a background evidence document. It has been recognised that visitor parking should be added to the standards.</p>	<p>Visitor parking has been added to the parking standards.</p>



<p>both parking and road widths when considering new developments. The whole basis of the accessibility calculations is spurious</p>		
<p><b>TAP1(2)</b> - We suggest that there should be an addition to the policy which states – ‘and this will be regularly monitored and updated if necessary, with clear indications of who is responsible for ensuring compliance’. The reason for the insert is to ensure that when the measures are adopted they will continue until circumstances change.</p>	<p>A travel plan will be a condition attached to a planning application, if this is not adhered to then appropriate enforcement would be required</p>	<p>No change</p>
<p><b>TAP1:</b> Impact on on-street parking Requiring demonstration of “unacceptable impact on on-street parking” is an extremely high bar to meet.</p>	<p>It is unclear why this is considered unreasonable, or what standard should be put in its place instead.</p>	<p>No change</p>
<p>Any new development, business or residential MUST provide adequate off-street parking.</p>	<p>It is expected that the majority of new developments will provide allocated parking, which would therefore need to be off the road. In some cases in high accessibility areas, it may be more appropriate to provide limited parking within the new development. To mitigate impacts, the document notes that "Development should not have an unacceptable impact on on-street parking".</p>	<p>No change</p>
<p><b>Offices</b> must all provide staff parking to allow for road parking to be further restricted, thus easing traffic flow. Have you tried getting into work on public transport. The council have not made office blocks provide enough parking for their staff in the past.</p>	<p>This is noted, and the standards aim to provide enough parking for offices, although individual developments will have individual circumstances. A large number of people successfully commute into, out of, and across the borough using public transport every day.</p>	<p>No change</p>

<p>Non-residential standards - We strongly object to these being maximum standards with no account being taken of the availability of public transport.</p> <p>In conclusion, although it appears fine on paper to calculate accessibility levels and from that calculate residential car parking requirements, in practice it oversimplifies the complexity of travel patterns and the dependence on the private car. Similarly the non-residential standards need further consideration, especially as no account is taken of accessibility and public transport.</p> <p>We request that all these standards are re-examined and tested on some recent developments.</p>	<p>The residential standards are minimums. The accessibility criteria are partially based around public transport accessibility. The standards are not based on accessibility levels - they are based on data for average car ownership for different kinds of housing. The accessibility levels are then used to adjust for differing levels of car dependence in different areas of the borough. The non-residential standards have been updated, and a difference has been recognised between town centre and other uses where appropriate.</p>	<p>Non-residential parking standards updated.</p>
<p>Less parking would be best way to encourage sustainable transport choices.</p>	<p>This is noted, and is why the standards differentiate between different levels of accessibility - so that people in areas with accessible public transport will be encouraged to use it when appropriate.</p>	<p>No change</p>
<p>In accessible locations, parking should not be provided and steps should be taken to encourage public transport (which would likely need to be enhanced as currently poor). Roads in Surrey are already far too busy and polluted.</p>	<p>This is noted, and is why the standards differentiate between different levels of accessibility - so that people in areas with accessible public transport will be encouraged to use it when appropriate.</p>	<p>No change</p>

<p>Parking in the Borough has been inadequate for a long time. This is not just for new developments, the whole borough needs to look at lack of parking facilities in existing residential areas and do more to promote walking, cycling and buses and discourage car use for small journeys</p>	<p>This is noted, and is why the standards differentiate between different levels of accessibility - so that people in areas with accessible public transport will be encouraged to use it when appropriate. The DMP as a whole aims to provide more mixed use developments, allowing people to make shorter journeys to shops and facilities.</p>	<p>No change</p>
<p>Anticipate the move towards car sharing versus car ownership by providing adequate provision for car club parking/cleaning/recharging.</p>	<p>Policy TAP1 requires more sustainable options, such as car clubs and electric vehicle charging points, to be considered for all types of new development across the borough. A supplementary planning document, which gives further advice on parking standards and design, will also cover this topic in more detail and is currently being prepared.</p>	
<p>Alternative measures The requirement merely to “consider” and “encourage” these measures is very weak. Strengthen the wording – eg set a threshold for size of development above which the developer must demonstrate that these have been considered, or even explicit requirements for car club/EV infrastructure on larger sites.</p>	<p>The policy has been changed to require EV charging points on all new developments, to support the government-backed move towards electric vehicles.</p>	<p>Requirement for electric vehicle charging points added to TAP1.</p>
<p><b>Reigate</b> - I would suggest a comprehensive strategy for long term parking of people who commute into reigate for work. Currently the town is clogging up (outside of the main thoroughfares) and I believe this could become (possibly already is) dangerous as the risk of accidents increases with double parking on victorian streets.</p>	<p>The point is noted, and the Council will continue to monitor this issue and consider improvements.</p>	<p>No change</p>
<p><b>Banstead</b> - Car parking is inadequate for the number of shops in Banstead.</p>	<p>Noted.</p>	<p>No change</p>

<p><b>Banstead</b> - New houses in Banstead must have enough car parking spaces to ensure no additional parking on the high street. If this is not done there will need to be yellow lines along the whole High Street to stop people parking there.</p>	<p>Noted, and the parking standards aim to provide enough parking to ensure that this is the case.</p>	<p>No change</p>
<p><b>Banstead</b> - Objection to any kind of multi-storey car park in Banstead.</p>	<p>Noted.</p>	<p>No change</p>
<p><b>Banstead</b> - Parking in Banstead is currently adequate, new development should be limited to ensure this remains so.</p>	<p>Noted, and the parking standards aim to provide enough parking to ensure that parking from new developments will not have a negative impact.</p>	<p>No change</p>
<p><b>Banstead</b> - The car park by the Priory School in Banstead should be retained.</p>	<p>Noted.</p>	<p>No change</p>
<p><b>Horley</b> - HOR 1 and HOR 5 involve building on existing car parks. Obviously these areas are intended for shoppers but short-term parking is not great around Horley anyway. All of the developments in Horley will put road space under stress owing to the need for parking. Typically in my road, a 3 bedroomed-house may mean that there are 4 people who each have their own vehicle. For one house in Baden Road it was 7 until recently (yes 7 excluding a motor bike!). The recent redevelopment of a care home at the Lee Street end of Court Lodge Road is a truly lamentable example.</p> <p>Over-night cars and light lorries (such as one carrying traffic management equipment!) park entirely on the pavement because there is nowhere else to park. Often vehicles are parked at or in bus stops, making life difficult for bus drivers and causing obstructions when they drop off and pick up passengers.</p>	<p>The parking standards aim to provide enough parking based on data on how many cars are owned by different kinds of households. It is not typical for a 3 bedroom house to have 4 cars, nor is it typical for a household to have 7 cars - although such examples may exist, parking policy cannot be made on the basis of such extremes, or the entire borough would be paved over for parking spaces. The standards have been revised, however, to recognise the need for visitor parking and overnight stays. Parking at bus stops is not allowed, and drivers doing so could be subject to a large fine.</p>	<p>Requirement for additional visitor parking added to parking standards.</p>

<p>Yes there is a nice roundabout on the M23 spur road to which a connection could be made but has anyone really thought about the consequences of this at peak times? It is not a quiet roundabout, with many drivers doing stupid things now without more trying to get on and off on a fourth side. Existing peak time tail-backs from the east and west should not be under-estimated.</p>		
<p><b>Horley</b> - No thought at all has been given to improving infrastructure. Already the car parks and roads within Horley are full of commuters. No thought at all has been given as to where residents should leave their vehicles for commuting purposes let alone additional buses/trains.</p> <p>It is time for a limit to how many cars a resident is allowed to park on public roads. A strict limit should be in place with a large charge if people want additional parking.</p>	<p>Significant thought has been given to infrastructure, in particular, a full transport assessment has been undertaken to evaluate the likely impact of the proposed developments.</p>	<p>No change</p>

<p><b>Horley</b> - several car parks are identified for other uses. But there is no mention of how and where equivalent parking would be provided; unless Borough is relying on local public transport to become the preferred transport mode over private cars. All well and good except that public transport matters are a County responsibility and they would have to develop and fund additional infrastructure for this to happen. Could areas identified for community use be designated for public transport infrastructure use? The current so-called Horley Bus Station, by the rail station, is in completely the wrong location to accommodate major increases in bus provision.</p>	<p>Noted. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p> <p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p>	<p>No change</p>
<p><b>Horley/Car parks</b> - development includes building homes on what are currently public car parks. Parking in Horley is not easy now. Even fewer people will want to visit the town centre.</p>	<p>The DMP aims to provide mixed use developments in Horley to revitalise the town centre, providing improved retail and more town centre residents.</p>	<p>No change</p>
<p><b>Redhill</b> - One other reason why Redhill has stagnated somewhat is the lack of cheap parking. It also does not help that commuter parking has restricted the number of spaces for potential customers who might wish to use the town.</p>	<p>This is not within the remit of the Development Management plan. Any new development will have to include parking in line with updated parking standards</p>	<p>No change</p>

<p><b>Redhill</b> - there needs to be a proper parking strategy for central and edge-of-centre Redhill, which is plagued by on street commuter parking. People need adequate, affordable off-street parking if they are not to clog residential areas. A cheap, multi-story car park (the old cinema site??) is essential.</p>	<p>The parking standards aim to reduce on-street parking as much as possible by providing allocated parking for residents of new developments. New office developments will be required to provide adequate parking for their staff.</p> <p>it is felt that existing parking on recent and existing developments, proposed parking on new town centre developments, and the public transport options to Redhill station should be suitable.</p>	<p>No change</p>
<p><b>Tadworth Village</b> - Need better, cheaper parking, could do with some in Tadworth Village, near station as this is a dangerous spot and busy area and needs better parking there, stop people parking down all the residential roads and this causes problems with traffic in morning.</p>	<p>Noted.</p>	<p>No change</p>
<p><b>The Acres</b> in Horley - one specific bus service for a development of it's size does not inspire confidence that developments of a smaller scale will have their public transport requirements adequately provided for.</p>	<p>The smaller scale developments in Horley are located in the town centre, which already has public transport.</p>	<p>No change</p>
<p><b>The Acres</b> was designed with too little parking and garages that are too small to fit modern cars, and the roads there are not wide enough. The development is horrendously overcrowded with cars impacting on pedestrian/cyclist access, safety and road congestion - you will be hard pushed to find a stretch of yellow line or junction that is not adorned by a leased SUV or bmw of some description. please ensure we learn from these issues in The Acres and new developments incorporate sufficient infrastructure.</p>	<p>Noted, and the parking standards aim to provide enough parking on developments to avoid these problems, including setting a minimum size for garages to be considered as parking spaces.</p>	<p>No change</p>

<p><b>Watercolour</b> is not adequately catered for with respect to car parking facilities. I believe the exact same will happen again.</p>	<p>The DMP does not deal with existing developments, but aims to provide enough parking on future developments to ensure that they are adequately catered for.</p>	<p>No change</p>
<p><b>Commuters</b> - Parking, especially along the streets in Reigate and Redhill anywhere near the railway stations, is becoming more and more difficult and making many roads more and more difficult to drive through during the day. Could you maybe plan for something like a minibus service, running various routes around the estates to pick up commuters, at a reasonable price and with high frequency during the morning- and evening rush hours?</p>	<p>This is not within the remit of the Development Management plan. Any new development will have to include parking in line with updated parking standards</p>	<p>No change</p>
<p><b>Existing parking improved</b> - In Need off street parking for existing homes before new development begins as cars are getting hit as vehicle are turning in and out off junction.</p>	<p>The parking standards aim to provide primarily off-street parking.</p>	<p>No change</p>
<p><b>Existing parking improved</b> - Parking issues are already a major problem throughout the Borough and we consider the proposed standards will increase congestion through increased on-street parking. Research needs to look at how people live and, with the decline in public transport, the increased dependency on the car.</p> <p>Although we support the principles of sustainability, there has to be a good public transport system. As it is unlikely that there will improvements, particularly with the bus services declining, we would like to see higher parking standards in residential areas and on sites near or involving town centre development. Not only will low standards result in more parking in</p>	<p>The standards have been revised since the Regulation 18 consultation, however the standards are based on actual data about the average number of cars owned by different kinds of households - this is research that looks at how people live and their dependency (or otherwise) on cars. Adding additional parking for developments in town centre locations would be irresponsible - land in these areas is scarce already, and these areas are the places with the best public transport links, whether buses or trains.</p>	<p>No change</p>



<p>the surrounding residential streets, adversely affecting their environment but the vitality and viability of a centre may be adversely affected if there is inadequate parking provision.</p>		
<p><b>Frequency</b> - TAP1 and parking standards - On page 203 one criteria that you state should be considered is “Train frequency from nearest station (Mon – Sat daytime)”. Given the current service I would suggest that this should be amended to “Train frequency of direct trains to London terminal stations” would be a more appropriate consideration; as a commuter belt area this is the rationale for moving to the area (and hence demand for housing) that will drive the demand for housing.</p>	<p>A new category has been included called "connectivity of nearest train station". This give all the train stations in the borough a ranking from 1 - 3 according to the quality of service that they provide, which takes account of wider accessibility.</p>	<p>Accessibility criteria updated</p>
<p><b>Frequency</b> - The accessibility assessment table needs to be refashioned. Presumably the scores under Public Transport associated with bus frequencies, number of bus services and train frequency must be zero if the bus stop and train station were beyond 500m and 1600m respectively. The overall accessibility score should be the sum of as many components as there are modes of transport. In the case of bus transport the element should be multiplied by an accessibility factor depending on the nearness to the house to the boarding point and then by factors reflecting the frequency and number of accessible routes. The lowest sum of the accessibilities of the various modes would be least accessible. A redesigned table with the correct logical relationships between the parameters is offered</p>	<p>The accessibility criteria have been refined and updated.</p>	<p>Updated accessibility criteria for parking standards</p>

<p><b>Frequency</b> In determining accessibility for parking standards calculations, frequency of public transport services also needs to be taken into account as well as physical proximity to a bus stop or station.</p>	<p>The accessibility criteria have been refined and updated.</p>	<p>Updated accessibility criteria for parking standards</p>
<p><b>Front garden</b> - The need for more parking is causing people to pave over their front gardens likening our leafy streets to inner cities. This can be done sympathetically with appropriate materials and should require planning permission. Local bylaw to make it more difficult to turn gardens into parking spaces - a cause of flooding.</p>	<p>The point is noted, but the situations in which driveway pavings require planning permission are already laid out, and the Council adheres to these standards. Driveway paving with permeable material, which does not increase flood risk, does not require planning permission.</p>	<p>No change</p>
<p><b>Garage</b> - Residential standards - It is presumed that the parking spaces referred to below are off-street and include parking within a garage, is this the case?</p>	<p>This is correct, although garages will only be considered to count towards parking provision when they are over a certain size, as people are less likely to park cars in small garages.</p>	<p>No change</p>
<p><b>Garage</b> - When considering parking availability on new housing developments, care should be taken when counting a drive as one unit if it also serves a garage. Not only are many garages used for storage, but if access is required to the garage, the car in the drive will tend to be parked on the street.</p>	<p>It is unclear whether there is any data to support this claim. Many garages are used for storage, often because they are too small for cars - garages will only be counted as a parking space if they are over a certain size.</p>	<p>No change</p>
<p><b>Garages</b> - It is not clear why there are two size specifications for a garage. How should one decide which would be applicable?</p>		
<p><b>Gated developments</b> - I would object to further gated developments and would prefer to see the council come up with a serious parking strategy before continuing with development planning</p>	<p>Noted.</p>	<p>No change</p>

<p><b>Gatwick</b> holiday parking cracked down on.</p>	<p>Noted, and the DMP contains a policy to restrict airport parking in the borough. Any illegal or unsafe parking should be reported to the police or the parking authorities.</p>	<p>No change</p>
<p><b>Green Travel Plan</b> - We propose an addition to this policy requiring developments above a certain scale (to be defined – and would be different for workplace, retail, residential and community uses) to be required to provide a Green Travel Plan. The detailed requirements for this should be set out by a Supplementary Planning Guidance.</p>	<p>Developments that require a travel plan would be expected to demonstrate some 'green' aspects within it, in terms of reducing car use and encouraging sustainable methods of transport.</p>	<p>No change</p>
<p><b>Hospital parking</b> - Hospital parking charge are disgusting as private owned.</p>	<p>This is not something that the Council can control, it is up to the Hospital if and what they charge for their parking</p>	<p>No change</p>
<p><b>No parking standards</b> - I think that you need to remove the qualification. Adequate parking is essential to the success of these developments. The only alternative is essentially free, close to zero wait time public transport.</p>	<p>Assuming this refers to the clause in Objective SC6, which states that the need to encourage sustainable transport should be taken into account, this does not reduce the need to provide adequate parking, so there is no need to remove it.</p>	<p>No change</p>
<p>If one looks at the hopeless inadequacy of parking provision in the recent redevelopment of a care home into housing at the Lee Street end of Court Lodge Road, this point cannot be over-stressed! Cars park over-night entirely on the pavement, making it very dangerous for pedestrians at what is a nasty junction anyway, and also is very awkward for 100 buses.</p>	<p>Illegal or unsafe parking should be reported to the police.</p>	<p>No changes</p>

<p><b>Park and Ride</b> - Perhaps a park and ride shopping car park could be set up outside town?</p>	<p>The point is noted, but Redhill is quite a small town, with limited available land on its outskirts, so such a scheme would be difficult to set up.</p>	<p>No changes</p>
<p><b>Permits</b> - All new developments should have adequate parking but this should also go hand in hand with roadside parking restrictions. The amount of commuter parking on our roads is ridiculous hence the permit scheme being adopted in our road.</p>	<p>This is noted, but is not an issue for the DMP.</p>	<p>No changes</p>
<p><b>Public parking</b> - needs to be additional parking at reasonable prices</p>	<p>Noted.</p>	<p>No change</p>
<p><b>Public Parking</b> - Adequate parking is too vague, new developments might provide parking at home, but there is no expansion of parking in public areas to accommodate the new occupants .As future residential development brings increased traffic and commuters into the town, provision must be made to provide for reasonable priced adequate parking in the town. By removing a lot of parking capacity in town, this will put more pressure on the streets close to the town centre. Not a good thing for the quality of life. Cannot imagine how you will find adequate parking in town, as several new developments have already gone ahead without adequate provision Public parking in the town expanded - NOT BUILT ON! There should be more parking spaces in residential areas and on sites near or involving town centre development. Low standards result in more parking in the surrounding residential streets, and effect the vitality and viability of a centre if there is inadequate parking provision.</p>	<p>Noted. Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No change</p>
<p><b>Public parking</b> - I suggest making car park free to</p>	<p>The DMP does not deal with car parking charges.</p>	<p>No change</p>

<p>encourage footfall. More sensible parking is required and more reasonable prices. Red lines every where kills the high streets and charity shops every where make area look poor.</p>		
<p><b>Replacement spaces</b> - Policy required stating how parking spaces are to be provided to replace (on a 1 : 1 basis unless there are justifiable reasons for doing otherwise) spaces reduced wholly or in part by redevelopment</p>	<p>Noted. Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets</p>	<p>No change</p>
<p><b>Retail parking</b> - Yes as long as there are the car parking spaces available for the shopping areas but the shops are no good if there is not the car parking spaces. Shops want people to buy more and they need cars to carry their purchases. Otherwise people will be buying more online. Then shops will be shut and jobs lost. and people without computers (me for one) would be lost</p>	<p>The DMP non-residential parking standards aim to provide suitable amounts of parking for new shops and the DMP aims to provide adequate parking in town centre locations and elsewhere - however, it is also noted that town centres like Redhill are very accessible by public transport.</p>	<p>No change</p>
<p><b>Train stations</b> - train station parking should be taken into account for new development</p>	<p>Noted.</p>	<p>No change</p>
<p><b>Undercroft parking</b> - Is there scope to build underground parking at existing sites too?</p>	<p>The DMP does not really deal with existing sites, and adding underground parking to existing sites would be very expensive</p>	<p>No change</p>

<p><b>Undercroft parking</b> - Minimise the loss of land to parking by putting it underground where possible. We suggest that a policy be added to prioritise undercroft parking at all developments of 12 units and above. This could increase the density, as well as the liveability of new developments. It could also help facilitate the release of new sites for development. Underground parking may be expensive but France can do it so why cannot we</p>	<p>The point is noted, but undercroft parking is comparatively very expensive, and while it would be looked at favourably, it may in many cases affect viability.</p>	<p>No change</p>
<p>Will this ever really happen? This objective does not seem to happen. It needs to happen all over the borough, not just in new development pockets</p>	<p>Noted, although the DMP is not designed to rectify problems in existing developments.</p>	<p>No change</p>
<p>SC6 has mixed messages. Sustainable transport requires no increase in private vehicles. Adequate parking should be only for community vehicles.</p>	<p>The point is noted, however we must also reflect the reality that private vehicles exist, and can't just be willed away. Consequently, the aim is to provide adequate parking to avoid problems and conflict, while not providing such abundant parking that private car use is further encouraged.</p>	
<p>Better use of land more important than parking.</p>	<p>Noted, but providing space for parking is still necessary unless it is expected that there will be no additional cars in the borough in the coming years.</p>	<p>No change</p>
<p>The parking space stipulations seem not to be logically progressive and appear to be anomalous: 2 bed flat cf 3 bed flat 5+ bed flat cf 5+ bed house</p>	<p>It is not entirely clear what problem is being suggested here. The standards are based on data around the amount of cars owned by different kinds of household.</p>	<p>No change</p>

<p>The stipulated numbers in the accessibility table seem odd. How are fractional entitlements useful to a household?</p>	<p>Obviously a half-space cannot be used by a single household - the idea is that in developments of multiple units, the half spaces can be combined together to provide extra spaces in some houses, and fewer spaces in others, providing market choice for people with different needs.</p>	<p>No change</p>
<p><b>Huddleston Crescent:</b> Unify the 2 parking bays and extend them on both sides. This would add an extra 4 or 5 spaces. It would solve parking problems in the street and promote orderly parking. It is low-cost, can be quickly implemented and there is no significant impact on green/grass areas. Extend the existing parking bay on both sides in order to increase the number of spaces available. It would solve parking problems in the street and promote orderly parking. The green area behind the parking bay would not be affected.</p>	<p>The DMP does not deal with issues on existing sites, it is about the policies for future development in the borough.</p>	<p>No change</p>
<p>One of the major areas where we see how inconsiderate parking causes issues which the council has yet to address is Glenfield Road. Drivers are parking their cars end on at the top of the road and on the pavement which makes the road narrow and a hazard not only to drivers entering or leaving the road but to people using the pavements. Using the top of the road to turn round in has its problems. This will only increase if further development is approved. The proposal refers to not having an unacceptable impact on traffic, movement and parking which this would certainly do</p>	<p>The point is noted. Any development will need to demonstrate that it will not have an unacceptable impact on traffic and on-street parking.</p>	<p>No change</p>
<p>More car parking spaces could be created by cutting</p>	<p>Green spaces provide a benefit to the borough.</p>	<p>No change</p>

back on green spaces - for example, Taynton Drive, Sutton Gardens.		
Parking availability and disorderly parking are big issues in Merstham. The council should try new strategies and initiatives to solve the problem for current residents, especially now that new residential developments are being planned. The council should do something to promote orderly parking and provide more parking spaces where possible. For example, some existing parking bays in Merstham can be easily extended with no or minimum impact on green/grass areas and at a low cost for the council.	The point is noted, although altering existing parking spaces is not really part of what the DMP is designed to do.	No change
We need to prevent possible road traffic accidents where footpaths meet busy roads. Many cars mount the pavement at speed to park during school drop off times (Blackbrough Road is a prime example, a few metres before the intersection with Chart Lane). Bars need to be placed at the edge of the pathway to prevent parking at these points. One day a child on a scooter will be injured or killed.	The point is noted, although the DMP is about future development, not altering existing developments. Illegal or dangerous driving should be reported to the police.	No change



<p>worrying reduction of space for moving traffic on the Borough's residential and major roads because of parked vehicles. I live in Redhill and have just witnessed a large lorry having to reverse 200 yards down Upper Bridge Road having met a delivery truck coming from the other end.</p> <p>In the last year the space for moving traffic on London Road leading out of Redhill (A25) has become significantly and dangerously reduced due to parked vehicles on apparently unrestricted stretches. A minor through road such as Linkfield Street (steep with limited sight lines) is becoming so choked with parking on both sides that drivers in both directions are left to negotiate a narrow path through the centre of the road. Frustration and potentially life-threatening accidents are a daily feature of travelling this and many other of our roads.</p> <p>Worse is the plight of pedestrians. I have joined others on several occasions who have been forced to walk in the road because of parked cars obstructing pavements. Those with infants in pushchairs (like myself and my grandson) or carrying shopping have no choice but to use the road.</p> <p>Great projects and eye-catching developments are a fine thing but the quality of daily life on our streets has been seriously eroded over the years. It requires the urgent and imaginative attention of those charged with the development of our Borough.</p>	<p>The point is noted, and the DMP aims to provide as much parking as possible off-street, to reduce congestion. Illegal or dangerous parking should be reported to the police.</p>	<p>No change</p>
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<p><b>Disabled spaces</b> - Please provide more handicapped parking spaces near shops etc.</p>	<p>Noted, and a section on disabled parking has been added to the parking standards.</p>	<p>Disabled parking requirements added to parking standards.</p>
<p>We support the general principle of Proposed Policy TAP1, however we object to the proposed parking standards included at Annex 4 as referred at item c) of the proposed policy.</p> <p>We have reviewed the proposed minimum residential parking standards set out in Annex 4. These state that they have been “updated to reflect the local context of Reigate &amp; Banstead Borough”, however even for “High Accessibility” areas they are still suggesting a minimum parking standard of 1 space per unit which we believe is onerous particular for town centre locations. This is considered contrary to the aims to encourage the use of sustainable transport, particularly in the case of the First Point site which is an extremely accessible and sustainable location.</p> <p>In setting out minimum parking standards, RBBC’s approach regarding residential car parking in the DMP lacks flexibility and does not sufficiently take into account the need to encourage alternative travel options. Surry County Council (SCC) and national guidance provides more flexibility in their parking guidance. For example, SCC’s parking standards are set as “maximums” to provide some flexibility. SCC also state that:</p> <p>“The County of Surrey exhibits a wide range of social and economic circumstances that necessitate a flexible approach to identifying appropriate levels</p>	<p>A note has been added to the parking standards to make clear that lower levels of parking may be required in town centre locations, in recognition of their very high levels of accessibility.</p>	<p>"Research shows that there are different car use characteristics in the Redhill East and Redhill West Wards. Consequently, a lower amount of parking may be required in these wards and in areas within or close to town centres" added to parking standards</p>

of car parking provision. Such an approach should provide a level of accessibility by private car that is consistent with the overall balance of the transport system at the local level.”

Framework paragraph 30 and paragraph 39. Notwithstanding that above, there are numerous sections within the DMP document that contradict the planning approach to residential parking standards. Several examples are provided below. Objective SC1 of the DMP is “To ensure that new development makes the best use of land whilst also being well designed and protecting and enhancing local character and distinctiveness”. Providing parking at the levels set out in Annex 4 is likely to impact on the level of residential development that can be provided on site and features designed to protect and enhance local character/distinctiveness (i.e. the public realm improvements proposed on the corner of the First Point site).

Objective SC6 of the DMP is to “Require new developments to provide adequate parking, whilst recognising the need to encourage sustainable transport choices, particularly in the most accessible locations”. Insisting on implementing the proposed minimum residential parking standards at highly accessible sites will not comply with the aims of this objective.

In addition the DMP makes reference to paragraph 39 of the Framework, which we have set out above. The DMP also makes reference to Policy CS17 the Core Strategy which states that “The Council will

<p>work with Surrey County Council, Highways England, rail and bus operators, neighbouring local authorities and developers to...Manage demand and reduce the need to travel... seeking to minimise parking provision in the most sustainable locations and secure adequate parking provision relative to patterns of car ownership elsewhere.” It is therefore evident that the current draft of the DMP lacks flexibility regarding parking standards at accessible locations, although we note that the DMP currently states the standards proposed are currently a guide and may be revised.</p>		
<p>Proposed Policy TAP1 – Access, parking and servicing We strongly advise that proposed policy TAP1 is amended to take account of the suggested amendments and comments highlighted in red below: 1) All types of development, across the borough, will be expected to: a) Provide safe and convenient access for all road users, in a way which would not: i. unnecessarily impede the free flow of traffic on the public highway, or compromise pedestrians or any other transport mode, including public transport and cycling Comment: Development can sometimes interfere unnecessarily with the free flow of traffic on the existing highway, e.g. during the construction phase where traffic management measures such as temporary traffic signals are required to facilitate</p>	<p>TAP1 - 1a)i and 1a)ii - Suggested wording added Comment noted</p>	<p>The suggested text has been added to Policy TAP1.</p>

<p>access by construction vehicles. The word 'unnecessarily' should therefore be added.</p> <p>ii. materially exacerbate traffic congestion on the existing highway network</p> <p>Comment: Development that involves an increase in dwellings or gross floor area may lead to an increase in vehicular movements, and hence could result in increased traffic congestion on the local highway network. However, the county council's transport development planning team would only object if it was considered that the increase in traffic would have a material or severe impact on the safety and operation of the adjoining public highway. The word 'materially' should therefore be added.</p> <p>iii. increase the risk of accidents or endanger the safety of road users including pedestrians, cyclists, and other vulnerable road users</p> <p>All of the above should include consideration of cumulative impacts of development in the locality.</p> <p>Comment: Although the cumulative impacts of development will be considered, it should be noted that the county council's transport development planning team will continue to assess each and every planning application on its own merits, taking into account site-specific considerations.</p>		
<p>2) For developments which are likely to generate significant amounts of movement, a Transport Assessment and a Travel Plan will be required.</p> <p>3) Provision of the following should be considered and are encouraged:</p>	<p>Suggested wording has been added to TAP1</p>	<p>The suggested text has been added to Policy TAP1.</p>

<p>a) Infrastructure to support advances in vehicle technology, for example electric vehicle charging points or other ultra-low emission vehicles;  b) Shared use of private parking provision for public parking when not in use  c) Initiatives to increase travel by more sustainable options and help reduce the impact and frequency of travel by individual private car journeys (such as car pools/car clubs) to and from the development.</p>		
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SUSTAINABLE TRANSPORT		
<p><b>Banstead</b> - In Banstead the assumption that transport links are adequate is not true for a number of elderly residents.</p>	<p>It is not clear where in the document this assumption is made. The Borough Council do not control any of the public transport services, this is provided by a variety of operators including Surrey County Council, the Highways Agency, rail and bus operators, although the Borough Council do engage with these providers.</p> <p>Policies seek to address different levels of accessibility, for example the parking standards are based on three different levels of accessibility. This will require the applicant to assess their development using an assessment form. The form requires the applicant to include details about distance to facilities, frequency of public transport etc which will determine whether the development in an area of high, medium or low accessibility. Parking standards vary depending on what level of accessibility the site is in.</p>	<p>No change</p>

<p><b>Banstead</b> - There is little room on Banstead High Street for cyclists, and there is no room in Banstead to add cycle lanes to the roads.</p>	<p>The DMP is mainly concerned with new development, and requires that new development incorporates pedestrian and cycle routes within and through the site. Whilst large scale development can sometimes require improvements to the surrounding area to improve the accessibility of a development, this is on a case by case basis.</p> <p>New cycle routes on existing roads are otherwise the remit of Surrey County Council - see the following website for more information <a href="https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy">https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy</a></p>	No change
<p><b>Banstead</b> - The public transport and cycling facilities in Banstead are not adequate to support development in any form. Buses already find it difficult to drive down Banstead High Street.</p> <p>Banstead is not well served by public transport, leading to a reliance on cars.</p> <p>It is not true that Banstead has good transport connections apart from the A217 road. Buses are infrequent and take circuitous routes to pick up the maximum number of passengers. Banstead does not have a railway station with a frequent service to London and it does not have a car park associated with it; it is also a long walk from the centre.</p>	<p>The parking standards are based on three different levels of accessibility. This will require the applicant to assess their development using an assessment form. The form requires the applicant to include details about distance to facilities, frequency of public transport etc which will determine whether the development in an area of high, medium or low accessibility. Parking standards vary depending on what level of accessibility the site is in.</p> <p>The Reigate &amp; Banstead Core Strategy (adopted 2014) is Part 1 of our Local Plan and Policy CS17 in this document also covers Travel Options and Accessibility - in particular the policy states that the Borough Council will work with Surrey County Council, the Highways Agency, rail and bus operators, neighbouring local authorities and developers to: "secure provision of - or easy access to - services, facilities and public transport as part of new development". to improve the efficiency of the transport network and facilitate sustainable transport choices. However, as the Borough Council are not responsible for any of the public transport services they have limited capacity to control delivery of these.</p> <p>The Community Infrastructure Levy, which is a fixed tax on the</p>	No change

	<p>developer which is required on any additional floorspace which is created, can also be used on public transport. Where there are larger scale development then the developers may have to contribute to an enhanced public transport service if this is required to make the development acceptable.</p> <p>The cumulative impact of all the proposed DMP sites on the road network has been modelled by Surrey County Council which shows that should all of the developments come forward then the road network could accomodate this, although some mitigation may be required in some areas. Where mitigation is required due to a proposed development then the developer would be expected to fund the improvement.</p> <p>Surrey County Council, as the Highway Authority, are continuously working on improvements to the highway network as well to tackle current issues.</p>	
<p><b>Banstead</b> - The Banstead Station is underutilised - if expanded it would make a good park and ride for Sutton/London taking traffic off A217.</p>	<p>Comment is noted.</p>	
<p><b>Banstead</b> - Could make Banstead High Street traffic free during shopping hours, to benefit pedestrians and cyclists - car parking can be diverted to a new three storey car park on the current library site.</p>	<p>This is not within the remit of the Development Management Plan - Surrey County Council manage the road networks.</p>	



<p><b>Banstead</b> - More regular bus service needed from Banstead, particularly to Epsom and on Sundays.</p>	<p>The Borough Council do not control any of the public transport services and the buses are largely run by Surrey County Council - see here for further information <a href="https://www.surreycc.gov.uk/roads-and-transport/buses-and-trains/information-about-your-local-bus-services">https://www.surreycc.gov.uk/roads-and-transport/buses-and-trains/information-about-your-local-bus-services</a></p> <p>However, the Community Infrastructure Levy can be used to support better public transport</p>	
<p><b>Horley</b> - Horley is flat, so every new development there should have dedicated cycle paths, and the council should provide dedicated cycle paths from the estates to the centre and the station.</p> <p>More cycle lanes on roads, and more cycle routes into and from Horley are needed.</p> <p>I would like to see increased footpaths and cycle paths opened up around Horley. If you take the footpath parallel to Balcombe Road heading south for example, through fields, eventually you end up at a barricade, where I assume it was blocked off due to the motorway.</p>	<p>The policies in the DMP require the following:</p> <p>Policy TAP1 - all types of development across the borough will be expected to provide safe access for pedestrians and cyclists and incorporate pedestrian and cycle routes within and through the site.</p> <p>Policy NHE4 - e) Where possible, create new links and corridors between open spaces, green infrastructure and the countryside beyond, such as through the provision of footpaths and bicycle paths or through planting and landscaping.</p> <p>The DMP requires that new development incorporates pedestrian and cycle routes within and through the site. Whilst large scale development can sometimes require improvements to the surrounding area to improve the accessibility of a development, this is on a case by case basis.</p> <p>New cycle routes on existing roads are otherwise the remit of Surrey County Council - see the following website for more information <a href="https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy">https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy</a></p>	<p>No change</p>

<p><b>Horley</b> - The local bus service is great, the rail service poor. It's difficult for any employee to get into Horley other than by road. Parking is a nightmare.</p>	<p>The rail service is not something that the Council can control but we do work with infrastructure providers. Existing parking is also not within the remit of planning policy but policy TAP1 requires new development to meet parking standards and not to remove any existing parking if this is still required.</p>	
<p><b>Reigate</b> - In Reigate, I really doubt people would readily use buses. It's 'posh' mainly. People use their Chelsea Tractors and good people choose a more considerable vehicle which helps congestion in Reigate's narrow roads.</p>	<p>According to the 2011 Census the bus is the 5th most popular method of commuter transportation out of 11 options for those living in Reigate, which is higher than bus use for commuting for the borough as a whole. In line with national policy, our policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as sustainable transport choices for those who rely on or choose to use these transport modes.</p>	
<p><b>Nork</b> - Provide buses down the Reigate Road to provide the school children with direct access to school instead of having to go into Epsom and out again ! Provide a bus direct to the Royal Marsden from Nork</p>	<p>The bus network is mainly controlled by Surrey County Council. Their local bus strategy is available here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf</a></p> <p>However, the Community Infrastructure Levy can be used to support better public transport</p>	
<p>introducing more traffic might increase accidents.</p>	<p>The cumulative impact of all the proposed DMP sites on the road network has been modelled by Surrey County Council which shows that should all of the developments come forward then the road network could accommodate this, although some mitigation may be required in some areas. Where mitigation is required due to a proposed development then the developer would be expected to fund the improvement. Surrey County Council, as the Highway Authority, are continuously working on improvements to the highway network as well to tackle current issues.</p>	

<p>No plans for public transport improvements between North and South of borough. i.e. between Banstead and Reigate.</p>	<p>The bus network is mainly controlled by Surrey County Council. Their local bus strategy is available here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf</a></p> <p>The 420 bus does link Banstead and Redhill/Reigate -  <a href="https://assets.goaheadbus.com/media/route_pdf/MAP_420460480_ROADSIDE_MAY_2014_RGB_for_web.pdf">https://assets.goaheadbus.com/media/route_pdf/MAP_420460480_ROADSIDE_MAY_2014_RGB_for_web.pdf</a></p> <p>However, the Community Infrastructure Levy can be used to support better public transport</p>	
<p>There should be greater emphasis on improved transportation and less on parking.</p> <p>Emphasis should be on pedestrians and cyclists - if necessary to the detriment of passage of vehicles and vehicle access</p> <p>Pedestrians and cyclists should be assumed to have priority and access designed accordingly. So improving sustainable transport, buses, cycling and walking routes has to be prioritised. There is no room for more parking, should discourage car use. Existing cycling/walking routes re poorly signed and maintained i suspect many dont know they exist. Local buses need promotion.</p>	<p>The National Planning Policy Framework, which sets out the Government's policies for the planning system, states that "the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel" and "plans should "protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people". It goes on to state that "developments should be located and designed where practical to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities" and] create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones".</p> <p>Planning Practice Guidance, which also provides Government guidance on the planning system, states "maximum parking standards can lead to poor quality development and congested streets, local planning authorities should seek to ensure parking provision is appropriate to the needs of the development and not reduced below a level that could be considered reasonable". The DMP policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as sustainable</p>	<p>No change</p>

<p>Increase permeability and walkability by opening up walkways - for example along railway routes - and maintaining existing ones, so that walking is preferable to getting a lift.</p> <p>Cars left parked along roads is undesirable. Encourage sustainable transport choices is key.</p> <p>Creation of more safe cycle paths, particularly off road paths for tourism and leisure - North Downs way for instance. Tackling the congested and dangerous weekend roads caused by posse's of cyclists riding across the road.</p> <p>We need better rail/ cycle links throughout the region or at least some kind of strategy.</p> <p>Make it easier on all new developments for cycling for commuting and leisure use</p>	<p>transport choices for those who rely on or choose to use these transport modes.</p> <p>The Reigate &amp; Banstead Core Strategy (adopted 2014) is Part 1 of our Local Plan and Policy CS17 in this document also covers Travel Options and Accessibility - in particular the policy states that the Borough Council (who don't run any transport services themselves) will work with Surrey County Council, the Highways Agency, rail and bus operators, neighbouring local authorities and developers to: "secure provision of - or easy access to - services, facilities and public transport as part of new development". to improve the efficiency of the transport network and facilitate sustainable transport choices.</p> <p>The DMP requires that new development incorporates pedestrian and cycle routes within and through the site (see policy TAP1 and NHE4). Whilst large scale development can sometimes require improvements to the surrounding area to improve the accessibility of a development, this is on a case by case basis.</p> <p>New cycle routes on existing roads are otherwise the remit of Surrey County Council - see the following website for more information <a href="https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy">https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy</a></p>	
<p>I don't consider skimping on parking, and the pointing to other modes of transport to be a viable strategy</p>	<p>The National Planning Policy Framework, which sets out the Government's policies for the planning system, states that "the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel" and "plans should "protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people".</p>	<p>No change</p>

	<p>Planning Practice Guidance, which is another forum for Government guidance on the planning system, states "maximum parking standards can lead to poor quality development and congested streets, local planning authorities should seek to ensure parking provision is appropriate to the needs of the development and not reduced below a level that could be considered reasonable".</p> <p>As such, our policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as sustainable transport choices for those who rely on or choose to use these transport modes.</p>	
<p>Although it is desirable to use public transport, this approach is unrealistic in areas where services are poor and getting worse.</p>	<p>The bus network is mainly controlled by Surrey County Council. Their local bus strategy is available here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0011/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf</a></p> <p>However, the Community Infrastructure Levy can be used to support better public transport</p> <p>In line with national policy, our policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as sustainable transport choices for those who rely on or choose to use these transport modes.</p>	
<p>Give thought to affordable transport as those in poverty cannot afford to travel.</p>	<p>The Borough Council do not control any of the public transport services, this is provided by a variety of operators including Surrey County Council, the Highways Agency, rail and bus operators and these service providers will set the prices.</p>	<p>No change</p>

<p>It is not your job to encourage sustainable transport choices.</p>	<p>The National Planning Policy Framework, which sets out the Government's policies for the planning system, states that "the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel" and "plans should "protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people".</p>	<p>No change</p>
<p>The DMP misses an opportunity to consider all land developments in the borough. Whilst the DMP focusses on policies to guide decision making on planning applications, land development opportunities for sustainable transport improvements are not given enough consideration. For instance, the DMP includes little about public highway development for pedestrian and cyclist provision. Such considerations should be essential before the approval of policies that will increase public highway usage. If sustainable transport was given appropriate consideration, the provision of private land for new pedestrian and cycle routes would be better identified.</p>	<p>The DMP requires all new development across the borough to "incorporate a highway design and layout that achieves a permeable highway layout, connecting with the existing highway network safely and includes safe access for pedestrians and cyclists" and to "incorporate pedestrian and cycle routes within and through the site, linking to the wider sustainable transport network, especially in and to the borough's town centres".</p> <p>Whilst large scale development can sometimes require improvements to the surrounding area to improve the accessibility of a development, this is on a case by case basis.</p> <p>There are however strategies from other departments in the Borough Council and other bodies such as Surrey County Council and Highways England for improvements to existing development and highway networks. For example, new cycle routes on existing roads are the remit of Surrey County Council. They have a Surrey cycling strategy - see the following website for more information <a href="https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy">https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy</a></p>	<p>No change</p>
<p>I just don't think cycling (like they do in Amsterdam) is going to be considered. BUILD A NEW TOWN- that can accommodate cycleways.</p>	<p>The National Planning Policy Framework, which sets out the Government's policies for the planning system, states that "the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel"</p>	<p>No change</p>

	<p>and "plans should "protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people".</p> <p>The DMP requires that new development incorporates pedestrian and cycle routes within and through the site (see policy TAP1 and NHE4). Whilst large scale development can sometimes require improvements to the surrounding area to improve the accessibility of a development, this is on a case by case basis.</p> <p>New cycle routes on existing roads are otherwise the remit of Surrey County Council - see the following website for more information <a href="https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy">https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies/surrey-cycling-strategy</a>.</p>	
<p>Have 'sensible' separated cycle paths and walking routes been identified through the new housing estates planned?</p>	<p>The Development Management Plan allocates site which are considered to be most suitable for the identified uses. It does not mean these sites will definitely come forward and the document does not seek to prescribe what development should look like. The diagrams included are only included for illustrative purposes only and do not represent the final design. Should an applicant submit a planning application for these sites, the final design is to be informed by the wider policies which are applicable to all new development, and in regard to cycle paths and walking routes, the following policies have been proposed:</p> <p><b>Policy TAP1</b> - all types of development across the borough will be expected to:</p> <p>b) incorporate a highway design and layout that achieves a permeable highway layout, connecting with the existing highway network safely and includes safe access for pedestrians and cyclists</p>	<p>No change</p>

	<p>d) Incorporate pedestrian and cycle routes within and through the site, linking to the wider sustainable transport network, especially in and to the borough's town centres</p> <p><b>Policy NHE4 - e)</b> Where possible, create new links and corridors between open spaces, green infrastructure and the countryside beyond, such as through the provision of footpaths and bicycle paths or through planting and landscaping.</p> <p>Some of the potential development sites also identify improvements to cycle paths as required to support development on the site</p>	
Cycle links on the top of the North Downs are suitable only for the few.	In line with national planning policy, our policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as supporting sustainable transport choices, such as buses, for those who rely on or choose to use these transport modes.	No change
<p>Stop using cycling lanes as traffic calming, it's dangerous. If you want to encourage cycling then do it properly or don't bother at all, little white lines for 3 metres on a road do not work.</p> <p>Try walking along the pavements with those ridiculous cycle lanes that no one uses.</p> <p>.</p>	<p>Proposed Policy TAP1 requires all new development to include safe access for cyclists and incorporate cycle routes within and through the site. However, it is not prescriptive about how cycle lanes should be provided as specific design should be considered a site by site basis and tailored to the new development. Surrey County Council are responsible for cycle provision on existing roads and they state that "The appropriateness of shared use pavements will therefore depend on local circumstances, for example the level of pedestrian usage, width available, and the safety record of the adjoining road. The drawbacks will need to be balanced against the potential benefits, and considered on a case-by-case basis for individual schemes" - see this link for further information:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0009/29979/Surrey-Cycling-Strategy.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0009/29979/Surrey-Cycling-Strategy.pdf</a></p>	No change



<p>INF1 - A number of TfL bus services run into Reigate and Banstead - TfL in principle welcomes policy support for seeking developer funding for bus service improvement. This would be particularly relevant in serving identified growth areas and/or larger individual developments, mitigating the impacts of additional demand for bus journeys on existing routes or new ones. TfL also welcomes policy support for developments to mitigate their impacts on the road network.</p>	<p>Comment is noted. The Council's regulation 123 list Community Infrastructure Levy can be used to support better public transport</p>	<p>No change</p>
<p>Take advantage of new residential/school developments to provide pedestrian and cycle routes completely separate from motorised transport.</p>	<p>Any planning application for new development should be informed by the wider policies which are applicable to all new development, and in regard to cycle paths and walking routes, the following policies have been proposed:</p> <p><b>Policy TAP1</b> - d) Incorporate pedestrian and cycle routes within and through the site, linking to the wider sustainable transport network, especially in and to the borough's town centres</p> <p><b>Policy NHE4</b> - e) Where possible, create new links and corridors between open spaces, green infrastructure and the countryside beyond, such as through the provision of footpaths and bicycle paths or through planting and landscaping.</p> <p>The Council will be preparing a supporting document to guide applicants on design of parking, layouts and access to new developments to complement the relevant policies. Whilst we cannot be overly prescriptive as design should be on a case by case basis, taking account of local circumstances, we will provide examples of best practice</p>	<p>Include best practice for walking/cycling routes in the Supplementary Planning Document on parking, layout and access</p>

<p>Transport: An improved bus service along the A25 corridor should be considered within the plan, as a route that could achieve improved commercial viability and encourage a modal shift, particularly to reduce congestion in peak hours. This could include an extension to the 100 service to Reigate.</p> <p>We note that the Surrey County Council infrastructure study showed a large deficit in funding to provide the necessary transport infrastructure, including public transport and highway capacity associated with the developments proposed.</p>	<p>The Reigate &amp; Banstead Core Strategy (adopted 2014) is Part 1 of our Local Plan and Policy CS17 in this document also covers Travel Options and Accessibility - in particular the policy states that the Borough Council (who don't run any transport services themselves) will work with Surrey County Council, the Highways Agency, rail and bus operators, neighbouring local authorities and developers to: "secure provision of - or easy access to - services, facilities and public transport as part of new development", to improve the efficiency of the transport network and facilitate sustainable transport choices.</p> <p>The Community Infrastructure Levy, which is a fixed tax on the developer which is required on any additional floorspace which is created, can also be used on public transport. Where there are larger scale development then the developers may have to contribute to an enhanced public transport service if this is required to make the development acceptable.</p> <p>The cumulative impact of all the proposed DMP sites on the road network has been modelled by Surrey County Council which shows that should all of the developments come forward then the road network could accommodate this, although some mitigation may be required in some areas. Where mitigation is required due to a proposed development then the developer would be expected to fund the improvement.</p> <p>Surrey County Council, as the Highway Authority, are continuously working on improvements to the highway network as well to tackle current issues.</p>	<p>No change</p>
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<p>Please don't use all the car parking for Offices/retail/residential units thinking the car parking issue is going to disappear! Reducing stock and increasing demand for spaces = even more shortage of on street parking. On street parking is ugly, dangerous and causes congestion. In Europe they build car parks into their buildings in lower floors or in basements - why can't we do the same here? These are new buildings planned so no excuse!! Not enough parking provided by the developers should mean no planning permission from R&amp;B - this is simple!</p> <p>The plan says itself: c) Include adequate car parking and cycle storage for residential and non-residential development in accordance with adopted local quantity and size standards (see Annex 4). Development should not have an unacceptable impact on on-street parking.</p> <p>However, I can't see any evidence in the plan of preventing this 'unacceptable impact'?! </p>	<p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets.</p> <p>It would not be reasonable to require all new development to include basement parking, this can be very expensive and can make developments unviable.</p> <p>All planning applications would be considered on a case by case basis taking account of the existing context and the proposed development, using the minimum parking standards as a starting point. Policy DES1 also requires that new development "Makes adequate provision for access, parking, servicing, circulation and turning space, and parking, taking account of the impact on local character and residential amenity, including the visual impact of parked vehicles" If a planning application does not deliver good design or adequate parking then it will not be permitted.</p>	<p>No change</p>
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<p>Current rail provision is not able to cope with current demand, let alone demand increased by an additional 6900 homes. The current plan to build 6900 new homes in the area will clearly significantly increase the population. As this happens it will inevitably increase demand for travel from those who live, work and visit. Council time should be spent helping ensure an adequate service for the existing population first.</p> <p>Under the “National Planning Policy Framework” you are required to consider “the availability of and opportunities for public transport”. I cannot see how any planner could look at the current “availability and opportunities” and conclude that new housing / increased population is</p>	<p>The cumulative impact of all the proposed DMP sites on the road network has been modelled by Surrey County Council which shows that should all of the developments come forward then the road network could accomodate this, although some mitigation may be required in some areas. Where mitigation is required due to a proposed development then the developer would be expected to fund the improvement. Surrey County Council, as the Highway Authority, are continously working on improvements to the highway network as well to tackle current issues.</p> <p>In addition, any development on these sites will still be subject to a planning application, which will need to demonstrate that for transport (in line with national planning policy) the residual cumulative impacts are not severe and will not impact on the safety of pedestrians. In addition, although we can only put sites into the DMP which are available for development, this does not mean that they will all come forward for development as the Council does not control the vast majority of sites, and landowners may choose not to bring a site forward for development.</p> <p>The NPPF referes to the need to take account of "the availability of and</p>	<p>No change</p>
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appropriate. This would render your strategy essentially unachievable.

I can see no evidence that the council is discharging its responsibilities under policy CS17 – something which is critical for this plan to succeed. Under Policy CS17 you state you will work with rail operators to “Manage demand and reduce the need to travel by...securing provision of - or easy access to - services, facilities and public transport as part of new development” and also work to deliver “[improved] travel options through enhanced provision for bus, rail, walking”. This is clearly not happening and hence, as per the above, would presumably prevent new housing from being approved.

opportunities for public transport" with regard to setting parking standards, which the proposed parking standards do take account of. The parking standards are based on three different levels of accessibility. This will require the applicant to assess their development using an assessment form. The form requires the applicant to include details about distance to facilities, frequency of public transport etc which will determine whether the development in an area of high, medium or low accessibility. Parking standards vary depending on what level of accessibility the site is in, requiring higher parking provision in areas of medium or low accessibility but still recognising there will be demand for parking spaces in higher accessibility areas.

Reigate & Banstead do engage with service providers - however, as the Borough Council do not control any of the public transport services they have limited ability to change these. Planning policies need to be flexible enough to react to future scenarios and it is felt that the proposed policies do this by putting the onus on the developer to prove that the proposed development will be sustainable at the point in time that the planning application comes forward.

The proposed DMP requires that new development incorporates pedestrian and cycle routes within and through the site as follows:

Policy TAP1 - all types of development across the borough will be expected to:

- b) incorporate a highway design and layout that achieves a permeable highway layout, connecting with the existing highway network safely and includes safe access for pedestrians and cyclists
- d) Incorporate pedestrian and cycle routes within and through the site, linking to the wider sustainable transport network, especially in and to the borough's town centres

Policy NHE4 - e) Where possible, create new links and corridors between open spaces, green infrastructure and the countryside beyond, such as through the provision of footpaths and bicycle paths or through planting and landscaping.

In addition, large scale development can sometimes require improvements to the surrounding area to improve the accessibility of a development which must be funded by the developer.

The Infrastructure Delivery Plan provides further detail on the infrastructure. The Community Infrastructure Levy can also be used to fund public transport

<p>Pedestrians yes, cyclists no. The support given to cyclists by local councils has resulted in local roads being taken over at weekends. Its' all the more disappointing as so little seems to be done to encourage walking. Councillors should deal with the world as it is, not what they want it to be and the world relies on a car to travel longer distances. For shorter journeys walking, healthier, cheaper and safer than cycling, should be encouraged.</p>	<p>The National Planning Policy Framework states that "the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel" and "plans should "protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people". It goes on to state that "developments should be located and designed where practical to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities".</p> <p>As such, our policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as sustainable transport choices for those who rely on or choose to use these transport modes, including cycle movements as per national policy.</p> <p>As such, the following policies have been proposed in the DMP which would require any planning application for new development to have regard to cycling AND walking routes:</p> <p>Policy TAP1 - d) Incorporate <u>pedestrian</u> and cycle routes within and through the site, linking to the wider sustainable transport network, especially in and to the borough's town centres</p> <p>Policy NHE4 - e) Where possible, create new links and corridors between open spaces, green infrastructure and the countryside beyond, such as through the provision of <u>footpaths</u> and bicycle paths or through planting and landscaping.</p> <p>The Council will be preparing a supporting document to guide applicants on design of parking, layouts and access to new developments to complement the relevant policies. Whilst we cannot be overly prescriptive as design should be on a case by case basis,</p>	<p>No change</p>
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	taking account of local circumstances, we will provide examples of best practice	
TAP1 - GAL therefore supports the DMP Objectives SC6 & SC7 and broadly supports proposed policy TAP1.	Comment is noted	No change
<p>There is no provision in the DMP for the essential development of reliable and efficient public transport and until this happens the traffic and parking problems of the area will increase. There would need to be big improvements to public transport services as well as reducing cost to encourage more people to get out of their cars to achieve this.</p> <p>Also bus and train access must be considered at the planning stage, again to often this aspect is not thought through.</p>	<p>The Reigate &amp; Banstead Core Strategy (adopted 2014) is Part 1 of our Local Plan and Policy CS17 in this document also covers Travel Options and Accessibility - in particular the policy states that the Borough Council (who don't run any transport services themselves) will work with Surrey County Council, the Highways Agency, rail and bus operators, neighbouring local authorities and developers to: "secure provision of - or easy access to - services, facilities and public transport as part of new development", to improve the efficiency of the transport network and facilitate sustainable transport choices.</p>	No change



**TAP1** - We propose the following additions to policy TAP1:  
Safeguard strategic transport sites.  
We note that good practice is for transport networks (which in this case should include cycle and pedestrian networks and routes, bus routes, train routes, transport interchanges) to be designated clearly and for development to be planned strategically in ways that lead to more sustainable transport networks and routes, not frustrate future transport improvements. We therefore propose an additional policy 3)d)

'Initiatives to safeguard sites for strategic transport developments and interchange'. We consider that this should include at least:

- Bus station expansion in Redhill. This should enable and include plans to improve and extend the bus station, as was intended when **the current bus station was developed as a temporary 5-10 year improvement. This timescale would lead to the bus station site being improved in the current LDF process, but no details are included in the DMP; and**
- **Improved rail connectivity at Redhill/North Downs Line**

It would not be appropriate to include a policy on this but this is covered as per the below:

Bus station expansion in Redhill - The IDP addendum 2016 identifies the Redhill and Reigate Quality Bus Corridor for :  
Package focussed on increasing bus use and service reliability  
Improved passenger infrastructure and facilities

And ..

Package of sustainable and public transport measures, predominantly along the A23 corridor, linking Redhill, Horley and key rail stations, including better passenger/bus stop facilities and bus priority traffic measures at key junctions.

The Community Infrastructure Levy can also be used to fund public transport

Improved rail connectivity at Redhill/North Downs Line improvement - We have discussed this with Network Rail and they have confirmed the following that this site does not need to be safeguarded.

<p>improvement. Electrification and capacity enhancement of the North Downs Line is one of the top five strategic transport investments set out in strategic transport plans for the South East drawn up by Councils and four local enterprise partnerships (LEPs). This is reflected in item 7, Annex 2 of the Coast to Capital LEP strategic economic plan report to Reigate and Banstead Borough Council (Executive, 20 March 2014, Item 8) and the report Missing Links: How better South East transport links can improve UK economic potential? (South East England Councils, January 2016). The latter states (p17) that this would include a £40m – £60m flyover at Redhill. The location is not stated, but we assume it is the RED8 site identified in the DMP. Development at this location should not preclude this from going ahead.</p>		
<p>Sustainable transport links should be concentrated in those areas that require greater provision for public transport and meet the needs of residents who require it.</p> <p>Suggest looking at potential to expand the bus lane network to speed up buses through the borough without</p>	<p>Comment is noted. The bus network is mainly controlled by Surrey County Council. Their local bus strategy is available here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/00111/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/00111/29990/STP_Local_Bus_Strategy_Update-July_2014.pdf</a></p> <p>However, the Community Infrastructure Levy can be used to support better public transport</p>	

<p>impeding car travel times compared with current travelling times.</p>		
<p>There needs to be parking, but also integrated public transport. Nothing should be getting done that isn't well linked to public transport infrastructure. We need to minimise driving and encourage sustainable transport. Also safety for pedestrians and cyclists in road layouts etc. Lastly congestion should be modelled and mitigation out in place to reduce it.</p>	<p>The National Planning Policy Framework, which sets out the Government's policies for the planning system, states that "the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel" and "plans should "protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to ... give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; [and] create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones". "Planning Practice Guidance, which is another forum for Government guidance on the planning system, states "maximum parking standards can lead to poor quality development and congested streets, local planning authorities should seek to ensure parking provision is appropriate to the needs of the development and not reduced below a level that could be considered reasonable".</p> <p>As such, our policies seek to provide a balance between appropriate parking levels based on local evidence, research and thorough testing, as well as sustainable transport choices for those who rely on or choose to use these transport modes. In addition, the Reigate &amp; Banstead Core Strategy (adopted 2014) is Part 1 of our Local Plan and Policy CS17 in this document also covers Travel Options and Accessibility - in particular the policy states that the Borough Council (who don't run any transport services themselves) will work with Surrey County Council, the Highways Agency, rail and bus operators, neighbouring local authorities and developers to: "secure provision of - or easy access to - services, facilities and public transport as part of</p>	

	<p>new development", to improve the efficiency of the transport network and facilitate sustainable transport choices.</p> <p>The DMP requires all new development across the borough to "incorproate a highway design and layout that achieves a permeable highway layout, connecting with the existing highway network safely and includes safe access for pedestrians and cyclists" and to "incorporate pedestrian and cycle routes within and through the site, linking to the wider sustainable transport network, especially in and to the borough's town centres".</p> <p>The cumulative impact of all the proposed DMP sites on the road network has been modelled by Surrey County Council which shows that should all of the developments come forward then the road network could accomodate this, although some mitigation may be required in some areas. Where mitigation is required due to a proposed development then the developer would be expected to fund the improvement. Surrey County Council, as the Highway Authority, are continously working on improvements to the highway network as well to tackle current issues.</p>	
<p>The DMP has recognised the need for key centres to be a good environment for pedestrians. Creating more walkable urban centres will increase footfall, which is a key factor for regeneration and development. A modern sustainable urban centre requires development integrated with good pedestrian and cyclist routes, and efficient public transport. GAL welcomes the proposals which could serve well in facilitating unlocking</p>	<p>Comment is noted</p>	<p>No change</p>

development potential and inducing a more pedestrian friendly setting.		
This needs to be done in such a way that the speed of the motorist is not lower to the speed of the cyclists, and overtaking of cyclists is simple and stress free for the vehicle driver.	Surrey County Council are responsible for setting speed limits. See the link below for further information on these, including information on request for changes to speed limits: <a href="https://www.surreycc.gov.uk/roads-and-transport/road-safety/speed-limits">https://www.surreycc.gov.uk/roads-and-transport/road-safety/speed-limits</a> . In addition, the Borough Council will be preparing a supporting document to guide applicants on design of layouts and access to new developments to complement the relevant policies. Whilst we cannot be overly prescriptive as design should be on a case by case basis, taking account of local circumstances, we will provide examples of best practice including road widths.	Include best practice for road design in the Supplementary Planning Document on parking, layout and access
Life in Banstead now is bad for pedestrians - this needs to be addressed by 20 mile/hour speed limit, signs saying no u turns, no parking on/across pavements. and a central crossing would be beneficial.	Surrey County Council are responsible for highways including setting speed limits, signage and parking restrictions. See the link below for further information on these, including:  -information on request for changes to speed limits: <a href="https://www.surreycc.gov.uk/roads-and-transport/road-safety/speed-limits">https://www.surreycc.gov.uk/roads-and-transport/road-safety/speed-limits</a>  - information on requests for new signage <a href="https://www.surreycc.gov.uk/roads-and-transport/road-maintenance-and-cleaning/street-lights-traffic-signals-and-signs/non-illuminated-signs-and-bollards/requesting-or-enquiring-about-new-non-illuminated-signs-and-bollards">https://www.surreycc.gov.uk/roads-and-transport/road-maintenance-and-cleaning/street-lights-traffic-signals-and-signs/non-illuminated-signs-and-bollards/requesting-or-enquiring-about-new-non-illuminated-signs-and-bollards</a>  - information on parking control - <a href="https://www.surreycc.gov.uk/roads-and-transport/parking/parking-reviews">https://www.surreycc.gov.uk/roads-and-transport/parking/parking-reviews</a>	No change

I think the potential new sites included in the greenbelt regions of Redhill and Reigate are somewhat unrealistic in their assumptions over public transport provision.	Improvement of public transport are site allocation requirements which would have to be adhered to make the developments appropriate and permissible	No change
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FLOODING		
<p>Localised flooding occurs throughout the borough due to poor drainage - maybe concentrate on fixing this drainage issue rather than directing development schemes away from flood risk areas.</p>	<p>There are different sources of flood risk in Reigate &amp; Banstead Borough, including fluvial, as well as groundwater, flooding. The Development Management Plan is concerned with development and how this can worsen or improve this situation. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>However, outside of the impacts of new development, existing flooding is not within the remit of the Development Management Plan. Various stakeholders are involved in existing flooding management, and this is coordinated by Surrey County Council. More information can be found here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf</a></p>	<p>No change</p>

<p>On no account should development take place on land currently designated as flood plain or which has a history of flooding.</p>	<p>National planning policy guidance sets out circumstances when development can take place in flood zones but highlights that this must be appropriately mitigation - information on this can be found here: <a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change#sequential-approach">https://www.gov.uk/guidance/flood-risk-and-coastal-change#sequential-approach</a></p> <p>Policy CCF2 is in line with national policy and has informed by an up to date assessment of flooding in the borough</p>	<p>No change</p>
<p>If we reinstated the moors at Redhill we would reduce flooding in Nutfield.</p>	<p>This is a matter for a comprehensive strategy approach to flooding issues in the borough rather than the Development Management Plan. Various stakeholders are involved in existing flooding management, and largely coordinated by Surrey County Council with a lot of flooding improvements/mitigation schemes delivered by the Environment Agency. More information can be found here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf</a></p>	<p>No change</p>



<p>This is essential but has been ignored in the Horley where large numbers of houses are being built on the flood plains putting everyone at increased risk of flooding and why you are wishing to develop land in Horley that is on a flood plain and a low lying area.</p>	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3, in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>The Council has updated it's Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p>	<p>No change</p>
<p>If the Haroldslea Stream, Burstow Stream and the Two Mile Brook are improved it would reduce the flood risk in this area, but it would in turn increase the flood risk downstream, as it already causes flooding at Great Lake Farm, Lake Lane.</p>	<p>This is a matter for a comprehensive strategy approach to flooding issues in the borough rather than the Development Management Plan. Various stakeholders are involved in existing flooding management, and largely coordinated by Surrey County Council with a lot of flooding improvements/mitigation schemes delivered by the Environment Agency. More information can be found here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf</a></p>	<p>No change</p>
<p><b>Proposed change:</b> make specific reference to sewer flooding and an acceptance that flooding could occur away from the flood plain as a result of development where off site infrastructure is not in place ahead of development</p>	<p>Comment is noted. Reference to sewer flooding has been included in the infrastructure policy INF1</p>	<p>Reference to sewer flooding has been included in the infrastructure policy INF1</p>

<p>Who would object to this question? Why has it been included? This is a common sense comment, which should require no further discussion. Not hopeful of it being carried out when the decision to build on a flood plain is even being considered</p>	<p>Comment is noted. SC9 is an objective which will be delivered by CCF2 which is a policy which directs development away from flood areas and seeks to reduce existing flood impacts where possible through new development. Policy CCF2 is in line with national policy and has informed by an up to date assessment of flooding in the borough</p>	<p>No change</p>
<p><b>CCF 2</b> - We support this policy but would have expected some reference to advice from the Environment Agency on development in flood zones.</p>	<p>Comment is noted. Local planning authorities must take account of advice from the Environment Agency when developing the Local Plan policies on flooding (paragraph 100, National Planning Policy Framework). We have also consulted with the Environment Agency on these policies. Reference to the Environment Agency can be included</p>	<p>Reference to the Environment Agency has been included in the policy</p>
<p>CCF2 - Policy approach CCF2 requires at part 1(a) requires the exception test to be met "where necessary". The text at part 1(b) in effect requires the exception test to be met by adopting the same policy wording for the exception test in all cases. Part 1(b) should be reworded so that the text is consistent with paragraph 103 of the NPPF.</p>	<p>Comment is noted. Policy CCF2 has been updated to ensure consistency with the NPPF.</p>	<p>Comment is noted. Policy CCF2 has been updated to ensure consistency with the NPPF.</p>
<p><b>CCF2</b> - All sensible precautions, but most houses already lie outside areas that are prone to flooding. Flooding is most frequently encountered on highways and roads even within town centres. This is primarily a matter for Surrey County Council but the borough should have robust policies for recognizing these sites and liaising with the county to have them remedied without the need for public</p>	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p>	<p>No change</p>

<p>pressure. The acceptable frequencies for flooding events should be made public so that the public can decide whether action might be reasonably expected.</p>	<p>Outside of the impacts of new development, existing flooding is not within the remit of the Development Management Plan. Various stakeholders are involved in existing flooding management, and this is coordinated by Surrey County Council. More information can be found here: <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf</a></p>	
<p>this should follow the flood risk zone criteria set out in national planning policy and guidance and not be used to block new development where adequate flood risk mitigation measures can be incorporated on the development.</p>	<p>The National Planning Policy Framework (NPPF) requires that Local Plans 'should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk...' It does not preclude development that is necessary in areas of flood risk, as long as it can be made safe and does not increase the chance of flooding elsewhere (paragraph 100). Policy CCF2 in the Development Management Plan reflects this approach.</p>	No change
<p><b>Reigate</b> - there is usually No flooding around here we will deal with it if it ever happens.</p>	<p>Comment is noted. Policy CCF2 seeks to ensure that future development is directed away from areas at risk of significant flooding or places in which that development could cause flooding problems elsewhere across the whole of the borough.</p>	No change

<p>River levels continue to rise.... provision is made for now - not 10 years time</p>	<p>The Council have undertaken an updated Strategic Flood Risk Assessment which updates flood risk modelling. This takes account of climate change allowances in line with national policy. This will need to inform any relevant planning applications and where necessary they will need to do their own flood risk assessment which would also need to take account of future changes.</p>	<p>No change</p>
<p>The borough Strategic Flood Risk Assessments should be the primary source of flood risk information in considering whether particular areas may be appropriate for development. As pointed out National Planning Policy Practice Guidance paragraph: 064 Reference ID: 7-064-20140306, the area is in Flood Zone 2 or 3, or is in an area with critical drainage problems, advice on the scope of the flood risk assessment required should be sought from the Environment Agency. Where the area may be subject to other sources of flooding, it may be helpful to consult other bodies involved in flood risk management, as appropriate. In all cases where new development is proposed, the sequential approach to locating development in areas of lower flood risk should still be applied.</p>	<p>Policy CCF2 reflects the requirements set out in national policy. The emerging SFRA Level 1 and 2 will support planning applications and a revised sequential test will also form part of the evidence base for the next stage of consultation on the DMP, Regulation 19. The SFRA has been prepared in consultation with other bodies including the Environment Agency, SCC, Water bodies and other departments in the Council such as Development Management, drainage engineer and the emergency planning team.</p>	<p>No change</p>
<p>The Horley Town Plan/ Borough Local Plan envisaged a circle of public open spaces around Horley, both for recreational use and, more importantly, to ensure that the worst of the flood risk could be ameliorated, in part by managed flooding.</p>	<p>The Riverside Green chain supports this. Proposed site allocations NWH1 and NWH2 require that development is located outside the flood zones, enabling continuation of the Riverside Green chain.</p>	<p>No change</p>

SUDS do not work in Horley due to the high water table and the clay. The sewers cannot cope - the drains are overwhelmed and the River Mole backs up all the way from Reigate to Horley. The Fishers Farm and Bayhome Farm floodplain cannot get rid of water and remains a large lake for long periods. Water runs off the lake into the Railway Line - into residents properties and into Limes Avenue and Fishers.

Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3, in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding." If mitigation is necessary for a development, and SUDs are not suitable, then an alternative solution would be required. The requirement for consideration of sewers is included in Policy INF1 on infrastructure.

Outside of the impacts of new development, existing flooding is not within the remit of the Development Management Plan. Various stakeholders are involved in existing flooding management, and this is coordinated by Surrey County Council. More information can be found here:  
[https://www.surreycc.gov.uk/\\_\\_data/assets/pdf\\_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL\\_v2.pdf](https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf)

No change

<p>Absolutely essential! Far too much flooding in this area. Surface water management in the area is not fit for purpose.</p>	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>However, outside of the impacts of new development, existing flooding is not within the remit of the Development Management Plan. Various stakeholders are involved in existing flooding management, and this is coordinated by Surrey County Council. More information can be found here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf</a></p>	<p>No change</p>
<p>Builders should be responsible for flood risk insurance</p>	<p>Responsibility for flood risk insurance is not a matter for the Development Management Plan.</p>	<p>No change</p>
<p><b>CCF2</b> - Some Sustainable Urban Drainage Schemes (SUDS), depending on their design and location can attract birds in large numbers and have the potential to increase the birdstrike risk to the airport. Therefore we would be grateful if the following or similar could be added 'Respect aerodrome safeguarding requirements'.</p>	<p>Policy DES1 requires that development must respect aerodrome safeguarding requirements and that this includes blue/green infrastructure</p>	<p>No change</p>

<p><b>SC9</b> - "Direct" should be changed to refuse</p>	<p>The National Planning Policy Framework (NPPF) requires that Local Plans 'should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk...' It does not preclude some types of development in areas of flood risk under certain circumstances, as long as it can be made safe and does not increase the chance of flooding elsewhere (paragraph 100). Policy CCF2 in the Development Management Plan reflects this approach.</p>	<p>No change</p>
<p>By directing development away from risks of flooding you will be building on quality green belt land.</p>	<p>Draft DMP Policy CCF2 is designed to ensure that people and property are protected from the risk of flooding related to inappropriate or poorly mitigated development and is in line with the requirements of the National Planning Policy Framework (NPPF) at paragraphs 100 to 104. Flooding has been a particular problem in parts of the borough and climate change could continue to exacerbate this problem. Therefore, it would be out of line with national policy guidance, and irresponsible for the Local Plan to ignore the issue of flooding in the location of development. Further, some areas of the Green Belt are in areas identified as flood zones. Development in the Green Belt is restricted and, where the local planning authority must consider Green Belt land to meet identified needs in the plan, this is part of a careful process of land evaluation regarding meeting the defined purposes of the Green Belt, in particular to maintain openness and prevent towns merging.</p>	<p>No change</p>

<p>Current plans look to increase flood risk in the Redhill area by Nutfield road.</p>	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3, in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>The Council has updated it's Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p>	<p>No change</p>
<p>Concreting over green sites and deforestation will transfer flood risk elsewhere</p>	<p>Reigate &amp; Banstead Borough Council's policy is to use brownfield sites first wherever possible. However, Government policy requires that we maintain a 5 year housing supply and if we are unable to then we may need to release some areas of green belt.</p> <p>The Council has updating it's Strategic Flood Risk Assessment, which has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development. This policy sets out the need for management where it is necessary to build where flooding is a risk.</p>	<p>No change</p>



Unless the sequential test is demonstrated as being passed	This is what Policy CCF2 requires in line with national policy	No change
As a country we are building on flood plains - where in the water expected to go? how can people get adequate insurance?	Insurance is not a matter for the Development Management Plan; however, it is concerned with directing development to the areas of lowest flood risk and, where this is not possible, ensuring that measures are put in place to ensure that the development is safe and does not increase flood risk elsewhere (as required by the National Planning Policy Framework, paragraph 100), as is set out in this policy.	No change
We are concerned about the knock on effect of flooding in the wider area if HOR9, SEH4, NWH1 and NWH2 happen. Can the council provide guarantees that the flood water will be handled appropriately with minimal impact to property and livelihood?	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3, in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>The Council has updated it's Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p>	No change

<p><b>Redhill</b> - Redhill marsh, by definition, is a flood plain. Even now Redhill cannot cope with heavy downpours and water floods the underside of the rail bridge in the town centre. This has been exacerbated by people concreting their gardens (to permit off-road parking) so that there is nowhere but the road for water run-off to go. This needs to be addressed in any future planning. Cleaning out the roadside drains might help, at least a little.</p>	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3, in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>The Council has updated it's Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p> <p>However, outside of the impacts of new development, existing flooding is not within the remit of the Development Management Plan. Various stakeholders are involved in existing flooding management, and this is coordinated by Surrey County Council. More information can be found here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf</a></p>	<p>No change</p>
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<p>RBBC has not been seen to do this however! Local constituents know the areas that flood and have to deal with the consequences, i.e. Inholm's Farm/Haroldslea, Meath Green and Bakcolme Road have all seen flooding in recent years and as far back as 1968. Why build additional houses in these areas that will only add to the problem?</p>	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3 in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>The Council has updated it's Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p>	<p>No change</p>
<p>perhaps this will come in later stages but I saw and heard no mention of control measures should more building on flood plains be identified</p>	<p>Policy CCF2 requires that sites within flood zones 2 and 3, sites within flood zone 1 which are greater than 1 hectare in area, and sites with critical drainage problems or where a proposed development will result in a vulnerable development being subject to other sources of flooding will be required to complete a site-specific Flood Risk Assessment (appropriate to the scale of the development) and flood risk management plan. This should take account of the impacts of climate change over the lifetime of the development, demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users the proposed use and take account of the advice and recommendations set out in the Strategic Flood Risk Assessment. The applicant would have to demonstrate in their flood risk assessment what</p>	<p>No change</p>

	mitigation is suitable for the site, although Sustainable Drainage systems would be required to be considered.	
Point 3, how will this be monitored? The back gardens of Slipshatch Road flood now. Opposite is a 'Potential reserve urban extension site' How will anyone know if flooding in back gardens increases. How will it be rectified?	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3 in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>The Council has updated it's Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p> <p>Various stakeholders are involved in existing flooding management, and this is coordinated by Surrey County Council. More information can be found here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf</a></p>	No change

<p>Environment Agency supports the inclusion of Core Strategy objective SO10 and associated DMP objective SC9 in relation to overall ambition to reduce cause and consequences of flooding. The evidence base for policies should be more prescriptive over exactly what maps the Environment Agency have - in particular some reference to surface water map would be useful. Evidence base should also consider and reference the Flood Risk Management Plans (FRMP's)</p>	<p>A joint Strategic Flood Risk Assessment Level 1 (with Mole Valley and Tandridge District Council) has been commissioned which will incorporate the changes in national planning policy and new climate change allowances. A Reigate &amp; Banstead specific Level 2 SFRA has also been commissioned to support site allocations in the DMP.</p> <p>The SFRA is more specific over applicable mapping, includes reference to surface water maps and references Flood Risk Management Plans.</p>	<p>No change</p>
<p>The outcomes we want to see:</p> <ul style="list-style-type: none"> <li>• Policies and allocations within the emerging plan ensure no inappropriate development is located in areas at high risk of flooding</li> <li>• ensure development in areas at risk of flooding will be safe without increasing flood risk elsewhere</li> <li>• the plan contribute to reducing flood risk for existing communities</li> </ul> <p>The council should identify the risk of flooding from all sources through the Strategic Flood Risk Assessment (SFRA) and under the Duty to Cooperate work to manage and resolve any cross-boundary risk.</p>	<p>CCF2 refers to all those elements identified here, and the updated SFRA will identify risk from all sources. These have been consulted on as part of the Duty to Cooperate</p>	<p>No change</p>

<p>It will be essential that SUDS are properly planned at the onset of planning for new development. Developers and their design teams need to take into account different factors including the layout of the site, topography and geology when planning and positioning the different SUDS elements for the whole scheme. This information will be required for both outline and full applications so it is clearly demonstrated that the SUDS can be accommodated within the development that is proposed.</p>	<p>CCF2 also refers to SuDS and the Level 2 SFRA will also provide the necessary context at a site specific level. A SUDs SPD will be prepared following adoption of the DMP.</p>	<p>No change</p>
<p>Why are the council supporting development along the Burstow Brook/River Mole</p>	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3, in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>The Council has updated its Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p> <p>Site allocations require that no development is located within the flood zones and appropriate mitigation is included.</p>	<p>No change</p>

<p>This is a particular concern. Where I live (RH69EF) is at the centre of a large area which holds water safely during the rainy seasons. Even so, local residences - maisonettes on the Balcombe Road, and houses in Haroldslea Drive have in recent years been inundated. Other homes in Meadowcroft, Balcombe Road, Harlodslea Drive, Waltersville Way, and others, have been threatened and come close to being flooded. Common sense tells me that any development of land which holds water at any time of the year, must put pressure on surrounding areas and increase the risk of them being flooded.</p>	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3, in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>The Council has updated it's Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p>	<p>No change</p>
<p>Building on flood plains is just crazy, if any area has been flooded in the last 20 years even once, it should not be built on. Flood defences do not provide a long term solution</p>	<p>Comment is noted. Policy CCF2 of the Development Management Plan aims to steer development to locations outside of Flood Zone 2 and 3, in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."</p> <p>The Council has updated it's Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p>	<p>No change</p>

<p><b>CCf2 - (b)</b> The Council will need to explain how an applicant can ensure that the development will be “be safe for its lifetime”. Given that most existing dwellings in the UK are over 100 years old, how can an applicant predict what the flood risk will be 100 or 200 years hence? The applicant is already required to check with the Environment Agency on flood risk, and design a scheme with appropriate mitigation. This is then approved by the Planning Department who will check the flood risk assessment of the applicant. It is unclear what more the applicant can do. If the Council considers that a site is very vulnerable to flooding risk then it should not allocate the site. We do not know what the flood risk maps might look like in 200 years’ time. The policy is unjustified.</p> <p>(c) It is unclear what the Council is requiring here. The policy is too vague. It should be deleted because it does not provide the necessary clarity for the applicant or the decision-taker</p>	<p>The policy has been updated to make sure it is in line with national policy.</p> <p>National policy sets out what would be required to demonstrate that a development would be safe for its lifetime - this can be found here: <a href="https://www.gov.uk/guidance/flood-risk-and-coastal-change#sequential-approach">https://www.gov.uk/guidance/flood-risk-and-coastal-change#sequential-approach</a></p>	<p>Policy updated</p>
<p>And/or design to be able to cope with rare flood events with minimal damage.</p>	<p>Where development is outside the flood zones it would not be reasonable to expect this to be designed for flooding. Where development is proposed in flood zones and has demonstrated the appropriate tests that allow it to be built in the flood zones then it would need to include these details in the site specific flood risk assessment</p>	<p>No change</p>



<p>Horley, Meath Green and the Burstow Stream A number of sites in the vicinity of Horley and Meath Green are proposed and whilst these are not directly adjacent to Tandridge, TDC raise questions about mitigation and impacts upon the Burstow Stream. TDC recognise and support the joint working which is currently taking place between RBBC and TDC (as well as the Environment Agency and Surrey County Council in respect of flood in Smallfield) relating to the Burstow stream and flooding matters. The implications relating to development in these areas should be fully and properly understood before any formal allocation is made.</p>	<p>RBBC are supportive of the joint working with TDC and MVDC (and the EA and SCC). In addition, RBBC have commissioned a Level 2 SFRA for any sites within FZ2 or 3 or sites with 20% area of 1 in 1000-yr risk of surface water flooding - these include the Horley sites NWH1, NWH2 and HOR9. The SFRA Level 2 suggests mitigation for any potential impacts on the wider area.</p> <p>Furthermore, In line with national policy, Policy CCF2 requires that sites that are greater than 1ha in area will be required to complete a site-specific flood risk assessment which will be required to demonstrate surface water run-off impacts and how this will be managed and mitigated. This will be supported by the updated SFRA Level 1 that RBBC have commissioned alongside TDC and MVDC.</p>	No change
<p><b>CCF2</b> - The future flood risk in some areas will be affected by how development elsewhere in flood catchment areas, including upstream, affects current and future flood risk. This should be reflected in the policy. For example, it is noted that:</p> <ul style="list-style-type: none"> <li>• Current estimates of flood risk in Redhill do not appear to have modelled the impact of an end to dewatering and increased run-off associated with future completion of landfill operations off Cormongers Lane east of Redhill,</li> <li>• Flood risk in Redhill may also be impacted by the dewatering of the Mercers Farm mineral site east of Redhill. It is not clear if the impact of dewatering of this large and deep site via Glebe Lake into the Redhill Brook has been considered as part of flood</li> </ul>	<p>The Council has updated it's Strategic Flood Risk Assessment, and this has been used to sequentially inform site allocations, in line with national guidance to avoid flood risk at the site and also elsewhere as a result of the development.</p> <p>It would be for the landfill operators and mineral site operates to mitigate the impacts of their completion activities, they have a responsibility to ensure they do not impact on the neighbouring area. However, any site allocation within a flood zone or over 1 ha in area will be required to submit a site specific flood risk assessment which would need to take any surrounding context into account to ensure that the development would be appropriate in line with Policy</p>	No change

risk assessment for Redhill.

- The flood impacts of the Watercolour development, which is partially constructed in the flood plain were not accompanied by measures that the increased flood risk in this area.
- Development in the rural surrounds of Horley (under construction, with planning consent, and included in this DMP) may have an impact on the extent to which other sites flood.
- Potential future expansion of hardstanding at Gatwick area (either taxiways and other smaller scale improvements, and/or an additional runway) could impact on flooding of existing/proposed development sites.

These wider flood impacts should be considered as part of a wider strategic evidence base supporting the DMP. This should be reflected in the evidence base for Redhill, and the knock-on impact of development in the floodplain on other sites should be considered.

CCF2 of the Development Management Plan. This policy aims to steer development to locations outside of Flood Zone 2 and 3, in line with national policy. The policy also states that "proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding."

Should a second runway at Gatwick be proposed then it is acknowledged that the Local Plan would have to be reviewed.

Climate change

<p>CCF1 - no overall strategy of a practical kind; Where are the renewable energy solutions? How many wind turbines are there in the area? How many solar farms are there in the area? Fracking and deep oil drilling? How will the council encourage green energy solutions apart from more efficient buildings?</p>	<p>The DMP aims to encourage energy efficiency as much as possible within national policy constraints. However, on the issue of renewable energy, developing an overarching strategy or identifying possible sites for wind or solar farms is more difficult, due to the very constrained nature of much of the borough's rural land. Greenbelt land, or land within an Area of Outstanding Natural Beauty, is significantly harder to allocate for this kind of development, although it may be suitable in topographical terms. Consequently, it has been decided not to attempt this, and to leave the development of renewable energy in the borough to the private market. A policy has been included, however, to encourage consideration of on-site renewable energy generation on new developments in urban areas.</p>	<p>New Policy CCF1 added.</p>
<p>Renewable energy in new developments should be mandatory, with some of the energy being used to power street lights. Every single home should be carbon neutral, meet Passive Haus standards, provide energy back to the grid, and have water gathering/storing facilities.</p>	<p>With changes to national policy in a Written Ministerial Statement on 25th March 2015, it is now no longer possible for a local authority to insist that all homes be built to Passivhaus standards - with the exception of some small changes to water and energy efficiency standards, the Council can only demand that developers comply with the current Building Standards. There is some scope to demand renewable energy production be included in new developments through the so-called 'Merton Rule', and such a policy has now been included.</p>	<p>New Policy CCF1 added.</p>

<p>The plan should include a view on preferred locations for solar arrays; small-scale anaerobic digestion plants; wind turbines; combined heat and power plants utilising landfill gas (the current Redhill landfill generator does not capture and use heat - this is thought to be due to Network Rail not allowing a heat pipe to be installed under the railway, and revisiting this issue should be identified as an opportunity in the plan); and consider the use of wood fuel in new developments, as there is significant forested area which could be managed in ways that sustains biodiversity while providing fuel. This could be reflected in plans for rural land use in the Borough plan and provide energy generation opportunities for new and existing developments.</p>	<p>The DMP aims to encourage energy efficiency as much as possible within national policy constraints. However, on the issue of renewable energy, developing an overarching strategy or identifying possible sites for wind or solar farms is more difficult, due to the very constrained nature of much of the borough's rural land. Greenbelt land, or land within an Area of Outstanding Natural Beauty, is significantly harder to allocate for this kind of development, although it may be suitable in topographical terms. Consequently, it has been decided not to attempt this, and to leave the development of renewable energy in the borough to the private market. A policy has been included, however, to encourage consideration of on-site renewable energy generation on new developments in urban areas.</p>	<p>New Policy CCF1 added.</p>
<p>More should be done to build housing with solar panel system already in place.</p>	<p>Noted and agreed - the encouragement of microgeneration in all new developments is included in Policy DES1 and new policy CCF1.</p>	<p>New Policy CCF1 added.</p>
<p>Recent redevelopment in Redhill centre (e.g. Sainsbury's) has noticeably failed in this respect, by for instance not designing in any renewable energy provision at all. An opportunity lost.</p>	<p>Looking forward to future development, policy CCF1 will be updated to make it clear that renewable energy in new developments is encouraged.</p>	<p>New Policy CCF1 added.</p>

<p>The council should set strict minimum standards in respect of this and not allow themselves to be 'negotiated down' by developers. Solutions should be onsite wherever possible, not through off site 'offsetting' elsewhere in the borough although this should be pursued if all parties agree no other option</p>	<p>Policy CCF1 will be updated to discuss renewable energy provision in new developments. However, national policy, with its presumption in favour of sustainable development, limits the number of 'red lines' that can be drawn in local policy, and the process of negotiation between planners and developers is likely to continue. It is also believed that, when it comes to renewable energy issues, offsetting is a potentially acceptable solution - unlike with biodiversity features, renewable energy infrastructure is not particularly location-dependent.</p>	<p>New Policy CCF1 added.</p>
<p>If you really believed in tackling climate change and energy efficiency you would not be ripping up the green belt to developers to build at massive profit executive housing for people who are newcomers and will be commuting to London.</p>	<p>In terms of the five stated aims of the green belt in national policy, the ones most related to climate change issues are to restrict sprawl, and to encourage recycling of derelict and other urban land. However, national policy also insists that the borough must meet its objectively assessed need for housing during the plan period. Due to the relatively high levels of greenbelt land in the borough, these two policy aims unfortunately pose some contradictions. To deal with this, a 'phased' approach to land management during the plan period has been proposed. This means that the primary focus of development must be on previously developed land and sites in existing urban areas. Only after this land has been used as thoroughly as possible will greenbelt sites be released. At this point, the plan identifies the areas of greenbelt land that could</p>	<p>N/A</p>

	<p>be developed most sustainably, with the least amount of sprawl. Any new developments on greenbelt land would be expected to provide a mix of different types of housing, and a proportion of affordable housing.</p>	
<p>Encourage is weak... Insist would be better!</p>	<p>The DMP document must be in accordance with the National Planning Policy Framework (NPPF), which sets out government planning policy. The NPPF states that developers should comply with local policies on decentralised energy "unless it can be demonstrated by the applicant...that this is not feasible or viable" (paragraph 96). As such, a development would not be refused planning permission if a robust viability assessment was provided with the application that demonstrated that renewable energy or energy efficiency measures would be too expensive to install. Consequently, although these measures are strongly encouraged, we are not able to insist.</p>	N/A
<p>This is surely something that is being legislated for or has been legislated by Central Government/EU? Whilst every effort should be made, these efficiencies put up the prices of houses and don't necessarily allow owners to get their money back!</p>	<p>National legislation on flooding exists, and our responsibilities in this area are reflected in the DMP document. National legislation on climate change merely provides a nationwide target for carbon reduction of 80% on 1990 levels by 2050. It is the responsibility of each local authority to interpret how best to contribute to this nationwide goal. The Council believes that including expectations around energy efficiency and renewable energy in the development management document will</p>	N/A

	encourage early discussion between developers and planners and allow such measures to be included in new developments in ways that are efficient and affordable.	
The house builders should not just be encouraged to be green they should be obliged to make provision. After all they are getting a great deal as to be able to build on green belt will be very profitable for them.	Noted - however, national policy presently puts limits on what local planning policies can demand from housing developers in this area. Policy DES6 could be expanded slightly to reflect the limits of what national policy allows us to demand.	Relevant sections of DES6 moved to a climate change-specific policy CCF1, with additional details added.
<b>CCF1</b> - We do not accept that it is adequate to omit a policy on climate change and rely on the limited specific references climate elsewhere in the proposed set of DMP policies. We propose that the Council review best policy practice from other Councils and consult separately on this policy (alongside other policies not detailed at this stage) prior to the Regulation 19 consultation.	In light of consultation responses and further consideration by planning officers, it has been decided to include a more detailed policy relating to climate change mitigation in the Regulation 19 DMP document.	New Policy CCF1 added.
<b>CCF1</b> - This is worth expanding on to include national norms for thermal insulation in new development; norms for emissions from heating systems; community heating systems where appropriate to ensure greater thermal efficiency; alternative transport modes to limit car use; planting schemes for the absorption of carbon dioxide; development schemes to create greener healthy environments.	National norms for insulation and heating systems are covered by Building Standards, which all developments must follow. Alternative transport modes are covered by Policy TAP1. Planting and green spaces are covered in Policies NHE2, NHE3, and NHE4. Development schemes to create greener, healthier environments will be covered by a forthcoming Green Infrastructure Strategy that is aimed to be published and consulted on at	District heating has been included as an acceptable form of low carbon energy for the purposes of the new Policy CCF1(2).

	the same time as the Regulation 19 DMP document. A policy on community/district heating systems will be added to the DMP document.	
<b>Climate change</b> - Existing development should be optimised and reused as much as possible in the first instance. Too many buildings are torn down rather than refurbished or repaired. This construction creates negative impacts while it is happening and consumes resources that would be better used on other activities	This is generally agreed with, and the refurbishment and reuse of existing buildings would certainly be considered to be at the top of a hierarchy of effective land uses. Policy CCF1 now calls for sustainable construction methods to be used, which may include the re-use of buildings; and policy NHE5 also supports the re-use of existing buildings in the green belt.	New Policy CCF1 added, contains reference to sustainable construction methods.
The government subsidy for solar energy has been scrapped. Are you proposing the council will provide a suitable subsidy?	The Council unfortunately cannot commit to providing a replacement subsidy for solar energy.	N/A
Mole Valley requires BREEAM standards of developments. Why not in Reigate & Banstead?	Policy CS11 in our adopted Core Strategy does require BREEAM, it states that "Relevant non-residential development of new or replacement buildings, or extensions to existing structures: [to be constructed] to a minimum of BREEAM 'very good'."While the Code for Sustainable Homes has been abolished since our Core Strategy was adopted for residential buildings, we are still able to require BREEAM standards for non-residential buildings.	New Policy CCF1 added.



<p>Thames water supports the mains water consumption target of 110 litres per head per day as set out in the NPPG and this should be included in Policy CC1. Thames water have a water efficiency website: <a href="http://www.thameswater.co.uk/save-water/3786.htm">http://www.thameswater.co.uk/save-water/3786.htm</a>. [...] The policy/supporting text could make reference to this guidance. Proposed change: make specific reference in Policy to the mains water consumption target of 110 litres per head per day as set out in the NPPG.</p>	<p>This requirement was already included in the document under policy DES6(1)(g), but has now been moved to CCF1 .</p>	<p>Requirement moved from Policy DES6 (Delivering high quality homes) to Policy CCF1 (Climate change mitigation)</p>
<p><b>SC8</b> - This is a matter that should be dealt with under Building Regulations - planning has enough to do already.</p>	<p>The design of new housing is largely covered by Building Regulations, and local authorities have no power to require stronger standards in the majority of areas. However, in the areas of water efficiency and energy efficiency, national policy does still allow local authorities to require slightly stronger standards subject to evidence of need. As these standards are based on evidence of need, the planning policy process is the appropriate place to deal with these particular standards, as per national planning policy guidance. Renewable energy technology is not mandatory on new housing developments under Building Regulations, but the DMP document makes clear that we would like to encourage greater uptake of these technologies.</p>	<p>N/A</p>

<p><b>SC8</b> - We would recommend new developments to incorporate green roofs. Living roofs and walls can enhance biodiversity, reduce the risk of flooding (by absorbing rainfall), improve a building's thermal performance, thus reducing associated energy costs, help counter the Urban Heat Island Effect, support higher density more sustainable development and improve the appearance of the urban areas.</p>	<p>Noted and agreed - We cannot be so prescriptive as to require these items but Policy NHE2 requires a net gain in biodiversity where possible and the reasons section of policy NHE2 refers to green roofs and green walls and encourages their use where appropriate.</p>	<p>"green walls" added to reasons section of NHE2.</p>
<p>Policy context for CCF1-2 Para 94 second there is 16 in the text that does make sense</p>	<p>Noted and corrected.</p>	<p>Typo corrected.</p>
<p>Also need to recognise role green space has to play in resilience.</p>	<p>Noted and agreed. The use of green infrastructure as a method of flood control is hinted at in the justification for policy NHE4, but this could be made more explicit, and could also be referenced in the justification for policy NHE3 on the protection of trees.</p>	<p>"and for flood resilience" added to justification for NHE3; "and flood risk" added to justification for NHE4.</p>
<p>We propose deleting the word 'resilience' from the title to read 'Climate change and flooding'. Resilience is generally concerned primarily with adaptation to climate change, of which increased flood risk is one aspect due to the impact of climate change on rainfall patterns. However, action to address climate change should also mitigate its impacts through both higher standards for new development and retrofit measures to improve the sustainability of the existing built environment – as reflected in objective SC8 and wording following proposed policy approach CCF1.</p>	<p>Noted and agreed - the title of the section will be changed.</p>	<p>Section retitled 'climate change and flooding'</p>

If you must use the land south of Horley then put in a solar panel farm.	While a solar farm by itself is unlikely to be considered the best use of this land, Policy CCF1 should make it clear that options for on-site renewable energy generation will be encouraged in all development proposals.	New Policy CCF1 added.
I am against fracking as it's very dangerous and can cause sink holes as well as poison the water supplies.	The question of whether fracking should take place in the area is the responsibility of Surrey County Council.	N/A
These issues should only be addressed where feasible and affordable.	Proposals relating to climate change can in many cases be made feasible and affordable by including them as clear expectations in a development management document such as this one, and encouraging early discussion on such matters between developers and planners. Mitigation of flood risk is particularly cost-effective when considering the expense of dealing with the aftermath of flooding events. Proposals for standalone renewable energy generation would be likely to be brought forward by private developers, who would need to demonstrate that their proposals are feasible and affordable, as well as meeting all other planning requirements (see Policy NHE1(5)).	N/A
There should be no wind turbines developed in the borough.	A blanket ban cannot be placed on any particular form of development across the whole of the borough. However, any proposals for wind turbines will need to meet all normal planning requirements, including those of Policy NHE1(5), which states that turbines "will only be permitted where their impact (visual and noise) would not harm the landscape".	N/A

<p>There is no need for renewable energy, we have enough nuclear power for thousands of years.</p>	<p>There are no specific proposals in the DMP document for renewable energy installations in the borough, although Policy CCF1 does encourage the inclusion of renewable generation in new developments where appropriate. Nuclear power stations are the strategic responsibility of the UK government, and the Council believes it is prudent to support options for local and smaller-scale energy generation such as district heat networks within new developments to complement the government's strategic energy planning.</p>	<p>N/A</p>
<p>New developments will consume more energy than they save. It will save more energy to simply not develop anything.</p>	<p>The borough does not have the option of having no further development, the Government requires us to deliver 460 homes a year to meet our identified housing targets. National planning policy also requires us to identify uses such as employment, retail and infrastructure (such as schools and GPs) which is required. Consequently, policies should aim to save as much energy as possible in the development that does take place.</p>	<p>N/A</p>
<p>Any proposed development of Banstead would be an environmental catastrophe, as the town already has the highest traffic flow in the south of England.</p>	<p>It is unclear what justification there is for the claim that Banstead has the highest traffic flow in the entire south of England. The environmental impacts of increased traffic in Banstead (and elsewhere in the borough) will be taken into account for all development proposals.</p>	<p>N/A</p>

Don't believe in climate change.	Climate change is recognised by the majority of the scientific community, the United Nations, the European Union, the British government, and the adopted Reigate & Banstead Core Strategy. National planning policy requires that our Local Plans take account of climate change and potential future impacts due to climate change.	N/A
Should be aiming to be a green, carbon neutral borough.	While the Council aims to reduce its environmental impact as far as possible, there are a number of restrictions to becoming completely carbon neutral during the plan period. This includes the requirement to meet the housing needs of the borough, the likely increase in road traffic due to a growing population, national policy restrictions on the level of energy efficiency that can be demanded in new housing developments, and the constraints and difficulties of installing renewable energy on the greenbelt land that makes up much of the undeveloped land of the borough. Consequently, while the plan aims to be as ambitious as possible, aiming for complete carbon neutrality would likely be unrealistic.	N/A
Climate change is unlikely to require special measures.	EU and UK government policy requires us to take action to prepare for the possible effects of climate change. National planning policy states that "Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and	N/A

	changes to biodiversity and landscape."	
Anticipate the probable failure of national infrastructure projects (e.g. Hinkley Point) to deliver on-time (or at all), and plan for as much local self-sufficiency as possible in energy production and use.	The plan cannot reasonably make the assumption that national infrastructure projects will fall through, and would likely be rejected by a planning inspector if it did. Nonetheless, producing more local energy would be a laudable aim. The borough is, however, constrained in this regard by the large amount of greenbelt land it contains. Although this does not make it impossible to create large scale renewable energy installations in the borough, it does make it more difficult than in some other areas of the country. However, a requirement to consider micro-generation on new developments has been included in Policy CCF1, to maximise the amount of renewable energy that can be produced in the borough.	New policy CCF1 added.
Should encourage the highest standards of energy efficiency.	Noted and agreed - however, current national policy limits how much local authorities can demand from housing developers in this area. However, Policy DES6 can be expanded slightly to reflect the limits of what national policy allows.	Relevant sections of DES6 moved to a climate change-specific policy CCF1, with additional details added.
Sustainability principles should underpin all new developments (balanced approach to sustainability not just a focus on one issue such as energy).	The cumulative aim of the policies in the DMP draft is to encourage sustainable new developments. Beyond Policy CCF1, Policies DES1, DES5, NHE1, NHE2, NHE3, and NHE4 could be considered to highlight particular areas of environmental and social sustainability.	N/A

<p>I would like to see affordable housing and council owned housing built to be very energy efficient and cost next to nothing to heat.</p>	<p>The document cannot provide differential standards for public, private, and affordable housing - however, it encourages all housing developments to provide strong energy efficiency measures, as far as national policy currently allows. Policy DES6 could be slightly expanded to reflect the limits of what national policy allows local authorities to demand of housing developers.</p>	<p>Relevant sections of DES6 moved to a climate change-specific policy CCF1, with additional details added.</p>
<p>Such as District Heating - Although we should not be digging up the existing towns to install a District Heating system. This should apply to new developments, e.g. Horley north</p>	<p>Core Strategy Policy CS11, which discusses district heating networks, makes clear that this policy approach is intended to be applied first and foremost to new developments.</p>	<p>N/A</p>
<p>Climate change and pollution should be top priority.</p>	<p>These topics are treated as priorities by the Council, but the DMP is limited in the scope of what it can take forward in these areas - national planning policy is quite strongly focused on housing, and plans must contain policies around housing, employment, town centres, as well as environmental issues like flooding, pollution, and climate change.</p>	<p>N/A</p>
<p>Give grants to existing homeowners and business to protect the climate.</p>	<p>Such funding was provided by the UK government through the Green Deal programme. However, funding to this programme has now been stopped and have stopped providing any funding to Reigate &amp; Banstead Borough Council, making it significantly more difficult to provide money for these improvements.</p>	<p>N/A</p>

<p>The best way to limit climate change us to encourage town centre viability. This means less cars on the road, less green space developed on and less empty office space. Flooding risk will only be minimised if you stop concreting over green space! Provide the sort of shops that people want (through reduced business rates) and this will stop people driving to alternative shopping centres.</p>	<p>Noted and agreed - The DMP seeks to support town and local centre viability to deliver local provision, and where people have to move around to also support more sustainable modes of movement, such as public transport, cycling and walking. Business rates are not able to be dealt with through the Development Management Plan. The plan aims to see previously developed land and land in urban areas used for new developments first. Only if the council cannot demonstrate a five year supply of housing (as required by national policy) in these areas will greenbelt land be considered for housing.</p>	<p>N/A</p>
<p>As long as the measure again taken in moderation, i.e.. would hate to see massive wind farms popping up across Surrey landscape</p>	<p>National policy, the adopted Core Strategy and DMP seek to ensure a balance between economic, social and environmental considerations are achieved. For example, Policy NHE1 is clear that wind turbines would only be allowed if it could be shown that their visual or noise impact would not harm the landscape.</p>	<p>N/A</p>
<p>In view of global warming all new development must incorporate energy saving and efficiency measures</p>	<p>This is noted, and required to the furthest extent allowed by national policy in Policy CCF1.</p>	<p>New Policy CCF1 added.</p>
<p>We have to do all we can to be sustainable and limit the damage to our planet - for our children &amp; their children</p>	<p>Noted and agreed - the DMP aims to do as much as possible to limit the borough's environmental impact.</p>	<p>N/A</p>
<p>Where suitable and viable</p>	<p>Policy CCF1 notes that developments will not be expected to provide microgeneration if it can be proved not to be viable - however, this will need to be proved, rather than simply</p>	<p>New policy CCF1 added.</p>



	assumed.	
Vital. All new builds either business or residential, should produce their own energy and be as eco friendly as possible.	The requirement for new developments to provide microgeneration and to meet as tight as possible energy efficiency standards has been included in the rewritten policy CCF1.	New policy CCF1 added.
This should be a requirement, not just an advisory regulation.	National policy limits the extent to which environmental improvements can be requirements, in order to balance the need for sustainability with the need for new development. Policy CCF1 aims to provide as strong an impetus as possible for the inclusion of environmental measures in new developments.	N/A

#### LANDSCAPE, BIODIVERSITY AND GREEN INFRASTRUCTURE

<b>Ancient Woodland</b> - Ancient woodland areas should be made accessible to the public, and be under the supervision of the Woodland Trust.	Ancient woodlands can be publically accessible where they are on public land, and are protected in all cases. We cannot require that the Woodland Trust be responsible for these and there has been no indication made to us that the Woodland Trust would like the responsibility of managing these lands. If a planning application is submitted which includes Ancient Woodland, we will usually require a management plan for this woodland.	No change
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<p><b>Ancient Woodland</b> - The Ancient Woodland in Tadworth must be properly protected and safeguarded. In line with The Woodland Trust guidelines there should be a buffer zone which allows no further development in the vicinity of the Ancient Woodland and which provides for plants and animals to have free and open access to the Ancient Woodland via neighbouring gardens. The Woodland Trust should be encouraged to perform a full survey of plant and animal life in the area with particular attention to protected species such as badgers and bats.</p>	<p>Following Forestry Commission guidance, it is agreed that buffer zones can and should be required between ancient woodlands and new developments. The size of these buffer zones should be decided on a case-by-case basis, but should include semi-natural habitat rather than back gardens.</p>	<p>Policy has been updated so that protected trees (including ancient woodland) and hedgrows are considered separately. The policy also now includes details on buffer zones</p>
<p><b>Designation</b> - Like the current emerging local plans of other constituent Surrey Hills planning authorities, it is urged that the Surrey Hills AONB Management Plan be tied into this plan's AONB policies. The Surrey Hills Board is anxious there be a consistency of approach to the protection of the AONB across all the constituent Surrey Hills authorities . It is also probably best to separate out the AONB and AGLV aspects of the policy. In light of the above the following wording is suggested to Policy NHE1: 1) Within or adjacent to the Surrey Hills Area of Outstanding Natural Beauty great weight will be given to conserving its landscape and scenic beauty and development proposals will assessed against the Surrey Hills AONB Management Plan.</p> <p>2) Within the Area of Great Landscape Value the same principles as above for the Surrey Hills AONB will be applied to determining planning applications until the Surrey Hills AONB Boundary Review has</p>	<p>Noted and agreed.</p>	<p>Suggested wording largely accepted for NHE1(1) and new Policy NHE1(2).</p>

been carried out.		
<b>Designations</b> - Surrey Hills AONB should be completely protected from development.	National policy does not allow for a complete ban on development in AONBs, however it does state that great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.	No change
<b>Designations</b> - The landscape designations should ideally be reviewed as part of a wider assessment given the significant changes that have been made since they were original designated (land around Merstham in particular has been affected by the construction of the M23 and M25 which post-date specific landscape designations).	Landscape designations are likely to be reviewed if changes are made to the AONB as a result of the AONB boundary review by Natural England. It is unlikely that they will be reviewed before this time, as the AONB boundary review could potentially invalidate any work done.	No change
<b>Designations-</b> Please keep to your word about the AGLV. It's position adjoining Priory Park and linking to Reigate Heath via Littleton Lane makes it a key contributor to the town's Green Space. It is well used by walkers, riders and cyclists from within and outside the Borough and it is vital to preserve it for present and future generations.	Noted. Policy NHE1 covers AGLV	No change
<b>General</b> - Also to locally designated areas. Why is the message not getting through that we are destroying large areas of essential wildlife habitat? Are safeguards being made to limit the amount of hedgerows, mature trees, and the habitat of the wildlife being destroyed?	Locally designated areas such as Local Nature Reserves and the Area of Great Landscape Value are explicitly referred to in policies NHE1 and NHE2, as well as CS2 of the adopted Core Strategy. The policies require that these designated areas are protected. This is covered in Policy NHE2, NHE3 and NHE4	No change

<p><b>General</b> - By nationally and internationally designated areas I think you should mean SSSIs, AONBs, European SACs/SPAs and UN RAMSAR sites. You should not necessarily mean Green Belts where the policy objective is to preserve “openness” not landscape. While this has its own policy (SC12), correctly mentioning this essential purpose, this policy should not be taken to apply to it as well. (Whether to encroach onto the Green Belt is a separate issue where other considerations need to be taken into account)</p>	<p>This section of the DMP document does not make any reference to the greenbelt.</p>	<p>No change</p>
<p><b>General</b> - Green infrastructure is only as good as the protection that is given to the countryside and clean air as well as the protection of designated green belt and public amenity land.</p>	<p>It is agreed that these are some of the key elements of green infrastructure, and it is believed that they have been given the appropriate level of protection in the draft DMP document and the Green Infrastructure strategy</p>	<p>No change</p>
<p><b>General</b> - Green infrastructure: The plan should include provision of allotments, community supported agriculture and orchards. These should be encouraged, both in appropriate locations in the urban area to improve the quality of the lived environment, and in the immediate boundaries of urban areas.</p>	<p>Noted and agreed - allotments and other community food growing initiatives provide important opportunities to connect urban residents with the environment, as well as providing other social and educational benefits, and multiple biodiversity benefits.</p>	<p>New clause NHE4(1)[d] added as follows: provision of green/blue infra secured by Council: "Looking favourably on proposals that enhance, extend, or make new provision for allotments or community food growing opportunities"</p>

<p><b>General</b> - I have confidence that regulations regarding protected species are followed. However there are many non-endangered species who live their lives on land earmarked for development. I am unhappy that their habitat will disappear. It is one of the joys of living where we do that we can share the space with such a rich diversity of animals and birds.</p>	<p>Policy NHE2(4) states that all developments will be expected to aim for a net gain in biodiversity - this includes finding ways to allow animals and birds to continue co-existing with humans in the landscape.</p>	<p>No change</p>
<p><b>General</b> - I would love this to happen but when money is involved I have no faith that biodiversity will even be considered.</p>	<p>The policies in the draft DMP are intended to provide strong protections for biodiversity. For example, NHE2 requires all development to aim for a net gain in biodiversity and NHE3 requires suitable justification to be provided for loss of trees and where loss of trees is permitted this must be reprovided.</p>	<p>No change</p>
<p><b>General</b> - It's not clear that the borough has a policy on landscape and biodiversity, they should not rely on Developers.</p>	<p>Policy NHE1 relates to landscape protection, and Policies NHE2 and NHE3 relate to biodiversity. They set out the council's expectations for developers.</p>	<p>No change</p>
<p><b>General</b> - It's not just about flooding but also about wildlife habitat protection. Regardless of the 'weasel words' highlighting the need to protect the environment we keep on building over more and more habitat. Planting a tree and not cutting a verge do not mitigate against this.</p>	<p>The Government requires that we deliver a certain number of homes over our plan period (2012 - 2027) but our policies seek to create a balance between development and protection/enhancement of the natural environment and character of the existing areas. The policies in the adopted Core Strategy and the draft DMP require that designated areas including special areas of conservation, Sites of Nature Conservation Importance, Local Nature Reserves, ancient woodland, biodiversity opportunity areas are protected and enhanced where possible. The documents also provide a means to comprehensively include biodiversity in all new</p>	<p>No change</p>

	developments (for example proposed policy NHE2 expects development proposals to achieve a net gain in biodiversity)	
<b>General</b> - Maintaining and creating more parks.	An action plan on this topic will be included in the Green Infrastructure strategy that is intended to be published and consulted on at the same time as the Regulation 19 DMP draft.	No change
<b>General</b> - More waffle. These additions will cost the taxpayer millions. None of your plans provide the housing people in the area, those who desperately need homes, require your main objectives satisfy developers and people who currently live elsewhere in the UK	The planning policies have been designed to be flexible to enable appropriate viability discussion. The DMP sets out in other sections the strategy for providing the necessary housing to meet the Borough's needs. It is unclear how the policies are of benefit to people who do not live in Reigate & Banstead Borough.	No change
<b>General</b> - Need to retain open space to maintain and hopefully increase the amount of greenery.	The draft Development Management Plan (see in particular policies OSR1, OSR2, OSR3, NHE1, NHE2, NHE4 and the Urban Open Space review that accompanies it which aim to retain and enhance provision of open space.	No change

<p><b>General</b> - New development should seek to ensure the quantity of open space is sufficient to meet local needs and contribute, where possible, to the network of green infrastructure even if none exists in the locality, with particular emphasis on improving the linkages between identified sites, biodiversity and the overall greening of the urban environment. New development should seek opportunities to provide open space designed to anticipate future climate change</p>	<p>Existing policies in the draft DMP document are already appropriate to these aims, including OSR2, NHE4 and CCF</p>	<p>Following wording added to policy OSR2 "the design of new open spaces should seek opportunities to anticipate future climate change impacts (See CCF1 and CCF2)" and this wording added to the reasons section of OSR2 "Consideration should be given to the impacts of climate change and how open space can help to mitigate these impacts, for example by providing shade."</p>
<p><b>General</b> - OK in principle, subject to knowing exactly what is meant by a "green Infrastructure network". This should not however be used as an excuse to oppose the principle of new homes in the borough, which is an essential response to the wider national crisis of a lack of supply of affordable housing.</p>	<p>The national policy of a presumption in favour of sustainable development does not allow a policy like this to be used as an 'excuse' for refusing new homes. The DMP document proposes a number of sites for housing, and all planning applications in all locations across the borough will be assessed on the basis of national and local policy. More housing is needed in the area, and the methods for achieving this are laid out in the DMP document. A green infrastructure strategy will be provided at the next stage of consultation which will provide more information on green infrastructure.</p>	<p>No change</p>

<p><b>General</b> - Pollution is very noticeable, prevailing winds tend to blow towards Horley rather than away from it, so it is important to have plenty of green space to act as a buffer and filter to absorb it.</p>	<p>Noted - the policies currently in the DMP draft aim to maintain existing green spaces and provide new ones where necessary. This includes "retention of an appropriate strategic gap between Horley and Gatwick airport" (p.191 of the draft document).</p>	<p>No change</p>
<p><b>General</b> - So how does new development protect the landscape?</p>	<p>Landscape' and 'open countryside' are not synonymous. The landscape is a combination of natural and built environments, which has constantly changed throughout human history, and the idea that such a process of change can be arrested, and a landscape frozen in time at a particular moment, is unfeasible. The aim of the policies in the DMP are to ensure that the process of landscape change occurs sensitively and in a way that does not detract from the quality of life of residents.</p>	<p>No change</p>
<p><b>General</b> - TDC are not opposed to the approach taken to landscape protection in the draft document for consultation but we would like to raise 'landscape' as an matter which has potential for joint working in determining up to date landscape designations that replaces the AGLV which is a revoked designation following the abolition of Structure Plans. TDC and RBBC share many different landscapes, and indeed designations (Surrey Hills), and these make up extensive natural open spaces and green infrastructure networks that are an asset for the communities and visitors of both areas. For the benefit of the wider landscape and the current and future users of the countryside, TDC feel that this is</p>	<p>Noted and agreed - our Core Strategy stipulates in Policy CS2 that the Surrey Hills Area of Outstanding Natural Beauty (AONB) is a landscape of national importance and therefore will be provided with the highest level of protection. The same principles will be applied to protect the AGLV as an important buffer to the AONB and to protect views from and into the AONB, until such time as there has been a review of the AONB boundary by Natural England. As such, we will not reviewing the AGLV at this point in time in line with our Core Strategy but a reference will be inserted to the importance of cooperation and that discussions will be initiated once the review of the AONB boundary has been</p>	<p>Reasons section updated to read: "The opportunity to designate such areas will be taken as appropriate once the AONB boundary review (to be undertaken by Natural England) is complete should these be needed to protect high quality areas that fall outside any revised AONB boundary, in</p>



<p>an opportunity for the Duty to Cooperate to be utilised in considering if joint local landscape designations could be carried forward and supported through the planning process</p>	<p>completed.</p>	<p>cooperation with adjoining local authorities."</p>
<p><b>General</b> - The number of houses with large gardens that have been sold to developers and demolished mean that there are fewer natural habitats for our wildlife as well as flora and fauna.</p>	<p>Noted, and this is dealt with in Policy DES2, particularly clause (1)[d], and NHE2</p>	<p>No change</p>
<p><b>General</b> - There is too much greenfield land being taken for housing and business. We need land for growing food and for farm animals.</p>	<p>The vast majority of the borough is still protected greenbelt land (around 70%) and the current DMP draft proposes building on only a small amount of greenbelt land, and only if and when a five year housing supply cannot be demonstrated in existing urban areas. This will have a negligible impact on food production in the borough.</p>	<p>No change</p>
<p><b>General</b> - Urban watercourses often provide excellent opportunities to include biodiversity enhancements in a development. Land adjacent to watercourses is particularly valuable for wildlife and it is essential this is protected. Article 10 of the Habitats Directive also stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Such networks may also help wildlife adapt to climate change.</p>	<p>Noted. The concept of green infrastructure in Policy NHE4 should be expanded to include reference to 'blue-green infrastructure', emphasising the interrelated roles of water features and green spaces in encouraging the benefits expected from green infrastructure. This can also be expanded on in the forthcoming green infrastructure strategy, which is intended to be published and consulted on at the same time as the Regulation 19 DMP document.</p>	<p>"and water features" added to NHE4(2)[b]; some references to "green infrastructure" changed to "blue-green infrastructure" to emphasise importance of water features.</p>

<p><b>General</b> - Very important to protect the borough's green spaces/woodlands and not develop these areas.</p>	<p>The policies in the draft DMP document aim to protect the most valuable areas of landscape, biodiversity and open spaces, while still enabling the borough to meet its housing needs, which is a national policy priority.</p>	<p>No change</p>
<p><b>General</b> - We are concerned that a green infrastructure plan showing protected areas and green corridors/wedges together with action proposals is not included in the DMP. We request it be included in the revised DMP.</p>	<p>A more detailed green infrastructure strategy is intended to be published and consulted on at the same time as the Regulation 19 DMP consultation.</p>	<p>No change</p>
<p><b>General</b> - We need to protect landscape and biodiversity features everywhere and not just in currently recognised areas.</p>	<p>The proposed policies aim to do this. NHE1 states that development throughout the borough must respect the landscape character; while NHE2 states that development throughout the borough will be expected to retain and enhance biodiversity features and aim for a net gain in biodiversity.</p>	<p>No change</p>
<p><b>General</b> - What is the existing comprehensive green infrastructure in the borough?</p>	<p>It is the network of multi-functional green spaces, both natural and man-made, and both urban and rural, that the Borough contains, and which provides a number of social and environmental benefits to the Borough.</p>	<p>No change</p>
<p><b>NHE4</b> - Where it is reasonable, proportionate and directly relates to the site in question.</p>	<p>Developments will of course be expected to provide green infrastructure benefits proportionate to their size and impact. but biodiversity and landscape protection, and appropriate landscaping, are important enough to at least be considered in all developments.</p>	<p>No change</p>

<p><b>General</b> - Yes - but not at the cost of higher building density or higher priced housing!!</p>	<p>The cost of housing on the open market is not controlled by planning policy, nor can planning policies be made with regards to the cost of housing. Housing density will vary across the borough in a way that meets our housing need while respecting the existing character of the area.</p>	<p>No change</p>
<p><b>General</b> - Yes, if this means that developers should contribute financially to preserving an enhancing existing green belt and parks and woodland reserve areas.</p>	<p>Improvements to existing green spaces can be negotiated with developers as part of the planning permission process, or could possibly be paid for through the Community Infrastructure Levy which is a financial contribution required from the developer on most new developments. In addition, developers can be required to provide compensatory measures (which could include improvements to other green spaces in the borough) when a development has a negative impact upon green spaces in the location where it is built.</p>	<p>No change</p>
<p><b>General</b> - You can't just stick a bird box in the garden of a development and say that it is contributing the preservation of biodiversity, it needs to be much more than that.</p>	<p>The example of bird boxes is only an example. It will not be appropriate in some developments, and in other developments it may be one of many appropriate measures that are needed to preserve and enhance biodiversity. A reference to appropriate planting has been added, and it has been made clear that these are suggested examples and not an exhaustive list.</p> <p>Policy NHE4 also covers Green infrastructure, which looks at providing a wider network of green space to complement developments</p>	<p>"or other methods where appropriate" added for clarity</p>

<p><b>General</b> -New developments with hundreds of buildings shoe horned in to one space will never achieve these objectives</p>	<p>Compact developments make more efficient use of land, allowing more of the borough's green space to be preserved. However, the policies in the DMP are designed to ensure development and density is appropriate to the context of the area</p>	<p>No change</p>
<p><b>General</b> -This rather begs the question why you are proposing to build 500-700 new houses on Green Belt land. This objective also seems incompatible with the suggestion to build up to 310 new homes east of Redhill. This is open Greenbelt land constituting numerous well-established trees (along A25 going east). Is destroying these going to be an improvement?</p>	<p>The purposes of the greenbelt in national policy are the preservation of openness and prevention of sprawl rather than on either preserving a particular landscape characteristic or encouraging biodiversity.</p> <p>The Government requires that we deliver a certain number of homes over our plan period (2012 - 2027) but our policies seek to create a balance between development and protection/enhancement of the natural environment and character of the existing areas. The proposed sustainable urban extensions (SUEs) have been carefully chosen to help the borough meet its housing needs in a compact and efficient way that has the least impact on the purposes of the greenbelt. It is proposed that they will only be brought forward if and when the borough cannot demonstrate a five year housing supply in existing urban areas - if we do not have a plan to demonstrate that we can deliver housing need then developers have more ability to build where they like, which would potentially have a much greater impact on both the openness of the green belt and landscape and biodiversity outcomes. These SUEs, if they are brought forward, will be expected to fully comply with the proposed policies on</p>	<p>No change</p>

	<p>landscape protection, biodiversity, and the protection of trees and will have to demonstrate how they will achieve this through the normal planning application process.</p> <p>The policies in the adopted Core Strategy and the draft DMP require that designated areas including special areas of conservation, Sites of Nature Conservation Importance, Local Nature Reserves, ancient woodland, biodiversity opportunity areas are protected and enhanced where possible. The documents also provide a means to comprehensively include biodiversity in all new developments - for example proposed policy NHE2 expects development proposals to achieve a net gain in biodiversity and DES1 and NHE3 require trees are retained, or where loss is unavoidable they must be replaced.</p>	
<p><b>Horley</b> - There is a distinct lack of green and grassy spaces in Horley. There is the Gatwick Nature Reserve, but it is quite noisy as it runs along the motorway.</p>	<p>Noted. The draft DMP aims to encourage more accessible open and green space to be provided as part of new developments and to protect important open spaces.</p>	<p>No change</p>
<p><b>Maintenance</b> - I'm very pleased to see this given such prominence but who is going to look after it? Parks &amp; Countryside don't even come close to coping with what they've got now. Will there be more rangers? I don't think so</p>	<p>In the case of new developments, new green space may be adopted by the Council or will be managed by a management company, usually financed by a service charge on residents. Green spaces that are owned and run by the council are looked after by the Green Spaces team, who handle individual sites on a rotating basis, to ensure each one receives an adequate amount of maintenance. Policy OSR2 requires that a planning application include appropriate measures</p>	<p>No change</p>

	for on-going management and maintenance.	
<b>Maps</b> - Your maps of green spaces cheated, as much of the highlighted land was private green space, e.g. school playing fields or sports club areas. These are not generally public spaces. we need more public areas, more trees and a cleaner environment.	Green infrastructure provides multiple benefits, not all of which require public access to be realised - the green space maps thus aimed to highlight all the green space in the borough. However, the need for greater public access to green spaces is recognised in Policy NHE4, and the need to protect existing trees and provide additional ones where possible is recognised in Policy NHE3 and in an addition made to NHE2.	"appropriate planting" added to NHE2 reasons; A new NHE3(2) has been added dealing specifically with ancient woodlands, and noting that a buffer zone may be required between ancient woodlands and new developments.
<b>Merstham</b> - Merstham is rich in water landscapes - publicise, promote, and protect these.	Noted and agreed - the water landscapes in the Merstham area will be maintained for their contributions towards the landscape, green infrastructure, and biodiversity. Blue infrastructure referenced in policy NHE4	Add blue infrastructure to policy NHE4
More parks in Tadworth and Walton like Priory Park	The draft DMP aims to encourage more accessible open and green space to be provided as part of new developments. However, it is unlikely that every area of the borough will be able to accommodate a park of the size of Priory Park, due to resource constraints.	No change

<p><b>NHE 1</b> - We would like to see reference in a policy to new landscape designations. This option was included in the CS as a possibility and we would like to see the concept included as policy in the DMP. So we suggest</p> <p>6) 'Once the AONB boundary review has been complete, the Council will introduce local landscape designations to protect areas of high quality countryside which could be at risk. .'</p> <p>The reason is that there some attractive landscapes, for example between the Mole Valley boundary and the A217 south of Reigate, as well as areas covered by the current AGLV, which would benefit from additional protection.</p>	Noted and agreed.	Reasons section updated to read: "The opportunity to designate such areas will be taken as appropriate once the AONB boundary review (to be undertaken by Natural England) is complete should these be needed to protect high quality areas that fall outside any revised AONB boundary, in cooperation with adjoining local authorities."
<p><b>NHE1 - 3</b> Many of the emerging development sites in the borough have an urban / settlement edge relationship meaning that they will impact on their immediate countryside landscapes, which the above policies seek to protect. Therefore a balanced approach will need to be taken in the assessment of likely impact and our view is that, as presently worded, policies NHE 1-3 are very restrictive and could be used to restrict development on identified sites thereby reducing their efficiency. Difficult decisions need to be made with regard to the identification of development land in the borough and this will inevitably mean that sites with strong countryside relationships will come forward for</p>	The point is somewhat noted, but it is difficult to understand which parts of the policies you believe are inappropriate, as you have failed to identify any such areas. Large parts of the existing policies are based on an interpretation of national policy, and are therefore considered appropriate. Some elements of the policies have been changed in recognition of specific problems raised in other representations.	No change

<p>development. Development of such sites needs to occur effectively and efficiently so as to reduce the number of such sites that come forward. As a result we consider that policy NHE1-3 should be reviewed and a thorough assessment made of their practical implication on identified development sites.</p>		
<p><b>NHE1</b> - add 'Once the AONB boundary review has been completed, the Council will introduce local landscape designations to protect areas of high quality countryside which could be at risk.'</p>	<p>Noted and agreed.</p>	<p>Reasons section updated to read: "The opportunity to designate such areas will be taken as appropriate once the AONB boundary review (to be undertaken by Natural England) is complete should these be needed to protect high quality areas that fall outside any revised AONB boundary, in cooperation with adjoining local authorities."</p>



<p><b>NHE1</b> - Policy approach NHE1 at part 1 is not considered to be consistent with paragraphs 113 and 115 of the NPPF which provide a distinction between nationally and locally designated landscapes. The NPPF is clear that there is a hierarchy and that the protection afforded to landscapes should be commensurate with this. Therefore the AONB and AGLV cannot equally be afforded great weight, which should be reserved solely for National Parks and AONBs and therefore the AGLV should be given lesser weight.</p> <p>Part 4 should provide specifically for new buildings in line with paragraph 28 of the NPPF.</p>	<p>The Core Strategy Policy CS2 identifies that the AONB is a landscape of national importance and therefore will be provided with the highest level of protection. The same principles will be applied to protect the AGLV as an important buffer to the AONB and to protect views from and into the AONB, until such time as there has been a review of the AONB boundary by Natural England. However, the general point is noted, and the policy will be rewritten to clarify the issue.</p> <p>The Town and Country Planning Act 1990 states that the definition of development is "the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land". Para 28 of the NPPF refers to new development rather than specifically buildings and direct reference to buildings could restrict development such as car parks, which would be supported under bullet point 3 of the para 28 of the NPPF.</p>	<p>Policy NHE1(1) to better differentiate between AONB and AGLV policies.</p> <p>No change to part 4</p>
<p><b>NHE1</b> - relating to the AONB and AGLV is possibly too short and to the point. It confuses protecting the setting of the AGLV with the recognised protection given to views into and from AONBs. Such government support or any other known local plan policies do not give the same protection to the setting of AGLVs unfortunately. This is one aspect that sets AONBs apart from AGLVs.</p>	<p>The Core Strategy Policy CS2 identifies that the AONB is a landscape of national importance and therefore will be provided with the highest level of protection. The same principles will be applied to protect the AGLV as an important buffer to the AONB and to protect views from and into the AONB, until such time as there has been a review of the AONB boundary by Natural England. However, the general point is noted, and the policy will be rewritten to clarify the issue.</p>	<p>Policy NHE1(1) to better differentiate between AONB and AGLV policies.</p>

<p><b>NHE1</b> - These policies are sensible. Solar farms and wind turbines can have aesthetic appeal and should not be dismissed. There are difficult choices to be made with regard to energy generation. The visual effect that a development might have should be weighed against the polluting and adverse economic effect that another means of energy generation might have. These matters need to be taken into account.</p>	<p>Noted. Any planning application submitted will be considered on a site by site basis and will take these matters into account.</p>	<p>No change</p>
<p><b>NHE1</b> - Under point 5 it says that 'Proposals for renewable energy developments, in particular wind turbines and solar farms, will only be permitted where their impact (visual and noise) would not harm the landscaping or undermine the intrinsic character and beauty of the countryside'. Some solar and wind turbines developments, depending on their size and location can have an impact on airport operations. Solar developments have the potential to cause glint and glare and deflection to radar. Wind turbines have the potential to infringe the protected surfaces around the airport and also the rotating blades can cause interference with navigational aids. Gatwick Airport Ltd supports renewable energy, however we need to assess any proposals to ensure that they do not impact on airport operations, therefore we would ask that the following is added 'Respect Aerodrome Safeguarding Requirements'.</p>	<p>Noted and agreed.</p>	<p>"With respect given to aerodrome safeguarding requirements" added to DES1</p>

<p><b>NHE1</b> - We note that a preliminary review was carried out, funded by Surrey Hills AONB to inform landscape appraisal, and recommends where the AONB should be considered for extension. We note that this review recognises the Greensand Ridge Line as important from Burstow to Bletchingley. As this landscape feature is recognised, it should also be protected as a feature into Redhill, which includes the Hillsbrow site which is of similar landscape quality to that identified.</p> <p>Proposed policy NHE1 - We propose that item 3a) be extended to say 'landscape character and landscape feature(s) of the locality'.</p> <p>And we propose an addition: 3g) Ensure the protection of ancient and veteran trees.</p> <p>We propose the DMP includes links to the latest maps of AONB and Area of Great Landscape Value (AGLV) for the Borough.</p>	<p>On the specific points relating to NHE1 - it is agreed that landscape features should be referred to.</p> <p>There is no need for the proposed additional clause (3)[g], as this topic is covered by NHE3;</p> <p>With regard to the discussion of the AONB, all development proposals within or adjacent to the AONB will have to comply with policy NHE1, which states that great weight will be attached to the impact of the development on the AONB, and that developments should be in accordance with the AONB Management Plan. Consequently, it is not felt that specific protection is needed for the Greensand Ridge, although its importance is noted - it is believed that elements worthy of protection will be covered by the existing policy. It is worth noting that the review referred to does not suggest the Greensand Ridge in Reigate &amp; Banstead be considered for an extension of the AONB, and the AONB board did not raise any issues around this area in their own consultation response.</p> <p>The proposal map will include designated areas</p>	<p>"And landscape features" added to NHE1(3)[a].</p>
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<p><b>NHE1</b> - Wish to see an amendment made to subsection 4 of Policy NHE1 in order for it to provide greater clarity for uses within the leisure and tourism industry.</p> <p>Given the location of The Caravan Club’s Alderstead Heath site within the Area of Great Landscape Value, The Club wish to see the upgrading and enhancement of existing leisure and tourism uses included amongst the types of development mentioned within subsection 4 of Policy NHE1.</p> <p>The Club wishes to see an amendment made to Policy NHE1 so that the policy would be supportive of existing sites within Areas of Great Landscape Value and allow the potential diversification of accommodation related to existing leisure and tourism uses. Support through the Development Management Plan will ensure that The Club will have the flexibility and potential to adapt their site to accommodate a range of visitors, whilst continuing to appeal to members.</p>	<p>It is not believed that a change to the policy is necessary here. NHE1(1) already states that great weight will be given to the impact of a proposal within or adjacent to the AONB. This would apply to the Caravan Club, but would not explicitly restrict it from expanding, merely stating that any such expansion or upgrade would be balanced against the needs of the AONB.</p> <p>NHE1(4) refers to supporting the continuation of rural businesses, without mentioning any specific class of rural business by name. This would include the Caravan Club, as a rural business, and it is unnecessary to be any more specific.</p>	<p>No change</p>
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<p><b>NHE1</b> - With reference to the assessment criteria of this policy, this again fails to account for the redevelopment of brownfield and previously developed sites and should ensure that consideration is given the scale and form of any existing built form, with favourable consideration given to schemes which have a lesser visual impact on the local landscape and scenic beauty. This approach is supported by paragraph 11 of the NPPF</p> <p>Summary recommendation: Paragraph 3c in particular should be enhanced to read 'be of a design, siting and scale that is complementary to the surrounding landscape, taking into account the height, scale and massing of any existing built form which is proposed to be lost as part of the proposed development'.</p>	<p>Noted. When a planning application is assessed by the Development Management team they assess all elements of the application i.e. design, access, movement generated and will give appropriate weight to each component. If the design of the development is an improvement on the existing then this will be reflected in the weight that is given to it, so it is not felt it is necessary to include this when it is already covered in practice.</p>	<p>No change</p>
<p><b>NHE1</b> A visual break and preventing coalescence suggests maintaining the perception of leaving one place and arriving at another to retain the distinct identity of places. This will need careful consideration in relation to HOR9, following paragraph 113 of the NPPF which requires a criteria approach for proposals on landscape areas.</p>	<p>It is agreed that a strategic gap of some sort must be maintained between Horley and Gatwick Airport, as well as an appropriate transition between the proposed employment area and surrounding residential areas, and this is recognised in the section of the DMP document relating to HOR9 (see the fourth and fifth bullet points under 'What would be required to support development of this site should it be allocated?'). However, the NPPF paragraph in question requires criteria based policies only for <i>protected</i> landscape areas - the proposed HOR9 site is not a protected landscape area.</p>	<p>No change</p>

<p><b>NHE1</b> seeks to protect the Surrey Hills AONB and Areas of Great Landscape Value (AGLV) in the borough from development that would have a detrimental impact on its attractiveness as per Policy CS2 of the Core Strategy. However the policy fails to recognise that there is growing need for housing across the borough. In line with Paragraph 49 of the NPPF, suitable sites beyond the defined urban areas should be considered for release to ensure an adequate supply of housing land across the plan period and beyond. The policy should be amended to make clear that suitable land within the AGLV, particularly land adjacent to existing settlement boundaries, will be considered for release and use as housing land.</p>	<p>The Core Strategy Policy CS2 identifies that the AONB is a landscape of national importance and therefore will be provided with the highest level of protection. The same principles will be applied to protect the AGLV as an important buffer to the AONB and to protect views from and into the AONB, until such time as there has been a review of the AONB boundary.</p> <p>Once the AONB boundary review by Natural England has been completed, the Council will consider introducing local landscape designations to protect high quality areas of countryside that fall outside the AONB. The policy in the DMP will be rewritten to clarify the issue. Until the AONB boundary review has been completed, the AGLV will continue to be protected in line with the adopted Core Strategy policy, an approach consistent with a number of other Surrey authorities.</p> <p>However, regardless of this, the need for housing across the borough is recognised throughout the draft DMP document, and a number of potential development sites are set out to provide the necessary houses, some of which are beyond the current defined urban area.</p>	<p>No change</p>
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<p><b>NHE1(1)</b> - There should be reference to the Surrey Hills AONB Master Plan policies being applied in the Reigate and Banstead AONB, and also confirmation that equal weight will be given to the AGLV as to the AONB until such time as the boundary is revised.</p>	<p>Noted and agreed.</p>	<p>Development proposals within and in close proximity to the AONB will be expected to have regard to Surrey Hills AONB Management Plan added to NHE1 reasons</p>
<p>NHE2 - number of technical points which we would recommend should be addressed. Policy NHE2 states:  “.....a) Development which is likely to have a detrimental effect on the [Mole Gap to Reigate Escarpment] SAC (either individually or in combination with projects) will not be permitted... ’ ’  3.8 Whilst the objective of part a of Policy NHE2 in preventing negative effects on the SAC is supported, its wording is inconsistent with the requirements of the Conservation of Habitats and Species Regulations 2010 (as amended), the NPPF and also Policy CS2 of the Core Strategy. The proposed policy wording does not reflect the distinct stages of the Habitats Regulations Assessment process for Screening the need for An Appropriate Assessment to take place first, followed by Appropriate Assessment (if necessary), followed by the consideration of imperative overriding reasons of</p>	<p>Noted and agreed - the wording suggested has been largely incorporated into NHE2 in order to bring it more closely in line with the NPPF. However, we believe the use of the word 'valued' in NHE2(4) is suitable for keeping a distinction between priority habitats that provide value and those that do not.</p>	<p>Suggested wording large incorporated into NHE2(1)(2)(3).</p>

public interest (should it not be possible for adverse effects on the integrity of the SAC to be precluded).  
 3.9 Furthermore, we note that Policy CS2 (part d) of the Core Strategy (2014) offers different but similar wording, which appears to more closely reflect the requirements of the Habitats Regulations. The remaining provisions of Policy CS2 also deal with SSSIs and SNCI's respectively. We do therefore question the need for a duplicate policy to appear within the DMP.

3.10 Notwithstanding the above point, if Policy NHE2 (part a) is to be retained, we would recommend that it is amended as follows:

".....a) Development which is likely to have a significant effect on the SAC (either alone or in combination with other plans and projects) will be subject to Appropriate Assessment, and will only be permitted where it can be demonstrated that there will not be an adverse effect on the integrity of the SAC, or where it can be demonstrated that there are imperative reasons of overriding public interest for allowing the development to proceed"

3.11 Paragraph 113 of the NPPF states with respect to Local Plan policies that:

"Distinctions should be made between the hierarchy of international, national and locally designated sites, so that their protection is commensurate with their status and gives appropriate weight to their



importance and the contribution that they make to wider ecological networks”

3.12 Policy NHE2 clearly does attempt to achieve this, in that it deals separately with International Sites (Mole Gap to Reigate scarpment SAC), National Sites (SSSIs) and Local Sites (SNClS) separately and in turn. However, whilst the policy distinguishes between sites at different levels in the hierarchy, the protection that it affords to SSSIs is not consistent with that set out in the NPPF. Policy NHE2 (part 2)) currently reads:

”Development with in or adjacent to a Si te of Special Scient i f ic Interest wi ll only be permi t ted i f i t does not adversely af fect the special interest features or harm the beauty and int rinsic nature conservat ion features of the s i te.”

3.13 Firstly, the words “within or adjacent to” are in our view inappropriate, since the important question is whether or not a ddevelopment could have an effect upon the interest features of a SSSI (i.e. regardless of its location or proximity). This is reflected in paragraph 118 (bullet point 2) of the NPPF, which explicitly covers development “within or outside” (i.e. not necessarily adjacent to) a SSSI that is likely to have an adverse effect upon it. Additionally, whilst many SSSIs are indeed beautiful, the significance of impacts upon them should be considered in relation solely to their nature conservation interest (indeed this is

what is required by the NPPF).

3.14 Further to the above, Part 2 of Policy NHE2 currently does not envisage any circumstances under which a development that adversely affects a SSSI could be consented. Again, this is not consistent with Paragraph 118 (bullet point 2) of the NPPF, which permits such development "... where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest....".

3.15 In view of the above, we recommend that Policy NHE2 part 2 is reworded to the following: "Development that adversely affects the special interest features of a Site of Special Scientific Interest will only be permitted where the benefits of the development in that location clearly outweigh the impacts that it is likely to have on the features of the site that make it of special scientific interest."

3.16 Further to the above, the protection currently afforded to Sites of Nature Conservation Interest under Part 3 of draft Policy NHE2 has the following shortcomings in our view:

- As with part 2, the policy only engages where a development proposal is "within or adjacent to" an SNCI – this should be amended the same way as suggested above for Part 2, to cover development proposals which are likely to negative effect the

interest features of the SNCI (i.e. regardless of proximity);

- The wording of Part 3 (which covers SNCIs – a local level designation) reflects almost exactly the same protection that the NPPF affords to SSSIs under paragraph 118. It is not therefore clear that this part of the policy is consistent with the NPPF’s requirement for a ‘distinction’ to be made between sites of different importance in the hierarchy. We would recommend that additional words are added to this part of the policy to make it clear that the needs and benefits of any such development on those circumstances would need to be considered against the value of the affected interest features of the locally designated site

3.17 To address our concerns relating to Part 3 of Policy NHE3, we would recommend that it is revised as follows:

“Development that is likely to have an adverse effect upon any site designated as a Site of Nature Conservation Importance, Regionally Important Geological Site or Local Nature Reserve, will only be granted where:

- a) The need for, and benefits of, the development in that location outweigh the impacts on nature and geological conservation features and community value (considered to be consistent with the level at which the site is designated, unless evidence demonstrates otherwise); and
- b) It is demonstrated that adequate mitigation of or, as a last resort, compensation for, the impact of the

development will be put in place.”

3.18 We support Part 4 of Policy NHE2, and believe that it will work as intended to encourage development to deliver meaningful biodiversity enhancements. We would however recommend one minor modification, as Part 4a) states that development will be expected to ‘retain and enhance’ other valued priority habitats.

3.19 As the Council will be aware, Habitats listed as being conservation priorities under Section 41 of the Natural Environment and Rural Communities Act (2006) are not all necessarily of existing ecological value, since the purpose of the Section 41 list is to trigger the consideration of conservation action, due to the requirements for Local Authorities to ‘have regard’ to the conservation of biodiversity when considering activities that affect these habitats. The list of ‘priority’ habitats is very large and (for example) covers some 80% of all hedgerows, arable field margins and most deciduous woodland. Not all of these habitats are of significant ecological value (the purpose of the list of priority habitats is to encourage conservation action for these habitats, rather than infer existing value). As currently worded therefore, Part 4 of Policy NHE2 could be read to require the protection of ecologically unimportant habitats at the expense of other planning or nature conservation objectives. We suggest that the addition of the words “where appropriate” after the word “Retain” would address this issue.

<p><b>NHE2</b> - These proposals and their intentions are sensible but for ease of management they are based on the definitions of areas and their associated priorities. With regard to habitats and corridors no mention is made of agricultural practice. It is very clear that practice has changed and that there is a serious loss of hedgerows in Area 1 with long gaps existing which are caused by the clumsy use of flail cutters and sometimes by intention. The effect is to destroy wildlife corridors. Unfortunately agricultural commitments which attract incentives can be fulfilled in a number of different ways that tolerate hedge row loss. A comment that might add weight comes from a local professional ecologist who described Canons Farm and Perrotts Farm as ecological waste lands. Every day experience supports this view, house martins and swallows are no longer to be seen and skylarks rarely heard. This document could express preferences which help to sustain wildlife corridors and preserve visual amenity. One must also note that it is not in a developer's interest to be able to demonstrate biological diversity on the land to be developed. One of the species that exist in or near to agriculture is the human being. Spraying is carried out near to, even adjacent to homes, without warning or regard to wind direction. One policy provision should be to require notice to be given of the time and nature of spraying, even in hindsight to register annually with the local authority the type and date of sprays that were used. Such a procedure would be no different to the duty that water companies have to report the contaminants in</p>	<p>It is noted and agreed that modern agricultural practices are often extremely damaging to biodiversity, despite the common belief that such areas of land are particularly environmentally valuable. However, the suggestions noted here are significantly more than can be achieved in an individual development management plan and would require a shift in national agriculture policy to be implemented. The DMP does aim to protect green corridors that could be used by wildlife in policy NHE4 on green infrastructure.</p>	<p>No change</p>
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drinking water		
<p><b>NHE2</b> - Under point 4 b) it says that 'Be designed wherever possible to achieve a net gain in biodiversity e.g. by using green roofs and bird and bat boxes.....'. Some large areas of green/flat and shallow pitched roof, depending on their design and location have the potential to attract gulls in large numbers for nesting roosting and loafing which can increase the bird strike risk to the airport, therefore we would need to assess such proposals. We would ask that the following is added 'Respect Aerodrome Safeguarding Requirements'.</p>	Noted and agreed.	"With respect given to aerodrome safeguarding requirements" added to DES1
<p><b>NHE2</b> - We welcome the protection and enhancement of the Reigate Escarpment Special Area of Conservation (SAC), Biodiversity Opportunity Areas (BOAs), Local Nature Reserves (LNRs), Sites of Special Scientific Interest (SSSIs), Sites of Nature Conservation Importance (SNCIs) and Regionally Important Geological Sites (RIGSs). For clarity we propose the DMP includes a map showing the locations of all these designated areas in the Borough and explains how site allocation has been conducted to protect and enhance these areas.</p>	The proposal map will include designated areas	No change
<p><b>NHE2</b> -Spatial designations should include Ancient Woodland in the bullet points  1) After (SAC) add "Ancient Woodland (AW)".  1a) Insert " AW" after SAC  Reason The NPPF and DMP acknowledge that ancient woodlands are irreplaceable. Their ecology results from at least four centuries without</p>	<p>Policy NHE3 has been altered to emphasise the importance of ancient woodlands. It is therefore not felt necessary to also refer to ancient woodland policy into NHE2.</p> <p>Buffer zones have been proposed in the rewritten policy NHE3 for ancient woodlands; but the JNCC</p>	"This assessment should include consideration of the impact on habitats beyond the site boundary" added to NHE3(1),

<p>disturbance and they are the last few surviving remnants of the country's original forest cover. This type of ecology cannot be re-created through mitigation or compensatory provision. A number of other councils have already recognised the unique character of ancient woodland and prohibited development altogether.</p> <p>Ade a new point, 4c, "Establish appropriately sized buffer zones between the proposed development and the valued priority habitats or features of biodiversity importance."</p> <p>Reason This is good ecology practice.</p> <p><b>NHE3</b> The Policy should be re-titled "Protecting trees, woodland areas and natural habitats 1) Add the following after retention "within the site and an assessment of the impact on the habitats bounding and, where relevant, beyond the site." Reason It is important to capture the full impact on the local habitat. Confining the assessment to trees and hedges within site boundaries may miss important habitat impacts. 2) Linked to the proposed change to NHE2 1) above, reference Ancient Woodland should come out.</p>	<p>notes that "Buffer zones have generally not been included as part of SACs" (<a href="http://jncc.defra.gov.uk/page-1475">http://jncc.defra.gov.uk/page-1475</a>), so it is felt inappropriate to include such a clause in NHE2. It is considered good practice when screening developments for their effects on SACs to use a 15km radius around the SAC site, which seems like a big enough zone to ensure the protection of such sites.</p> <p>The point on the rewording of NHE3(1) is noted - the protection of trees is important for reasons relating to ecological networks of habitats as well as the individual value of trees. The policy will be reworded accordingly.</p>	
<p><b>NHE2(1a)</b> - We suggest 'Development which is in or adjacent to the SAC and likely...' as adjacent development can have a harmful effect. (3a)[ii] - We suggest insert 'significantly' prior to 'outweigh the impacts'. (4b) - We suggest also insert 'appropriate planting' in the brackets. We suggest add at the end 'or</p>	<p>The current wording of clause 1a is designed to reflect the requirements of Habitats Assessments, and actually covers any development that will have detrimental effect on the SAC, regardless of location. The suggested wording would actually weaken the protection afforded to the SAC. For clause 3a ii, addition of the word 'clearly' may be</p>	<p>"clearly" added to NHE2(3a)[ii]; "appropriate planting" added to NHE2(4b).</p>

planning permission will be refused’.	more in line with the NPPF policy wording. For clause 4b, agree with the addition of 'appropriate planting', however it is felt that the other suggested addition would make the policy too prescriptive.	
<b>NHE3</b> - Acceptable, but displaced replacement off-site of trees and woodland should not be permitted unless it would result in an improvement in visual amenity at the developed site.	Noted. Reasons for including trees off-site may extend beyond visual amenity so a clause has been added to the policy referring to 'exceptional circumstances'.	"in exceptional circumstances" added to NHE3(4).
<b>NHE3</b> - ancient and vintage trees should get a degree of protection from development if not formally designated. As I see it developers must retain these especially apart from being mature trees they need to be integrated into developments and should be seen as constraints.	Noted and agreed - the current policy is suitable for this as it calls for developers to perform an assessment of existing trees for their suitability for retention. Mature trees, whether designated or not, are considerably more likely to be considered suitable for retention. Wording has been added to NHE3 to require specific protection of good quality trees, as well as veteran trees, even if they are not designated.	NHE3(2) has been updated to require more specific protection for good quality trees and non designated features
<b>NHE3</b> - The DMP should include a map that shows the areas of ancient woodland – as well as areas previously ancient woodland that are required to be restored after working minerals.	The Reigate & Banstead Local Plan 2005 proposal map currently includes Ancient Woodland. A revised proposal map will be provided alongside the draft DMP and this will continue to identify ancient woodland. The elements identified on proposal maps are designations, planning constraints and site allocations. The inclusion of aspects required by planning conditions is not something appropriate to include on the proposal map or to map in the DMP otherwise.	No change



<p><b>NHE3</b> - Under point 3, it says that ‘Where replacement tree and hedge planting is required, appropriate species of tree should be used and sufficient space must be provided at the design stage for tree provision, including space to allow trees to reach their optimum size’. Some landscaping schemes, including tree planting, depending on the size of the scheme proposed, the location, the types and numbers of species to be planted, can attract birds in large numbers which in turn can increase the bird strike risk to the airport, therefore we would ask that the following be added, ‘Respect Aerodrome Safeguarding Requirements’. Gatwick Airport Ltd supports biodiversity and it is possible to achieve high standards of biodiversity without increasing the birdstrike risk to the airport.</p>	<p>Noted and agreed.</p>	<p>"With respect given to aerodrome safeguarding requirements" added to DES1</p>
<p><b>NHE3</b> - We are concerned that part 2 of Policy NHE3 groups Ancient Woodland with “important natural features, including trees, groups of trees, woodland and hedgerows” , and made subject to the same protection under the policy. 3.22 As is made clear by paragraph 118, bullet point 5 of the NPPF, Ancient Woodland is an ‘irreplaceable habitat’ that is, as a result, subject to particular and higher-level protection under the NPPF (along with veteran trees which also cannot be replaced within a meaningful time period). 3.23 Although the word “important” is used as a qualifier, we consider that this word is insufficiently well defined, since there are many ways to determine “importance”. It is inappropriate in our view to place features that are clearly of elevated</p>	<p>The policy has been rewritten to emphasise that the starting point for protected features (including ancient woodland) should be refusal. Whilst this groups ancient woodland with other protected features, this requires any planning application is taken on a site by site basis and would have to take account of the fact that these are irreplaceable habitats and the appropriate weight given to this.</p> <p>Those that are not formally protected are now grouped separately</p>	<p>further differentiation between ancient woodlands (now in NHE3(2)) and other features of lesser ecological value.</p>

<p>ecological value such as Ancient Woodland, into the same category as trees, woodlands and hedgerows generally, when their value is clear and established, in comparison to other features. Our view is that the policy as written therefore may not be effective when considered against paragraph 182 of the NPPF, because it could be interpreted to infer the same high level of protection to non-ancient woodland and non-veteran trees and tree groups on the basis of other forms of perceived “importance”.</p> <p>3.24 We recommend that this policy is redrafted to refer specifically to Ancient Woodland, veteran trees and ancient or species-rich hedgerows. A separate provision to the policy could then require that other types of woodland, trees or hedgerow be assessed to determine their ecological or other value, with appropriate weight being subsequently afforded to them in planning decisions.</p>		
<p><b>NHE3(2)</b> - Greater protection should be given to ancient woodland than other woodland areas. We suggest a separate, stronger, policy for ancient woodlands, together with the recommended guidance on distance of development from ancient woodland boundaries.</p>	<p>Agree that ancient woodlands must be covered with a strong policy. The policy wording has been amended so that all protected trees are included together and that their loss must be justified appropriately on a case by case basis.</p> <p>Ancient Woodland is also cover under Policy CS2 of the Core Strategy and in the NPPF, which all applicants must also adhere to.</p>	<p>Policy has been updated so that protected trees (including ancient woodland) and hedgrows are considered separately. The policy also now includes details on buffer zones</p>

<p><b>NHE3(4)</b> - We strongly support the policy of requesting replacement trees where appropriate. We suggest an additional policy of encouraging developers to provide additional street trees where appropriate, together with a financial payment to cover maintenance by the county council.</p>	<p>It is anticipated that additional tree planting can be covered by a slight update to NHE2(4)(b) to emphasise appropriate planting as a biodiversity strategy. Prescribing new street trees for all developments in this policy may not always be the most appropriate or cost-effective solution to dealing with biodiversity issues.</p> <p>The wording in DES1 would allow for street tree planting to be required if this was necessary to make the scheme acceptable. It is not felt that the policy needs to be this descriptive.</p>	<p>"appropriate planting" added to NHE2 reasons</p>
<p><b>NHE4</b> - The consultation document states that this policy “would be supported by a Green Infrastructure Strategy and Action Plan”. These are not included in the consultation. Please confirm that the Green Infrastructure Strategy and Action Plan will be consulted on publicly prior to the Regulation 19 consultation, so that changes to this, and to NHE4, can be reflected in the Regulation 19 consultation version of the DMP.</p> <p>Contributions must be obtained to fund green infrastructure from developers/owners of schemes, as with other forms of infrastructure, to support biodiversity, recreation and play, etc, and this green infrastructure must be managed in perpetuity rather than simply through a landscape maintenance contract.</p>	<p>The current intention is to publish and consult on a green infrastructure strategy prior to the Regulation 19</p> <p>Community Infrastructure Levy, which is a financial contribution required from new development, can be used for Leisure, open space and green infrastructure purposes. Site allocations in the DMP also detail what would be required in this regard to make a site suitable. OSR2 requires new development to provide open space and detail how they will be maintained</p>	<p>No change</p>
<p><b>NHE4</b> - Under point 2, mentions that ‘Development Proposals’ should:’ For the reasons stated above we would be grateful if the following be added ‘Respect Aerodrome Safeguarding Requirements’.</p>	<p>Noted and agreed.</p>	<p>"With respect given to aerodrome safeguarding requirements" added</p>

		to DES1
<b>NHE4:</b> All of this is welcome. 1a refers to increased access but it is not necessarily the case that an urban open space would be freely accessible and unrestricted by fencing. If green areas are to be other than visual amenity or a habitat access restrictions should be minimized.	Noted and agreed - the Council would like to see as much access as possible to green spaces, while accepting that some will inevitably be kept private and inaccessible. An aim to minimise restrictions on access will be added for clarity.	" Where possible, increase access to and provision of green infrastructure and open spaces" added to NHE4(2a)
No building on farm land, AONB areas, green belt, or allotments.	It would be against national policy to have a blanket ban on all development in all of these areas. However, the policies in the DMP, when taken alongside national policy and legislation, should provide sufficient restrictions to ensure only appropriate development takes place.	N/A
No policy for managing ancient woodland or green belt/green chain access and enjoyment and appreciation.	Ancient woodlands are discussed in Policy NHE3 and this policy has been updated to provide more narrative on protecting ancient woodland. Ancient Woodland is also cover under Policy CS2 of the Core Strategy and in the NPPF, which all applicants must also adhere to.  Public rights of way, the creation of green corridors for sustainable transport, and the use of green spaces (including greenbelt land) for recreational activity are discussed in Policy NHE4.	Policy has been updated so that protected trees (including ancient woodland) and hedgrows are considered separately. The policy also now includes details on buffer zones
<b>NPPF Policy list</b> - It is suggested that the list of NPPF policies should include NPPF paragraph 116 relating to major development in AONBs.	Noted and agreed.	Extract from Paragraph 116 of NPPF added to the policy context.

<p><b>Previously developed land/Urban extensions</b> - NHE1 'Landscape protection' and NHE4 'Green Infrastructure' have worthy aims but do not contain sufficient steer for previously developed land covered by Green Belt designations and land forming logical extension opportunities on the edges of settlements.</p>	<p>Both policies are intended to apply across the borough (with some aspects of NHE1 applying to land with particular designations), so the areas referred to are covered by the policies as currently written. There are more general policies which also cover things like design, access and parking which will apply to any development in the borough. Where the plan suggests site, it will also include details on what would be required (such as design features, mitigation etc) as part of this development. The Core Strategy and its policies (including Policy CS10) also cover this.</p>	<p>No change</p>
<p><b>Redhill</b> - I understand the proposed Hillsbrow development might invalidate the AONB designation for the greensand ridge area, and that areas to the east of Redhill and towards Nutfield have benefited from considerable conservation work (some of which I have participated in with the Reigate Area Conservation Volunteers and Surrey Wildlife Trust including woodland plantations and extensive wetland management, improving conditions for both wildlife and human wellbeing. I don't see how housing development in the area could fail to degrade these biodiversity interest features, and it certainly seems doubtful that they would 'enhance' them in any way.</p> <p>The leafy character of Redhill must be kept intact, including by not building on the green belt.</p>	<p>The Council is not aware of the proposed ERM1 development potentially invalidating any aspect of the AONB designation. The area has not been proposed for consideration as an extension of the AONB, and the AONB Board did not raise this issue with us in their own consultation response.</p> <p>Policy NHE2 requires all developments to demonstrate that they have not damaged biodiversity, and have achieved a net gain in biodiversity where possible. The most environmentally valuable parts of the area are dense woodland, some of which are ancient - these would be excluded from development, as stated in the site allocation</p> <p>Policy NHE1 calls for all development to "respect the landscape character of the locality", and this will include the "rural/urban interface" noted in the Redhill area in the 2008 Landscape Character</p>	<p>No change</p>

	<p>Assessment. The DMP suggests a 'phased' approach to land management during the plan period, where greenbelt land will only be released when a five year supply of housing land cannot be demonstrated in non-greenbelt areas.</p>	
<p><b>Reigate</b> -Plans for development in south Reigate will not protect the borough's landscape and biodiversity interest features. Within 50 years the open areas/Reigate and surrounding area will be unrecognisable. SC10 is further waffle.</p>	<p>The proposals for sustainable urban extensions (SUEs) in south Reigate (and elsewhere in the borough) are designed to meet the borough's housing needs in the most compact and sustainable way, thus preventing the need for extensive or sprawling development on other greenfield areas. The document proposes that these SUEs will only be developed if and when a five year housing supply cannot be demonstrated in existing urban areas - this is in line with national policy, which requires us to be able to demonstrate such a housing supply.</p>	<p>No change</p>
<p><b>SC10</b> - Don't allow developments like the massive solar energy farm in our beautiful countryside.</p>	<p>National policy does not allow for a blanket ban on solar development, but solar farm proposals would be subject to Policy NHE1(5) - they "will only be permitted where their impact (visual and noise) would not harm the landscape or undermine the intrinsic character or beauty of the countryside".</p>	<p>No change</p>

<p><b>SC10</b> - Not merely "wherever possible". Enhancement of the areas landscapes and biodiversity must be the starting point and developers must work around that. The clause 'wherever possible' renders this meaningless. Council will simply say at each point that it is not possible.</p>	<p>Objective SC10 requires that protecting landscapes and biodiversity interest features is a starting point and the minimum requirement, but that where there are opportunities to, new development should enhance these elements as well which is what the "where possible" is referring to. In addition, the presumption in favour of sustainable development in national policy means that a more restrictive policy than this would be unlikely to be found sound - it is not possible under national policy to make these into absolute red lines to stop development. In any such situation, the onus will be on the developer to demonstrate to the council why enhancement of landscape and biodiversity is not possible.</p>	<p>No change</p>
<p><b>SC11</b> - Whether this objective can be supported depends very much upon the detail of any policy and how it is applied. It is not considered that all development regardless of scale, type and impact should be required to contribute to Green Infrastructure. Experience elsewhere suggests that Green Infrastructure policies often impose very onerous standards upon development which does not necessarily put a strain on existing green infrastructure.</p>	<p>Noted and agreed that not all developments will be expected to contribute the same level of green infrastructure, but biodiversity and landscape protection, and appropriate landscaping, are important enough to at least be considered in all developments.</p>	<p>No change</p>

<p><b>TPO</b> - Consideration could be given, possibly in the justification, to indicating that the Council will take landowners who damage or fell protected trees to court with the prospect of heavy fines.</p>	<p>Felling protected trees is an offence, and one for which the borough already prosecutes offenders - at the time of writing, a developer has recently been fined £10,000 for damaging two trees protected by Tree Preservation Orders in Redhill. Consequently, it is not felt to be necessary to add this to the DMP document. However, the Council attaches great importance to the borough's trees and landscape and will look to undertake all necessary measures to ensure retention and protection of them.</p>	<p>No change</p>
<p><b>TPO</b> - We have found that the TPO process is overly slow moving and developers have cleared sites of ancient or important species and hedgerows so we reserve our rights to raise drafting changes on this policy.</p>	<p>Noted. The TPO process is a nationally set process - see this website for further information <a href="https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#Flowchart-1-Making-and-confirming-TPO">https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#Flowchart-1-Making-and-confirming-TPO</a>. The Council's Tree Officer carries out the process as fast as possible with their given resources.</p> <p>In addition, felling protected trees is an offence, and one for which the borough already prosecutes offenders - a developer has recently been fined £10,000 for damaging two trees protected by Tree Preservation Orders in Redhill. The Council attaches great importance to the borough's trees and landscape and will look to undertake all necessary measures to ensure retention and protection of them. Policy NHE3 sets out protection for trees covered by TPOs, however this is as far as planning policy can really influence this issue.</p>	<p>No change</p>



<p><b>TPO</b> - We would like to see an additional policy which proposes the preparation of an easily accessible and regularly updated document listing all trees covered by TPOs so local residents can monitor if unauthorised works are taking place. The current system is difficult to use and many of the TPOs are out of date.</p>	<p>The Council's 'Where I live' interactive map, available on its website - allows easy identification of both individual trees with TPOs and groups or areas of woodland which are protected.</p> <p>It is not necessary to include this as a policy in the DMP.</p>	<p>No change</p>
<p><b>Viability</b> - Can only apply to major development. Don't increase cost on small scale development with reports in planning application that mean nothing.</p>	<p>While the Council wants to encourage small scale housing development within the Borough, it is also believed that biodiversity and landscape protection, and appropriate landscaping, are important enough to at least be considered in all developments.</p>	<p>No change</p>
<p><b>Viability</b> - This should be achieved without compromising the viability of the proposed development. There is a limit to what private development can subsidise...but there should be a collaborative approach include central and local government.</p>	<p>Noted and agreed that not all developments will be expected to contribute the same level of green infrastructure, but biodiversity and landscape protection, and appropriate landscaping, are important enough to at least be considered in all developments. Viability will always be considered in assessing applications for planning permission and the requirements expected of developers on individual sites.</p>	<p>No change</p>
<p>SC10 - Urban watercourses often provide excellent opportunities to include biodiversity enhancements in a development. Land adjacent to watercourses is particularly valuable for wildlife and it is essential this is protected. Article 10 of the Habitats Directive also stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Such networks may also help wildlife adapt to climate change.</p>	<p>Noted. It is suggested that reference to green infrastructure in Policy NHE4 be expanded to include reference to 'blue-green infrastructure', emphasising the interrelated roles of water features and green spaces in encouraging the benefits expected from green infrastructure. This can also be expanded on in the forthcoming green infrastructure strategy which is intended to be consulted on and published in Autumn 2017.</p>	<p>Proposed the following wording is added to NHE4(1c] "and water features" and some references to "green infrastructure" changed to "blue-green infrastructure" to emphasise importance of water features.</p>

GREEN BELT		
<p><b>Further green belt review</b> - Some areas of the Green Belt have been assessed previously as being suitable for redevelopment without compromising openness and merging of settlements as part of the Sustainable Urban Extensions Study in November 2012. The findings of this appear to be ignored largely in the emerging consultation. This should be reviewed as part of a more comprehensive Green Belt Review than that published alongside this consultation.</p>	<p>This comment has been noted. The adopted Core Strategy required Reigate &amp; Banstead Borough Council to undertake a Green Belt Review which considers the purposes of the Green Belt to inform the identification of land for Sustainable Urban Extensions within the Broad Areas of Search; address existing boundary anomalies; review washed over villages and areas of land inset within or currently beyond the Green Belt throughout the Borough; and ensuring clearly defined and recognisable boundaries which are likely to be permanent and are capable of enduring beyond the plan period. This work has been undertaken and is outlined in the Development Management Plan Green Belt Review Evidence Paper. A Sustainable Urban Extensions (Stage 2) Site Specific Technical Report has also been undertaken to look in more detail at the strategic options identified in the stage 1.</p>	<p>No changes.</p>
<p><b>NHE5</b> - We consider this policy, as presently shown, to be overtly prescriptive and restrictive, particularly when compared to national Green Belt policy as set out within Part 9 of the NPPF. We draw particular attention to the section of the policy which deals with 'Replacement buildings within the Green Belt'. Whilst we agree that the design of any subsequent building and landscaping proposals should respect the character and openness of the Green Belt, we consider that developments which result in a form of development which has a lesser impact on the openness of the Green Belt than the buildings or buildings to be replaced, should</p>	<p>This comment is noted. It is felt that this policy is in line with part 9 of the National Planning Policy Framework but is necessarily descriptive in order to guide what would be appropriate development. Part 2e says that alternative locations of buildings within the curtilage will be considered favourably where this materially reduces the impact on the openness of the Green Belt.</p> <p>As stated in the reasons section the Council will use the floorspace of the building as at 19 December 1948 which is in line with national policy.</p> <p>Replacement of existing buildings in the Green Belt is covered by part 2 of the policy on replacement buildings in the Green Belt, this is felt to provide the support for</p>	<p>No changes.</p>

be viewed favourably.

Criteria 4 of the 'Replacement buildings' section of the policy should provide much greater clarity in relation to how development proposals will be assessed and whether the Council will use the proposed development footprint or floor area as the determining and comparable factor. It should also be confirmed whether floor area will be assessed in term of gross internal or gross external floor areas.

Finally, in light of extended permitted development rights enabling the conversion of offices to residential, as established via Schedule 2, Part 3, Class O of the General Permitted Development Order 2015, paragraph 2 of the 're-use and adaptation of buildings in the Green Belt' section of this policy is considered excessive. This is likely to result in the conversion of units via permitted development, which will in turn lead to a proliferation in the retention of poor quality buildings within the Green Belt, as opposed to facilitating the development of high quality schemes, which offer the opportunity to enhance the character and openness of the Green Belt.

Summary recommendation: The wording of this policy should be reassessed, with clearer guidelines in relation to how proposals for

replacing buildings where appropriate. We would not want to dilute this policy by allowing replacement buildings of different uses, particularly as this would then mean conflict with part 3 but a change use of use under Class O of the GPDO would enable the use to go from office to residential, then be replaced if this is what the landowner would like to do.

replacement buildings will be assessed.		
<b>NHE5</b> - The section relating to extensions or alternations to buildings in the Green Belt should also consider impact on the openness of the Green Belt (as is the case proposed for replacement buildings).	This comment has been noted. However, paragraph 89 of the National planning Policy Framework says that local planning authorities should grant the construction of extensions or alterations within the Green Belt provided that it does not result in disproportional additions over and about the size of the original building.	No changes.
<p>NHE5(4b) - concerning replacement dwellings where they are not materially larger having regard to the size of the plot and boundary separations. These matters are relevant to the general design of proposals and not relevant to the consideration of if the replacement building is materially larger and should therefore be omitted with this assessment being made against the general design policies.</p> <p>Furthermore, the section on the re-use of buildings is not consistent with the NPPF and is outdated as it sets a preference for the commercial re-use of buildings. Green Belt policy within the NPPF at paragraph 90 does not advocate this approach. The policy approach should recognise that the re-use of buildings in the Green Belt for residential purposes is acceptable in principle, as recognised by the introduction of permitted development rights in the GPDO for the conversion of agricultural buildings to dwellings. Other Surrey authorities which previously had policies setting a preference</p>	<p>This comment has been noted.</p> <p>Was NHE4(4b) now NHE4 (2d) : it is agreed that the size of the plot and the boundary separation are not relevant and his has been removed</p> <p>Re-use of buildings: Paragraph 90 of the National Planning Policy Framework outlines other appropriate uses within the Green Belt and says that the re-use of buildings provided that the buildings are of permanent and substantial construction is appropriate. Proposed policy NHE5 seeks for commercial buildings in the Green Belt to be retained as commercial buildings, unless evidence can be demonstrated that the premise is no longer viable. This is in line with the proposed retail and employment planning policies as per NPPF para 22.</p>	No changes

<p>for commercial re-use of buildings have since removed this stipulation from their revised plans. The Council should therefore consider the same approach.</p>		
<p>Policy approach NHE6 requires at part d) that new buildings are limited to their original use and not capable of adaption for alternative uses in the future. This approach is completely contrary to paragraph 21 of the NPPF which is clear that “Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances”. Buildings should be capable of being easily adapted to suit alternative uses in line with Green Belt and rural policy, which essentially encourages their re-use where appropriate.</p>	<p>This comment has been noted. This proposed policy specifically refers to new stables or associated structures and seeks to ensure that permissions aren't built with the intention for housing, as a way of getting around the planning system.</p>	<p>No changes</p>
<p><b>NHE5</b> - All fine except for re-use or conversion to residential use. These conditions open a pathway to residential development in the Green Belt, as follows: “Physically unsuitable for commercial .....”, this could be because it has become dilapidated through neglect or intent. “Remained vacant.....”, this could be because the owner had received no suitable offers to purchase, et voila! The buildings being discussed in this hypothetical situation would be present in the Green Belt because of their relationship to agriculture. If they were no longer of use for</p>	<p>This comment has been noted. Proposed policy NHE5 seeks to ensure marketing evidence is provided where alternative changes of use are proposed, the marketing requirements have been updated to require a more robust approach to marketing.</p> <p>In terms of previously commercial buildings, the same criteria would be applicable, marketing evidence would be required that the unit is no longer viable.</p>	<p>Marketing requirements have been updated</p>

<p>agriculture or other rural purpose they should be removed and the land allowed to revert to open Green Belt.</p> <p>The first of these provisions certainly applies to two barns in our immediate locality. What is not mentioned is the case of a building already existing within the Green Belt that has an approved use for a non-rural activity. What provisions would apply if the business ceased and the owner sought permission for residential development? This not uncommon situation must be referred to explicitly.</p>		
<p>NHE5(5b) - Our concern is that a 12 month period may not be an adequate benchmark for proving the non-viability of a commercial building and that a long term view is necessary. Attempts to market sites for commercial use where the landowner actually wants a change of use can affect how the site is marketed. For example a commercial site may not be able to attract a single purchaser or tenant but may be viable for shared use by several different tenants. For this reason we are of the view that if change of use is to be sought then a robust and transparent marketing strategy must be agreed at the outset and then regularly reviewed to ensure that what is being sought is realistic and priced appropriately.</p>	<p>This comment has been noted. It is felt that marketing requirements should be in line with those of proposed policy EMP4 (safeguard employment land and premises where there is a realistic prospect of continued use). This recognises the requirements of national policy that such land and premises should only be protected if there is a reasonable prospect of employment use. The marketing requirements have been updated to require a more robust approach to marketing.</p>	<p>Marketing evidence requirements have been made more robust and allow for longer time periods to be required where appropriate</p>
<p><b>NHE5:</b> The phrase 'to support the rural economy' is unclear. The reuse and</p>	<p>This comment is noted. "Rural economy" is a word used in national policy. The reuse and adaptation of buildings to</p>	<p>No changes.</p>

<p>adaptation of buildings to support the rural economy would require redevelopment to residential use to be accompanied by continued commercial or industrial use on the site, such as in a 'live-work' development. The proposed policy (2) under 'Reuse and adaptation of buildings in the Green Belt' could have a detrimental effect on the rural economy, the opposite to the intention stated.</p>	<p>support the rural economy does not mean that buildings would have to be converted to residential. Instead, it could mean for example that a derelict barn converted into a farm shop.</p> <p>The comment regarding part 2 is noted, however, marketing evidence would have to be provided to demonstrate that the unit is no longer viable. This recognises the requirements of national policy that such land and premises should only be protected if there is a reasonable prospect of employment use.</p>	
<p>The principle is enshrined within the NPPF and cannot therefore be faulted. However, despite the pressures for new development within the Borough the only approach to reviewing Green Belt boundaries appears to be the support of the Sustainable Urban Extensions and the minor reviews set out in the Green Belt Review June 2016 accompanying this consultation. We consider that a more comprehensive Green Belt review should be undertaken to determine how the required additional development can be delivered in a more sustainable manner.</p>	<p>This comment is noted. The Green Belt Review (June 2016) has been undertaken in line with policy CS3 of the adopted Core Strategy. Policy CS3 requires the Council to undertake a Green Belt Review to inform the identification of land for Sustainable Urban Extensions within the Broad Areas of Search; review boundary anomalies; review washed over villages and areas of land inset within or currently beyond the Green Belt throughout the Borough; and ensuring clearly defined and readily recognisable boundaries which are likely to be permanent and are capable of enduring beyond the plan period.</p> <p>A stage 2 for the Sustainable Urban Extensions was also undertaken. A paper on the Rural Surrounds of Horley has also been prepared to support the inclusion of the Rural Surrounds into the Green Belt.</p> <p>The Core Strategy Inspector's report can be found here which gives more context on this: <a href="http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/24/core_strategy">http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/24/core_strategy</a></p>	<p>No changes.</p>

<p>we should allow larger increases to existing houses in green belts. The rule of stopping extensions that affect the openness of green belts as applied currently are too restrictive and prevent households carrying out improvements to an ageing housing stock that can start to look run down. Families need greater flexibility in what they can do to their homes as occurs within the open area. reflecting the Character of the area should be adequate. The policy seems at odds to Govt policy when rural barns are being converted to houses but house cannot be extended.</p>	<p>This comment has been noted. Proposed policy NHE5 is in line with paragraph 89 of the National Planning Policy Framework which says that local authorities should grant extensions or alterations to buildings within the Green Belt provided that it does not result in disproportionate additions over and above the size of the original building.</p> <p>It is recognised that the General Permitted Development Order 2015 allows for the conversion of agricultural buildings to residential without planning permission. This doesn't however allow for the extension or enlargement of the existing buildings.</p>	<p>No changes.</p>
<p>Any site for allocation should be released by a Comprehensive Green Belt Review. There has been a deviation from the proposed way forward during the Core Strategy Inquiry. Paragraph 5.3.5 of the adopted Core Strategy states that a full Green Belt review is undertaken to inform release of sites through the plan process in line with NPPF. It would now appear that the Green Belt Review would focus solely on Reigate's preferred sites. This does not allow the public to understand all the potential sites that are available.</p>	<p>This comment has been noted. Paragraph 5.3.5 of the adopted Core Strategy says that a detailed Green Belt review will be carried out to inform the Development Management Plan. Policy CS3 of the adopted Core Strategy says that the Green Belt Review will include consideration of the purposes of the Green Belt to inform the identification of land for Sustainable Urban Extensions within the Broad Areas of Search; boundary anomalies; a review of washed over villages and areas of land inset within or currently beyond the Green Belt throughout the Borough; and ensuring clearly defined and readily recognisable boundaries which are capable of enduring beyond the plan period. This is what has been undertaken.</p> <p>The Green Belt review assessed all of the Broad Areas of Search including East of Redhill, East of Merstham and South of Reigate and proposed Sustainable Urban Extensions within all Broad Areas of Search, not only south of Reigate.</p>	<p>No changes.</p>



	<p>The Core Strategy Inspector's report can be found here which gives more context on this: <a href="http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/24/core_strategy">http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/24/core_strategy</a></p>	
<p>NHE5(4) - we would have wished to see extensions primarily limited to infilling or possibly restricted to a small percentage increase in the existing footprint together with restrictions/controls on any subsequent extensions.</p>	<p>This comment has been noted. The proposed policy is in line with paragraph 89 of the National Planning Policy Framework which says that extensions or alterations within the green belt should be permitted providing that it does not result in a disproportionate addition over and above the size of the original building.</p> <p>Using the date of 19 December 1948 is in line with national policy.</p>	<p>No changes.</p>
<p>The Council should seek to ensure that once the plans for developments in the Core Strategy are finalised all open land between neighbouring towns/villages and especially the airport be designated Green Belt and protected from any further development. It demeans the whole meaning of Green Belt if it includes wasteland that is not "countryside" in the true sense of the word. We should be releasing the Green Belt land we want developers to use, not allowing them to choose.</p>	<p>The comment has been noted. In order for Reigate &amp; Banstead to meet its housing target it is likely that there will be a need for a small amount of Green Belt land to be released for Sustainable Urban Extensions. The Core Strategy identified Broad Areas of Search including East of Redhill. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp; 2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release, based on a number of factors such as site constraints, sustainability and impact on the Green Belt, rather than being chosen because developers want to develop these sites.</p> <p>The Development Management Plan also identified a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released,</p>	<p>No change.</p>

	<p>as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released if and when the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p> <p>As national policy states, Green Belt boundaries should only be amended through the Local Plan and should be capable of enduring beyond the plan period (which is 2012 - 2027). The Council are proposing to put the Rural Surrounds of Horley into the Green Belt.</p>	
<p><b>Green Belt review - Land at Hengest Farm, Woodmansterne Lane:</b> The site at Hengest Farm has not been considered as part of a full Green Belt review. This was promised during the Core Strategy Inquiry.</p>	<p>This comment is noted. Policy CS3 of the adopted Core Strategy required the Council to undertake a Green Belt Assessment which considered the purposes of the Green Belt to inform the identification of land for Sustainable Urban Extensions within the Broad Areas of Search; assess existing boundary anomalies throughout the Borough; review washed over villages and areas of land inset within or currently beyond the Green Belt throughout the Borough; and ensuring clearly defined and readily recognisable boundaries which are likely to be permanent and are capable of enduring beyond the plan period. This assessment has been carried out and is detailed in the Development Management Plan Green Belt Review Evidence Paper.</p>	<p>No change.</p>
<p><b>SC12 -</b> Substitute 'prevent' for 'control'; and 'beneficial use' could be a potential backdoor for 'developers'</p>	<p>This comment has been noted. It is felt that the word 'controlled' is appropriate as it recognises that there is already some development within the Green Belt and seeks to guide proposals for extensions, replacement dwellings and the reuse and adaptation of such buildings. It also recognises that there may be a need for stabling and other</p>	<p>No change.</p>

	<p>equestrian development within the Green Belt and seeks to guide such development. These terms are also used in the objective, not the policy itself and it is the policy which any development must adhere with.</p> <p>'Beneficial use' refers to opportunities to improve the positive use of the Green Belt for example, look for opportunities to provide access to the Green Belt; to provide opportunities for outdoor sport and recreation; or to improve damaged and derelict land.</p>	
<p>should also consider the use of allotment sites for development and move existing allotments to out-of-town green field sites before developing on green field sites. Allotments were a necessity for food shortages during and after WW2, that is no longer the case. It would be a bold move but would halt the spread of housing into the green belt.</p>	<p>This comment is noted. This is something that has been looked at. However, a number of the allotment sites within the Borough are statutorily protected and the majority are also urban open land. They add to the character of the area and the amount of housing that could be delivered on the sites is limited. There is a high demand for allotments within the Borough and there are long waiting lists in some areas. Under Section 23 of the Small Holdings and Allotment Acts 1908 Council's have a statutory duty to provide a sufficient number of plots. The Allotments Act 1925 also specifies that land purchased or appropriated by local authorities for use as allotments must not be disposed of without Ministerial consent. The Section 8 of the Act also says that the Secretary of State must also be satisfied that 'adequate provision will be made for allotment holders displaced by the action of the local authority, or that such provision is unnecessary or not reasonably practical. Proposed policy MLS1 says that the proposed Sustainable Urban Extensions will only come forward when the Council are unable to identify a five year land supply. The Development Management Plan also proposes a number of town centre opportunity sites, these will be developed first.</p>	<p>No changes.</p>

<p><b>NHE5 (2)</b> - as before we need to be tougher on evidence that it cannot be used for a period of 12 months.</p>	<p>This comment has been noted. The marketing requirements have been updated to require a more robust approach to marketing.</p>	<p>Marketing requirements have been updated</p>
<p>Although perhaps repeating what is in the CS, there should be a reference to preserving openness and other functions of the Green Belt, such as the need to stop settlements from coalescing.</p>	<p>This comment has been noted. National policy also refers to the purposes to the Green Belt so it is not considered necessary to reiterate these word for word in the DMP - however, NHE5 does refer to the purposes with regard to specific requirements which is considered detail enough.</p>	<p>No change.</p>
<p>Emphasis should be given to the strategic importance of the green belt in preventing adjacent communities coalescing and also ensuring that transition between the urban and rural environment is controlled and that prevailing density of development close to the boundary of the green belt is progressively reduced.</p>	<p>This comment has been noted. National policy also refers to the purposes to the Green Belt so it is not considered necessary to reiterate these word for word in the DMP - however, NHE5 does refer to the purposes with regard to specific requirements which is considered detail enough. DES requires development to achieve an appropriate transition from the urban to the rural.</p>	<p>No changes.</p>
<p>The SUE areas have been reduced and the plan seems to retain the areas adjacent to the park and within the AGLV. This is strongly supported and should not be changed back to the Core Strategy plans.</p>	<p>This comment is noted. The Core Strategy identified Broad Areas of Search, further work has been done including a Green Belt Review of these areas, to identify proposed Sustainable Urban Extensions within the Broad Areas of Search.</p>	<p>No changes.</p>
<p>One point you have not examined in the connection of the seriousness of mental health issues and the concreting over of all our green belt.</p> <p>The Green Belt is the 'lungs' of the built up area. Developing it will mean more pollution or less 'lung capacity'. Don't build on it, even if it is 'low grade'.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to</p>	<p>No changes.</p>

	<p>deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner. Broad Areas of Search were identified in the Core Strategy and further work has been undertaken in order to identify the proposed sustainable urban extensions. This can be found in the Sustainable Urban Extensions Technical Stage 1 &amp; 2 Reports.</p> <p>Policy OSR2 requires that new developments include open space and OSR1 provides protection for all areas designated as Urban Open Space.</p>	
<p><b>NHE5</b> - I do not favour the wholesale scrapping on the Green Belt area in the Borough, this policy should not be taken as a blanket ban on new development. There may be a case for development in suitable and selected parts of the Borough's GB, notably in support of the national imperative to secure more affordable housing.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased</p>	<p>No changes.</p>

	manner.	
<b>SC12</b> - I am not sure what 'beneficial use' means?	This comment has been noted. 'Beneficial use' refers to opportunities to improve the positive use of the Green Belt for example, look for opportunities to provide access to the Green Belt; to provide opportunities for outdoor sport and recreation; or to improve damaged and derelict land.	No changes.
At a recent public meeting our MP Crispin Blunt stated that NO development of greenfield or green belt land would take place until ALL brownfield sites had been developed. This is very obviously NOT the case. Are we to assume that Mr Blunt is a liar? After Boris Johnson and Gove this is a very relevant question perhaps Mr Blunt would like to comment factually in non-weasel language, a simple yes or no. If no what is our MP intending to do about the obviously detrimental idea of reducing farming land to build poor quality housing? Since the populace were misled concerning Brexit we will need all farming land to be kept for that purpose as imports will be much more expensive for the general population.	<p>This comment has been noted. We are however unable to comment on behalf of MP Crispin Blunt.</p> <p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>Paragraph 83 of the National Planning Policy says that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan.</p>	No changes.

open up greenbelt to equestrians	This comment has been noted. Reigate & Banstead Borough Council recognise that horse riding is a popular leisure activity in the borough. Proposed policy NHE6 covers horse riding and equestrian facilities within the Green Belt. There are a number of paths and bridle ways already in the Green Belt but where the Green Belt is privately owned by a number of landowners and used for many different uses, it is not possible for the Council to ask these landowners to open their fields to landowners.	No changes.
<b>SC12</b> - Not merely "where possible". Safeguarding openness and enhancing beneficial use must be the starting point and developers must work around that.	This comment has been noted. 'where possible' relates to where possible enhance Green Belts beneficial use. For example, through opening up areas that were not previously available to the public. It does not mean where possible preserve Green Belt.	No changes.
<p><b>NHE 5</b> - few minor comments.</p> <p>We strongly support the continuing treatment of the reserve sites as if in the Green Belt until required for development.</p> <p>For clarity reasons, we suggest that the note in italics be slightly modified to read 'these policy approaches will 'also' be applied...'</p>	<p>These comments have been noted.</p> <p>These functions are stated on page 87 of the Regulation 18 Development Management Plan.</p> <p>Comments regarding 'also' have been noted and it is proposed to amend the policy to read 'these policy approaches will also be applied to nay reserve sites ...'.</p>	<p>Numbers updated</p> <p>Amend proposed policy NHE5 to read 'this policy will <b>also</b> be applied to any reserve sites ...'.</p>
<p><b>NHE5</b> - The policy should also refer to structures, in order to ensure the impact on openness is kept to a minimum. This could include equipment required for solar farms for example.</p>	<p>This comment has been noted. The openness of the Green Belt is protected by the Green Belt principles set out in national policy - para 87 of the NPPF states that "inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." With reference to renewable energy, Paragraph 91 of the National Planning Policy Framework says that within the Green Belt, proposals for renewable energy will not be permitted unless very special</p>	No changes.

	circumstances can be demonstrated. As such, it is not considered that this wording needs to be replicated in the DMP.	
<b>NHE6</b> - 1b) We would like to see this policy modified to include light pollution as ménage areas often include flood lighting.	This comment has been noted. Potential light pollution would be assessed through the design of the structure as per NHE6 (1b). Proposed policy DES1 and DES 10 also require any development to not have an unacceptable increase in terms of light pollution	No changes.
<b>NHE5</b> - The numbering system is confusing.	This comment has been noted. Numbers have been updated	Number updated
<p>Prior to the release of undeveloped Green Belt land to the south of Reigate and Redhill and the east of Merstham, the Council should look to maximise opportunities on previously developed sites within the Green Belt. Provided that brownfield sites are used ahead of development on the green belt</p> <p>National Planning Policy Framework encourages the effective use of land by reusing land that has been previously developed and requires local planning authorities to significantly boost the supply of housing.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional</p>	No changes.



	<p>circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.</p> <p>Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land.</p>	
<p>I'm sure some level ( couple of percent) around the edges will have zero impact on the borough's residents ability to enjoy it. You can't even get at a lot of the green belt anyway, as its private land.</p>	<p>This comment has been noted. Objective SC12 seeks to improve the beneficial use of the Green Belt where possible i.e. open it up to the public.</p>	<p>No change.</p>
<p><b>NHE5</b> - We strongly support the emphasis in 2), at the end of the policy, to resist changes from commercial uses to residential and trust this will be applied to the Legal and General</p>	<p>This comment has been noted. Should the Legal and General site in Kingswood come forward for housing then yes this policy would apply.</p>	<p>No changes.</p>

site in Kingswood.		
We need to ensure that the towns within the borough keep their identity and do not become one huge conurbation. If we are not careful, building on the countryside will turn Reigate into a suburb of London or Crawley.	This comment is noted. As outlined on page 87 of the Regulation 18 Development Management Plan, paragraph 80 of the National Planning Policy Framework says that preventing the coalescence of settlements is one of the key functions of Green Belt.	No changes.
If residents apply to build on green belt they are refused permission - it is totally out of order for the local council to bend the rules to suit themselves and rewrite the boundaries.	This comment is noted. Paragraph 83 of National Planning Policy Framework says that Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan which is the case here.	No changes.
If there is a desperate need for housing, that should be prioritised over someone else's view.	This comment has been noted.	No changes.
Many residents in the Redhill area live here because of the surrounding countryside; a number have moved to the area from London, wanting a different life for themselves and their children. Redhill is not a London borough and development, whilst necessary, should be in keeping with what makes the area special to residents and attractive to those outside the area.	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other</p>	No changes.

	<p>sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>Existing housing famine can only be addressed by reducing over large size of Green Belt in the Borough. This can only be achieved by releasing Green Belt land for housing, thus avoiding over density of brown field sites. Green Belt land must be released for development to achieve this, otherwise it will all have to be crammed into Horley and/or brownfield sites. Most of the Borough is included in the Green Belt. This is unsustainable. The part not included (Horley) is liable to flooding.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as</p>	<p>No changes.</p>

	<p>Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>Refuse all development in the green belt unless it is proven to be vital to the boroughs needs.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need</p>	<p>No changes.</p>

	<p>to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>Green Belt land is being designated to people who wish to sell their homes in London and move to a semi-rural area. Only in 25 years Reigate (south) will no longer be a semi-rural area. it will be a second Crawley</p> <p>In my view, protecting green belt means not building on it. Green belt land should not be built on as it is there to prevent urban sprawl and protect green spaces. object to any "creeping" of these developments within the Green Belt land in future.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p>	<p>No changes.</p>

Green belt doesn't need enhancing, just needs protecting

There should be no need to 'control' development on green belt. Development should be prohibited on green belt land full stop. Unfortunately the only control at the moment appears to be "stop anything apart from crammed in housing"

Object to building on the Green Belt whoever owns the land (Council or otherwise)

How can a local authority propose building new homes on Green Belt, whole purpose of green belt land was to protect the land around urban areas from urban sprawl to protect agricultural activities and the unique character of rural communities whilst at the same time, protecting the wildlife both flora and fauna. Do not agree that some green belt spaces are less important than others. The green belt was not established to necessarily be "beautiful" or categorised into "important" and "less important" but instead, for the reasons stated above you are neglecting your responsibility to both central government and to your communities by suggesting building on it. What will happen when the next lot of councillors decide at a later date that all green belt is not beautiful and decide to build on it??

However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.

The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 & 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options. The Council must balance needs (housing, employment etc) with protecting the built and natural environment. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints,

There should be no development in green belt areas. Once started a precedence will be set and it will not be possible to stop with pressure from developments always demanding green field sites. What's the point in having greenbelt if its status can be ignored later? The green belt means that building is not allowed so why are these laws made if they are going to be broken.

This should read to strongly resist any development on green belt land. It seems the council has no real control given that they've agreed to provide 2,300 homes every five years for the foreseeable future. Where is the option to 'block' development in the GB, as MP Crispin Blunt has assured us he will try to do? Again I don't see how development could possibly 'enhance' GB land

I am not happy with the wording of this, the word controlled implies that there is a plan to develop on green belt at some point in the future.

Green Belt was done on purpose in the past so there is enough green area around London and people who live near can enjoy countryside. There are fields and plenty of wild life and any large development will threaten it.

capacity considerations and deliverability issues which face the borough.

Paragraph 80 of the National Planning Policy Framework identifies the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. These purposes are taken into account when identifying potential site allocations in the Green Belt. The Green Belt designation does not take into consideration the aesthetics or quality of the land. One of the main criteria for identifying sites which could potentially be developed is whether they are sustainable or not.

Proposed policy NHE5 recognises that there are already houses and other buildings within the Green Belt and that there may be exceptional circumstances in which there is a need for development in the Green Belt. It proposes to guide what development would be appropriate in this context.

Other policies in the DMP seek to ensure high quality design of development, including policies DES1 and DES6.

Large parts of the Green Belt are not accessible to the public, objective SC12 of the DMP seeks enhancement of the Green Belt, for example through opening up areas that were not previously available to the public, creating footpaths and maintaining the land to a higher quality.

<p>I'm totally opposed to the use of the green belt, however if it has to be used it must be low level, low impact housing.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the</p>	<p>No changes.</p>
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	<p>Local Plan. Land will therefore not continually be released.</p> <p>The density of the sustainable urban extensions will be informed by the surrounding context. For example, policy DES1 requires that new development provides an appropriate transition from urban to rural, as well as other policy stipulation to provide a good quality development. Proposed policy DES5 seeks to ensure a range of housing types and tenures is provided on new developments. Should the density be lowered drastically on the proposed sustainable urban extension sites then further Green Belt release may be required.</p>	
<p>There must be no option to build on the green belt land within the area. brown field sites must be explored initially and where possible multi storey buildings designed that are sympathetic to the area</p> <p>Plenty of other land to use than green belt</p>	<p>This comment has been noted. National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>As such, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites</p>	<p>No changes.</p>

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National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.

The density of the sustainable urban extensions will be informed by the surrounding context. For example, policy DES1 requires that new development provides an appropriate transition from urban to rural, as well as other policy stipulation to provide a good quality development. Proposed policy DES5 seeks to ensure a range of housing types and tenures is provided on new developments. Should the density be lowered drastically on the proposed sustainable urban extension sites then further Green Belt release may be required.

In terms of development in urban areas, Policy DES4 seeks to encourage tall buildings in appropriate locations and Core Strategy Policy CS10 requires efficient use of land in new

	development, and states that development should be at an appropriate density, taking account of and respecting the character of the local area and levels of accessibility and services.	
<p>This should be protected and where we have pockets of green space this should be kept. Of you look at Hampstead village, Wimbledon Village, Battersea Village and Clapham Common Village you will see they're not building on these areas so why here. More urban houses back to back. Green space helps health of residents which aids everyone from less visits to GP, Hospital due to exercise and air quality and quality of life. Open space also helps control flooding.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner. Broad Areas of Search were identified in the Core Strategy and further work has been undertaken in order to identify the proposed sustainable urban extensions. This can be found in the Sustainable Urban Extensions Technical Stage 1 &amp; 2 Reports.</p> <p>The Council are required to balance needs (housing, employment etc) with protecting the built and natural environment. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460</p>	No change.

	<p>dwelling is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.</p> <p>Policy OSR2 requires that new developments include open space and OSR1 provides protection for all areas designated as Urban Open Space. The areas that are mentioned in this comment do not fall within the Green Belt but will likely also have protections (such as an equivalent to our Urban Open Space designation) which protects them from development.</p> <p>Other policies in the DMP restrict overcrowded development such as DES1 and DES6.</p>	
<p>Land designated as AONB, AGLV, SSSI, SAC should provide the greatest protection. There are hundreds of sites in the Green Belt, adjoining existing large and small rural settlements that can provide all the housing needs of the district, without releasing large sites for 500+ houses which have a more damaging effect on existing communities.</p>	<p>This comment has been noted. Proposed policies NHE1 and NHE2 seek to protect areas such as the AONB. For the Core Strategy, work was undertaken in order to identify the most appropriate way forward to meet the Council's housing need. On the basis of existing evidence, it was concluded that Sustainable Urban Extensions would be most appropriate.</p> <p>The Core Strategy identified Broad Areas of Search and further technical work has been undertaken to identify potential Sustainable Urban Extensions (Sustainable Urban Extensions Technical Reports 1 &amp; 2). These took account of sites constraints (including AONB, SSSI etc), sustainability and the impact on the Green Belt. Proposed policy MLS1 says that these sites will continue to be treated as Green Belt until the Council can no longer identify a five year housing land supply, they will then be released in phases.</p>	<p>No changes.</p>

	Reigate & Banstead Borough Council are not intending to release any sites for 500+ homes, the largest proposed Sustainable Urban Extension is SSW2 Land at Sandcross Lane - 260 dwellings including 50 retirement dwellings.	
What provision for enhancing the lands use does Watercolour provide? There is a health centre, Tesco, but apart from Lakes that are inaccessible I don't see any imaginative, healthy use of land for the occupants to enjoy.	This comment has been noted. As part of the Watercolour development a new health and fitness centre, new canal, wildlife corridor, amenity space, play areas, cycle paths and footpaths were developed. A sustainable drainage system was provided by opening up Gatton Brook and diverting it through reed beds, into a new canal and regenerated lagoons. Works have also been carried out to improve the nature reserve. Linden Homes pay Surrey Wildlife Trust £20 per dwelling per annum for the maintenance of the nature reserve.	No changes.
<b>HERITAGE</b>		
<b>NHE7</b> - requires all development proposals to preserve the historic fabric of conservation areas. The legal requirement to have regard to the desirability of preserving and enhancing the character and appearance of conservation areas (within S.72 of the Listed Buildings and Conservation Areas Act 1990) does not necessarily require the preservation of all of the historic fabric. This approach would rule out the potential for well-designed and sensitive new redevelopment in a conservation area which might result in the loss of historic fabric but improve the character or appearance of the area or better reveal the significance of other buildings. The significance of each Conservation Area should be made clear in the	Preserve historic fabric will be removed	NHE7 - removed "Historic fabric"

Conservation Appraisals for each area.		
Policy NHE8 states that proposals for the demolition of listed or locally listed and features of character will be resisted. The policy is not compatible with national policy and should adopt the same approach as paragraphs 132-134 of the NPPF, whereby a more proportionate approach is advocated.	The policy has been updated to reflect that proposals should be assessed having regard to the significance of the asset	Policy updated
NHE 10 - when a field evaluation is carried out there should be a requirement that the results are written up within a reasonable time frame.	This would not be appropriate for inclusion in the Development Management Plan, it is overly prescriptive and not easily enforceable	No change
If a 2nd runway at Gatwick is approved we will lose 17 listed buildings in this area.	Gatwick Airport, including the area proposed for the 2nd runway is located within the borough of Crawley. Any loss of listed buildings would have to be justified.	No change

<p>NO cultural allowance made at all - unless I have missed the plans for the nature centre and theatre hidden among the lego houses.</p>	<p>Core Strategy Policy CS12 states that the Council will seek provision and maintenance of leisure and community facilities and open spaces from new development. DMP Policy NHE4 covers the provision of green infrastructure and ORS2 requires new developments to provide open space. Urban extensions will need to be masterplanned so the specific requirements for these can be agreed on a case by case basis by the Council. Some of the site allocations require the inclusion of community facilities. A new policy in the DMP has been included on community facilities (policy DES9). A Local Nature Reserve has recently been designated at Banstead Woods and Chipstead Downs. Cultural/leisure facilities such as theatres would be matters for private businesses to bring forward.</p>	<p>No change</p>
<p>There should be no new development especially on heritage sites.</p>	<p>Reigate &amp; Banstead Borough Council have a post-NPPF adopted Core Strategy with a housing target of 460 net dwellings per annum. As such, it is not an option to deliver no new development. However, the Development Management Plan seeks to protect heritage assets, and policy NHE7 seeks to protect both listed and locally listed buildings and their settings in line with national policy which states that as heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.</p>	<p>No change</p>

Buildings should be retained, such as Horley Police Station.	Any development which involves buildings which are locally or statutory listed will need to be suitably justified, including development which will impact on their settings.	No change
I applaud the reuse of derelict/brown field sites and the conversion of well loved buildings for other uses. eg Police stations. Such conversions help community continuity, allowing the retention of well loved, if not always listed buildings.	Comment is noted. For information, the policy team are currently preparing a brownfield register to support reuse of brownfield/conversion of vacant buildings as appropriate	No change
Ensure any heritage properties are not further ruined by ill considered planning and highway policies	The objective of policies NHE7 is to protect the borough's heritage assets. Any loss of, or development which will impact on, locally or statutory listed buildings will have to be justified and the benefits must outweigh the negatives in line with the significance of their grading.	No change
You need to do this in Redhill in particular. Redhill has been stripped of its historic character.	"Policy NHE7 - Heritage Assets" is a general, borough-wide policy. Any site specific policies will include measures to protect heritage assets where applicable	No change



<p>Yes, but I would like to see this a far less Reigate centric. It is as if the Council prioritizes Reigate over the rest of the borough in this regard.</p>	<p>"Policy NHE7 - Heritage Assets" is a general, borough-wide policy; it does not prioritise one area over another. Any site specific policies will include measures to protect heritage assets where applicable.</p>	<p>No change</p>
<p>These are all important aspects affecting the lives of inhabitants. I think the historic environment to be very important in building self respect. Redhill has much to be proud of as a railway town and a route town. That should be celebrated and remembered</p>	<p>Comment is noted - the policies in the Core Strategy and the DMP seek to support the historic environment.</p>	<p>No change</p>
<p>Important to keep these as long as a benefit to the community and financially viable.</p>	<p>"Policy NHE7 - Heritage Assets" recognises that it is vital that heritage assets are protected, and that they are treated in accordance with the character and significance of their grading. However, it is also important that local plan policy includes flexibility to ensure that the continued use and maintenance of these assets is viable. This is what the policy seeks to achieve.</p>	<p>No change</p>

<p>Keep the bar high on which heritage assets are really important. Don't let minor/ significant heritage storeys block necessary development for housing. Life needs to move on, we have a housing and schools crisis, so some history should be put aside.</p>	<p>"Policy NHE7 - Heritage Assets" recognises that heritage assets should be protected in accordance with the character and significance of their grading, and does not preclude development if the benefits of the development outweigh the negative of the impact on the heritage asset. The process of identifying heritage assets is done at a national level, county level and at a local level. At a local level this process of identifying locally listed buildings is not within the remit of planning policy but does recognise that a balance needs to be sought between heritage assets and supporting growth. Regarding conservation areas, the National Planning Policy Framework requires that designations are worthy of the status to avoid devaluing those areas that are worth preserving (paragraph 127).</p>	<p>No change</p>
<p><b>NHE 8</b> - We suggest 3) is amended to include the phrase ‘...providing any associated development is acceptable in terms of its relationship to the listed building, and character of the surrounding area.’ as often the conservation of protected buildings is accompanied by enabling development.</p>	<p>It would be acceptable to include this - based on the requirement of paragraphs 128/129 of the National Planning Policy Framework (NPPF), which mention contributions made to heritage assets by their setting.</p>	<p>Added to NHE8 (3) "any associated development should be acceptable in terms of its relationship to the listed building, and character of the surrounding area"</p>
<p>As long as this does not include the cinema facade in Redhill. This is a 1950s monstrosity, not a heritage site!</p>	<p>Comment is noted. This is a matter for the Development Management team to decide as part of the planning application process</p>	<p>No change</p>

<p>These assets are what make the area such an attractive place to live. They also bring in big visitor numbers which ultimately benefits councils and businesses financially.</p>	<p>Comment is noted - the policies in the Core Strategy and the DMP seek to support the historic environment.</p>	<p>No change</p>
<p>If there is a policy why is the Chequers Hotel targeted. No new hotel/Guest house planning permissions should be granted until the Chequers is reopened.</p>	<p>"Policy NHE7 - heritage assets" is concerned with the protection of heritage assets. The Sangers House part of the site has been removed from this site allocation given the recent planning approval. The site allocation recognises that sensitive design will be required to take account of the locally listed buildings, both in terms of Sangers House and the south part of the Chequers hotel building.</p>	<p>No change</p>
<p>I think well known heritage sites will be protected. That's easy to accomplish especially as in Reigate, they are often hilly areas.</p>	<p>Comment is noted - the policies in the Core Strategy and the DMP seek to support the historic environment.</p>	<p>No change</p>
<p>encourage businesses to occupy listed buildings and relative short term business advertising on buildings should not be so prescriptive esp when an adjacent non listed building appears covered with business advertising.</p>	<p>It is not within the remit to encourage businesses to occupy listed buildings but "Policy NHE7 - heritage assets" does support viable continued use and maintenance of heritage assets. Advertisement rules are set by national policy (available here <a href="https://www.gov.uk/government/publications/outdoor-advertisements-and-signs-a-guide-for-advertisers">https://www.gov.uk/government/publications/outdoor-advertisements-and-signs-a-guide-for-advertisers</a>). Design of advertisements is covered by Policy DES12 of the DMP.</p>	

<p>We note that the Council refer to paragraph 126 of the Framework in the Policy Context for NHE7-10 (page 91 of the DMP) which states: Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment .... In doing so they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation ..... the desirability of new development making a positive contribution to local character and distinctiveness We refer you to paragraph 135 of the Framework which states: 'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.' Proposed Policy NHE8 makes no distinction between designated and non-designated heritage assets. We disagree with this approach and consider that Proposed Policy NHE8 is not consistent with the provisions of paragraph 135 of the Framework. We consider that the proposed</p>	<p>The policy has been updated to reflect that proposals should be assessed having regard to the significance of the heritage asset</p> <p>The list of locally listed heritage assets is reviewed and updated, although this is not within the remit of the planning policy team.</p>	<p>Policy updated</p>
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<p>policy does not make provision for the required balanced judgement when weighing applications having regard to the scale of any harm and the significance of a non-designated heritage asset. We note Historic England Advice Note 7 – Local Heritage Listing, recommends reviewing and updating the list of locally listed heritage assets regularly. It states that removal of assets from the list may be appropriate in circumstances where an asset no longer meets the criteria for selection, has been demolished or has undergone changes that have a negative impact on its significance.</p>		
<p>Evidence base and justification for policies <b>NHE7 - 10</b> The borough's archaeological Supplementary Planning Guidance, which is referenced in the supporting "Reason" below the policy dates from 1993 and contains numerous references that are now out of date or have been superseded by subsequent innovations in policy and practice. We therefore recommend that this Guidance is rewritten to reflect current practice. Our heritage team would be pleased to advise further on this if required.</p> <p>Proposed Policy <b>NHE10</b> We are concerned that the archaeological principles set out in proposed policy NHE10 do not specify any provisions for archaeological work post-determination. NPPF (paragraph 141) is clear that local planning authorities should "...require developers to record</p>	<p>There will be the opportunity to update the Archaeological SPG once the DMP is adopted</p> <p>Policy NHE10 - all of the heritage policies have been combined to reduce repetition and provide a more comprehensive cover of herigate assets. However, suggested wording has been included in this new combined policy (Policy NHE7 - Heritage Assets)</p>	<p>Suggested wording has been included in the new combined policy (Policy NHE7 - Heritage Assets)</p>

<p>and advance understanding of the significance of any heritage assets to be lost... and to make this evidence (and any archive generated) publicly accessible". The saved local plan policy PC8 makes provision for this requirement by specifying that developments may require agreed schemes for "investigation, monitoring and recording", but the provision is absent from the proposed new policy which might be considered to render it non-compliant. We therefore recommend the insertion of an additional clause within policy NHE10, along the lines of: <u>4) Where research indicates remains of archaeological significance will be, or are likely to be encountered on a site, the Borough Council will require submission and agreement of schemes for the proper investigation of the site, recording of any evidence, archiving of recovered material and the publication of the results of the archaeological work as appropriate, in line with accepted national professional standards.</u></p>		
<p>Conservation Areas          1. The shopping parades of Tadworth – along Cross Road and between the Avenue junctions – along with the Tadworth Station building and approaches ought to be designated. The latter also merits local listing.          2. The properties running along the Dorking Road southwest from the railway cutting up to and including the Blue Anchor Pub and the properties along the lane behind the pub.</p>	<p>Designation of Conservation Areas and listed buildings are not within the remit of the DMP</p>	<p>No change</p>

<p>with Grade I and II Listed buildings, it is the obligation of the owner to maintain and preserve the fabric of the building and the Council needs to use its enforcement powers rather than both allowing the building to get into a poor state and then arguing that an enabling development is the means of financing repairs and maintenance that should already have been carried out at law. There are also rules on preserving the curtilage of listed buildings which need strengthening or adhering to and to stop areas being tarmacked over to facilitate development later.</p>	<p>This comment is noted, text can be added to the reasons section of "Policy NHE7 - Heritage Assets" to make it clear that deliberate neglect will be taken into account in determining planning applications.</p> <p>"Policy NHE7 - Heritage Assets" requires the settings of listed or locally listed buildings to be protected as part of development. Any impact on the setting of these must be suitably justified.</p>	<p>Text around deliberate neglect added to the reasons section of NHE7 as follows: "Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the listed building should not be taken into account in any decision. "</p>
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**THEME 3**

<p><b>CEMETERIES/CREMATORIUMS</b></p>		
<p>Not sure if this means you plan to build them or not</p>	<p>The council is not currently planning any new or extended cemeteries or crematorium, although</p>	<p>No change</p>
<p>Not clear what the sustainability principles are</p>	<p>Those criteria listed in draft Policy CEM1</p>	<p>No change</p>
<p>It's interesting that burial provision takes precedence over health provision</p>	<p>Whilst provision and expansion of health facilities do not have a separate policy, sufficient provision is vital, and is dealt with by Policy INF1. Future needs are considered in the Health Infrastructure Needs Evidence Paper 2016 and in the Infrastructure Delivery Plan 2017.</p>	<p>No change</p>

This policy must also include “and adequate parking to be agreed with the Council”	Agreed, parking provision is important for cemeteries, and this will be added to the policy	<b>Policy CEM1(1) has been amended to include criteria for adequate parking to be available.</b>
Potential employment opportunity	Noted, but not significant employment	No change
<p>All of part 1 seems sensible.</p> <p>The presumption in 2 that they should be located in the developed area seems questionable. There is a great shortage of land for housing, why use available land in these areas for the dead?</p> <p>Why not use Green Belt sites? Crematoria, in particular, tend to be enclosed in beautiful gardens that are quite consistent with green surroundings. The atmosphere is always of respectful calmness and quietness. An effect that might have been overlooked is the stabilizing effect that such a site would have on the immediate surroundings. A suitably designed cemetery could have a very similar ambience. The green belt would be eminently well suited for this purpose.</p> <p>No statistical predictions are presented for death rates in the borough or for preferences vis à vis cremation and burial. Shouldn't the people of the borough accept disposal of their dead as their responsibility and not shuffle this off to neighbouring boroughs?</p>	Cemeteries need to be close to where people live so that they can visit, and so are not helpfully located in the countryside. Also, the government has said that green belt sites are in general not suitable for cemeteries. The Cemeteries and Crematoriums Evidence Paper 2016 prepared to support the draft Development Management Plan 2016, includes data on death rates in the borough (paragraph 7.8), and advises that nationally 75% of people are cremated, compared to 25% opting for burial. Locally cremations are approximately 80% of funerals. (paragraph 7.9)	No change
No one can disagree with this. It is essential as people do die, so adequate provision is required.	Noted	No change



<p>We support this policy but would prefer there to be an additional point in 1) stating that 'There is demonstration of need'. This is because it is recognised that neither new cemeteries nor crematoriums are likely to be sited in urban areas. Even if the proposal is in countryside not covered by Green Belt designation, there will still be an impact on the landscape and probable loss of agricultural land.</p>	<p>The Cemeteries and Crematoriums Evidence Paper 2016 prepared to support the draft Development Management Plan 2016 identifies that there will be a need for further provision for cemetery space and crematoria provision within and beyond the plan period. We consider that adding and additional policy requirement to demonstrate "need" for cemeteries or crematoria on non-green belt land is not necessary, as there is very little land outside of urban areas that is not designated as Green Belt; this land is designated as being the Rural Surround of Horley, liable to flooding, or otherwise identified as having potential for future development.</p>	<p>No change</p>
<p>Depends on whether a need is identified. Not sure there is a need for burial provision as most people are cremated. We have a local crematoria and Garden of Remembrance that copes well</p>	<p>The Cemeteries and Crematoriums Evidence Paper 2016 acknowledges that some 80-85% of people who die in the borough are cremated. It is most unlikely that a new or extended cemetery would be proposed by the Council or a private company if there was no demand for it.</p>	<p>No change</p>
<p>Cremation is preferable to having more burial land, and is sustainable. Cremation should be encouraged, probably by pricing.</p>	<p>The majority proportion of people who are cremated is taken into account in assessing future needs</p>	<p>No change</p>
<p>We are getting built up so need to find a way to reuse previous sites / or green burials or cremations with beautiful parks / gardens to lay.</p>	<p>Noted</p>	<p>No change</p>
<p>The Environment Agency is a consultee for development relating to using land as a cemetery, including extensions.</p>	<p>We will consult all the relevant statutory consultees on planning applications for</p>	<p>No change</p>

	cemeteries, whether new or extensions.	
More green / woodland burial sites (and tree pods). Cemeteries should be considered in terms of their benefits as sites which often have high nature conservation and biodiversity potential. The policy should include provision of sites for woodland burials. Could liaise with Woodland Trust and Centenary Wood for green burials.	These are more sustainable, although if proposed in Green Belt, must also demonstrate that very special circumstances existing that outweigh potential harm	No change
There will be no green belt surrounding Reigate when you have finished, which will be never. This point PS2 is obtuse and waffle. Just say what you mean. You will be building for decades and never resolve the current housing crisis for local people	This objective does not relate to Green Belt land	<b>In Theme 3, amend Objective PS2: Allocate site(s) for cemetery and / or crematorium provision consistent with sustainability principles (no longer proposing to allocate a site)</b>
Should be within easy access of public transport	This is reflected in criteria 1a)	No change

Gypsy, Travellers and Travelling Showpeople		
need to stop unallocated sites being permitted at appeal	Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. Having a plan in place which accords with this policy will help to stop sites being permitted at appeal.	No change.
I dont see the need for this. Local existing sites if necessary can be expanded. Due to Brexit we should see a reduction in the previously anticipated increase in travellers especially from south east Europe We do not need any more gypsy sites. If the need increases then current sites should be expanded. As mentioned earlier the influx of travellers from Roumania and other parts of SE Europe will cease after Brexit so any earlier calculations need revisiting.	Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. The outcomes of the UK's departure from the EU currently remains very unclear and is unlikely to be understood in the near future. We cannot make assumptions, we have to use an evidence base and additional need has been identified through the Gypsy and Traveller Accommodation Assessment 2017.	No change.
It's our legal obligation	Comment is noted	No change.

<p>Whilst many might say the target should be zero, I believe that effective enforcement to prevent antisocial occupation, fly tipping and damage to property must have an effective counter offer: ie traveller pitches. Note: the above behaviors are based solely on personal observation, and does not apply to travelling show people.</p>	<p>Whilst sites will be allocated in the Development Management Plan, these will still be subject to detailed planning permission, which includes planning conditions where necessary and appropriate. These conditions will be enforced through the Council's enforcement action.</p> <p>Anti-social behaviour should not be tolerated, and be dealt with as for all other members of society, through the usual and correct policing, legal, and community processes.</p>	<p>No change.</p>
<p>Gypsy and traveller sites bring with it intimidation and disquiet in the local environment/neighbourhood. No. They should not be encouraged into this area at all.</p> <p>There are too many environmental and social problems associated with this proposal</p>	<p>National planning policy requires Local planning authorities to assess the level of need in their areas and to seek to accommodate this. We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p>	<p>No change.</p>
<p>In my opinion traveller sites in the countryside should not be an option.</p>	<p>The Council is obliged though national planning policy to assess the need for accommodation, and allocate sufficient sites. The Core Strategy sets out that in the allocation of sites a sequential test should be applied, placing urban sites before those in the countryside, with those in the Green Belt being a last resort, which reflects national policy. The assessment of sites for Traveller pitches and Travelling Showpeople's plots has considered sites from various locations across the borough. Sites were subject to an assessment process which looked at their suitability, availability and achievability, as well as their impact on the Green Belt if applicable. Green Belt sites have been assessed against the purposes of the Green Belt and ruled out as appropriate.</p>	<p>No change.</p>

<p>These communities need to do much more to demonstrate that they are good neighbours before anyone would willing support this.</p>	<p>National planning policy requires Local planning authorities to assess the level of need in their areas and to seek to accommodate this. We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p>	<p>No change.</p>
<p>These hold little interest for me. Suffice to say, I have no issue with the travelling community if the land is treated well. If a specific traveller site existed would the council be responsible for its upkeep? This is unclear.</p>	<p>National planning policy requires Local planning authorities to assess the level of need in their areas and to seek to accommodate this. However these are not publicly provided or funded sites; they are privately purchased and would require planning permission. Planning permissions can contain conditions, and non-compliance with the conditions can lead to enforcement action at sites in the same way as for the rest of society</p>	<p>No change.</p>
<p>There is already an issue with Gypsy/Travellers in the area. There have been a couple of occasions that I have taken my family away from Horley Town centre as it hasn't felt safe. Putting a site to close to any of the towns is going to cause more issues, but I understand that this is a problem that isn't easy to deal with.</p>	<p>National planning policy requires Local planning authorities to assess the level of need in their areas and to seek to accommodate this. We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p>	<p>No change.</p>
<p>As a resident of Purely where a travellers site has been proposed, after rejection from 3 sites already, I have some sympathy for the way these families are treated. However, if</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to</p>	<p>No change.</p>

travellers prove their respect for the land and environment and contributed towards helping the community to improve and maintain the land there may be a better balance

seek to meet this need. The Gypsy and Traveller Accommodation Assessment 2017 identified additional need for sites.

We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.

Travellers do incorporate travelling as a large part of their lives, but also need permanent bases, in particular when children are in education or there are health needs within the family. Given this they are required to pay Council tax. There are a number of existing private Traveller sites in the borough, there are no currently Council run sites and there are no Council run sites proposed.

Anti-social behaviour should not be tolerated, and be dealt with as for all other members of society, through the usual and correct policing, legal, and community processes. Where there is breach of planning conditions on a site, enforcement action will be taken to rectify this.

<p>The area does not need any further gypsy/travellers sites. Focus on protection and prevention of incursions on council land and/or greenbelt</p>	<p>National planning policy requires Local planning authorities to assess the level of need for Traveller accommodation in their areas and to seek to accommodate this. The Council have undertaken an assessment of need, outcomes of which can be found in the Gypsy and Traveller Accommodation Assessment 2017. Incursions are dealt with through appropriate action.</p>	<p>No change.</p>
<p>I don't believe this element of society should be singled out to target. Rather everyone that the state should be providing housing and social services for should be considered in the mix</p>	<p>In line with national planning policy local planning, authorities must assess the needs of different groups in society for housing, which Reigate &amp; Banstead has done through development of its Strategic Housing Market Assessment and make provision for these needs.</p> <p>The government requires a slightly different approach in assessment of Travellers, reflecting the needs of the travelling community. Local planning authorities are required by national planning policy (Planning policy for Traveller Sites 2015) to assess the need for accommodation of Travellers within the borough, and to seek to identify suitable sites to meet this need. The proposed policy is in line with national policy</p>	<p>No change.</p>
<p>These become problem areas and I do not support any action to identify potential sites</p>	<p>Comment is noted. Local planning authorities are required by national planning policy to assess the need for accommodation of Travellers within the borough, and to seek to identify suitable sites to meet this need.</p>	<p>No change.</p>
<p>This needs attention as I've only been in Horley 8 months and seen this issue first hand.</p>	<p>Comment is noted.</p>	<p>No change.</p>

<p>This is a racist suggestion. You are not suggesting ghettos for any other minority groups. There is insufficient land to allocate sites for any one group.</p>	<p>In line with national planning policy local planning, authorities must assess the needs of different groups in society for housing, which Reigate &amp; Banstead has done through development of its Strategic Housing Market Assessment and make provision for these needs.</p> <p>The government requires a slightly different approach in assessment of Travellers, reflecting the needs of the travelling community. Local planning authorities are required by national planning policy (Planning policy for Traveller Sites 2015) to assess the need for accommodation of Travellers within the borough, and to seek to identify suitable sites to meet this need. The proposed policy is in line with national policy</p>	<p>No change.</p>
<p>I doubt there will be much support for this, given the impact these sites have on crime levels and house prices across the country.</p>	<p>Comment is noted. Local planning authorities are required by national planning policy to assess the need for accommodation of Travellers within the borough, and to seek to identify suitable sites to meet this need.</p>	<p>No change.</p>
<p>MVDC notes that RBBC's updated Gypsy and Traveller Accommodation Assessment has identified a total need for 39 additional pitches for gypsies and travellers with site-specific proposals to follow.</p> <p>MVDC's most recent Travellers Accommodation Assessment (for the period 2012-2027) identifies needs for 44 additional gypsy and traveller pitches and 7 plots for travelling showpeople within Mole Valley. This assessment pre-dated the August 2015 Planning Policy for Traveller Sites and will need to be updated as part of Mole Valley's</p>	<p>We acknowledge the need to take a strategic view across borders with neighbouring authorities and RBBC will continue to maintain a conversation with MVDC in line with the Duty to Co-operate. We would note however that we have not been able to identify any extra capacity so would not be able to accommodate any neighbouring Traveller needs.</p>	<p>No change.</p>



<p>Local Plan process. However, it is clear that finding sufficient land to meet the above requirement in full will be a significant challenge, bearing in mind the constraints, including Green Belt and Area of Outstanding Natural Beauty which cover a substantial proportion of Mole Valley District.</p> <p>There is little realistic prospect that MVDC will be in a position to assist in making provision for traveller sites to meet identified needs from other Districts. Nevertheless, bearing in mind the nomadic nature of the gypsy and traveller community, MVDC would welcome ongoing discussion about emerging options to address this strategic issue.</p>		
<p>we don't want a site in or near Horley</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p>	<p>No change.</p>

<p>We assume that consideration will be given to locating a travellers' site in the urban extension as it should be possible to identify a site which is sustainable and does not harm the surrounding landscape and amenities of local residents.</p>	<p>Local planning authorities are required by national planning policy to assess need for Traveller and Travelling Showpeople's accommodation. They are required to demonstrate a supply of available land for five years, and to identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10. It has therefore been necessary for us to take a wide range of approaches, considering different types of sites around the borough - in a variety of locations - for suitability, as well as potential sustainable urban extension sites, to meet our immediate and more long-term need.</p>	<p>No change.</p>
<p>There should not be targets.</p>	<p>The Council's adopted Core Strategy sets out in Policy CS16 that the DMP will identify a local target for provision of sites. This is in line with national planning policy which requires Local planning authorities to assess the level of need in their areas and to seek to accommodate this.</p>	<p>No change.</p>
<p>Use out of town, more rural areas to site these extensive camps. Gypsy and Traveller sites are best placed in rural areas as occupants often have lots of vehicles to accommodate also.</p>	<p>Local planning authorities are required by national planning policy to assess the need for accommodation of gypsies and Travellers within the borough and to identify suitable accommodation sites. We have assessed a variety of sites across the borough for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This assessment took into account the need for suitable access to sites.</p>	<p>No change.</p>
<p>They have to have somewhere to live</p>	<p>Comment is noted</p>	<p>No change.</p>

<p>2nd point We support authorisation of currently unauthorised sites where they meet the Council requirements on accessibility, appearance and there are no adverse affects on the surrounding community. We do not consider that, if the location is acceptable, this option should be dismissed on the grounds that it sets a precedent.</p> <p>3rd point We welcome limited extensions of existing sites where there will be no impact on the surrounding community or surrounding area.</p> <p>5th point We support provision as part of urban extensions as the sites can be properly planned with good access, screening and limited impact on the surrounding population.</p>	<p>Comments are noted</p>	<p>No change.</p>
<p>1st and 4th points We feel it is unlikely that sites will be found in the urban area and we are strongly against new sites in the Green Belt.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. The assessment of sites for Traveller pitches and Travelling Showpeople's plots has considered sites from various locations across the borough, including countryside locations. Assessment of sites follows a process of ruling sites out based on various constraints within the borough, and analysis of sites against set criteria, as well as consideration of site availability and deliverability. The Core Strategy sets out that in the allocation of sites a sequential test should be applied, placing urban sites before those in the countryside, with those in the Green Belt being a last resort. However, due to the range of issues involved in searching for sites, it has not been possible to rule out the use of sites in</p>	<p>No change.</p>

	<p>the Green Belt in this case. Where sites are Green Belt, they have been assessed against the purposes of the Green Belt and ruled out as appropriate.</p> <p>National policy states the following:</p> <p>Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the planmaking process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.</p>	
<p>Please do not invest money in providing Traveller sites. The money would be better spent on investing in the people and places that give back to the local community</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. However in this borough these are not publicly provided or funded sites; they are privately owned sites.</p>	<p>No change.</p>
<p>As long as they pay for the upkeep, rubbish disposal, rectification of any damage caused etc then yes. Deposit in advance just the same as rental of any property/land</p>	<p>However these are not publicly provided or funded sites; they are privately purchased and would require planning permission. Planning permissions can contain conditions, and non-compliance with the conditions can lead to enforcement action at sites in the same way as for the rest of society</p>	<p>No change.</p>
<p>Caracva Spirit of Caravan sites Act of 1968</p>	<p>Comment is noted. The approach to Travellers is in line with</p>	<p>No change.</p>

(now alas repealed)should be reseptced	current national policy, Planning policy for Traveller Sites 2015	
GTT1. I support a sequential approach, including consideration of Green Belt sites if no suitable non-GB sites can be found. This is a necessary area of social provision that has for too long not been met in this Borough.	Comment is noted - a sequential approach has been taken	No change.
Only if it is safe for everyone concerned, particularly travelling families and children	We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.	No change.
Do not support. People should live in houses. What sites? You plan to take green fields for fairground personnel? There are laws to protect our land. We need land to grow food. That itself helps tackle carbon footprints	Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. The assessment of sites for Traveller pitches and Travelling Showpeople's plots has considered sites from various locations across the borough, including Green Belt locations. Assessment of sites follows a process of ruling sites out based on various constraints within the borough, and analysis of sites against set criteria, as well as consideration of site availability and deliverabiliy. The Core Strategy sets out that in the allocation of sites a sequential test should be applied, placing urban sites before those in the countryside, with those in the Green Belt being a last resort. However, due to the range of issues involved in searching for sites, it has not been possible to rule out the use of sites in the Green Belt in this case. Where sites are Green Belt, they have been assessed against the purposes of the Green Belt	No change.

	<p>and ruled out as appropriate.</p> <p>National policy states the following:</p> <p>Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the planmaking process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.</p>	
<p>At this stage, the Council welcome the examination of need against the previous and current definition and consider planning for need should be based on both definitions. The Council believe that the allocation of sites should happen at the earliest opportunity and a clear programme set out to avoid creating pressure of unauthorised encampments in the borough and neighbouring areas. Finally, the Council welcome the intention to make provision for a five year supply of deliverable sites, but in the context of national planning policy suggest that a ten year supply should at least be identified that includes developable sites.</p>	<p>Comments are noted. Interviews with those who don't meet the definition and our knowledge from planning applications/enforcement cases for those who were not able to be interviewed indicates that they are all ethnic gypsies. Having sought legal advice, we are seeking to identify sites to accommodate all our need, even where they do not meet the planning definition, to ensure compliance with the Equality Act 2010.</p> <p>A clear and extensive call for traveller sites has been carried out and the following sources have been explored:</p> <ul style="list-style-type: none"> <li>- Existing traveller sites (authorised and unauthorised)</li> <li>- Sites that have been promoted for housing</li> <li>- Sites with unimplemented permissions for housing or traveller accommodation, or where permission has been refused but reasons have the potential to be overcome (eg design/access/mitigation)</li> <li>- Sites suggested by the traveller community</li> </ul>	<p>No change.</p>

- Sites suggested through the DMP Regulation 18 consultation
- Council owned land and land in other public sector ownership
- Empty or derelict land or land which is under-utilised

Sites will be allocated through DMP policy, with specific sites for the shorter term, and broader locations for the longer term.

In terms of unauthorised encampments and the need for a transit site, our recent GTAA 2017 noted that the 2013 GTAA recommended that there was not any need for the Council to consider transit provision due to very low numbers of unauthorised encampments. Information obtained during the stakeholder interviews and data in the Traveller Caravan Count confirm that there are still very low numbers of encampments and that there are effective processes already in place to deal with them. As such it is recommended that the Council should continue using a management approach to dealing with encampments as opposed to an infrastructure approach. It should also be noted that there is the possibility that changes to PPTS in 2015 could result in increased levels of travelling and levels of unauthorised encampments should be continually monitored whilst the changes associated with the PPTS (2015) develop.

<p>I think this is theoretically enlightened but worry that these communities become Ghettos. Green Lane in Outwood is a place people are afraid of. I do not like the idea of lumping Gypsy and traveller sites together. Several small sites would be more conducive to tolerance and responsible behaviours. Ghettos drive weak elements together.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. The Gypsy and Traveller Accommodation Assessment 2017 identified additional need for sites.</p> <p>We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p> <p>Travellers do incorporate travelling as a large part of their lives, but also need permanent bases, in particular when children are in education or there are health needs within the family. Anti-social behaviour should not be tolerated, and be dealt with as for all other members of society, through the usual and correct policing, legal, and community processes. Where there is breach of planning conditions on a site, enforcement action will be taken to rectify this.</p>	<p>No change.</p>
<p>I hope this means engage in a dialogue with these communities to find out what they would like rather than try and guess on their behalf</p>	<p>As part of the Gypsy and Traveller Accommodation Assessment (GTAA) 2017, travellers were interviewed regarding their needs for sites due to overcrowding, natural growth etc, and this has informed the numbers of pitches and plots required. Assessment of sites has been informed by a range of criteria taking account of best practice design and borough context.</p>	<p>No change.</p>



<p>whole purpose of travelling is they do just that. Hard to manage and maintain and end up with a ghetto. Ok to designate a field of use, which they can use for a set period and have to move on, also leave in state they found it. For it to become a permanent site you may as well build local authority housing!! Given they don't pay tax and earn a fortune in cash - sure they will not contribute to that!!!</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. The Gypsy and Traveller Accommodation Assessment 2017 identified additional need for sites.</p> <p>We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence. Travellers do incorporate travelling as a large part of their lives, but also need permanent bases, in particular when children are in education or there are health needs within the family. Given this they are required to pay Council tax. There are a number of existing private Traveller sites in the borough, there are no currently Council run sites and there are no Council run sites proposed.</p> <p>Anti-social behaviour should not be tolerated, and be dealt with as for all other members of society, through the usual and correct policing, legal, and community processes. Where there is breach of planning conditions on a site, enforcement action will be taken to rectify this.</p>	<p>No change.</p>
<p>Strongly supported. It is a matter of great regret that the Borough has failed for over 30 years to provide any such sites.</p>	<p>Comment is noted</p>	<p>No change.</p>

<p>This is fine provided these communities are contributing (either financially or practically) towards the upkeep and maintenance of said areas. I don't see why the local population should provide facilities for those who have no interest in contributing to the local community themselves. (with the exception of protecting the vulnerable children of such families).</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. The Gypsy and Traveller Accommodation Assessment 2017 identified additional need for sites.</p> <p>We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p> <p>Travellers do incorporate travelling as a large part of their lives, but also need permanent bases, in particular when children are in education or there are health needs within the family. Given this they are required to pay Council tax. There are a number of existing private Traveller sites in the borough, there are no currently Council run sites and there are no Council run sites proposed.</p>	<p>No change.</p>
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<p>The new definitions are not immediately apparent. Their individual needs need to be known in order to comment sensibly. PPTS 2015 - A clear distinction is made between Travelling Show People and Gypsies and Travellers. It is clear that Travelling Show People operate a business that requires storage of its business goods, albeit seasonally. What is not clear is why this type of business should be given special treatment. As far as family accommodation out of season is concerned they should be expected to own or to rent houses within the community there being no special requirements for these people.</p> <p>In the case of Gypsies and Travellers there is a distinction that should be made between those that are truly mobile, remaining in one place for a few days, and those that have decided to remain stationary for several years for educational or family reasons. The former are nomads who have chosen a different lifestyle. The community should provide a number of licensed sites which are purely residential and equipped with necessary services. Those that have chosen to remain for long periods are not pursuing a nomadic lifestyle and need no exceptional treatment.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. It is not for the Council to comment on Government policy.</p> <p>The Equalities Act 2010 requires Local Planning Authorities to have due regard to those protected by this act, including by way of culturally appropriate accommodation for Irish Travellers and Romany Gypsies who are specifically protected under the Act. From the Gypsy and Traveller Accommodation Assessment 2017 we understand that our ethnic traveller population (those who are not travelling showpeople) all identify as Irish Travellers and as such as protected under the Equalities Act. We have taken legal advice which confirmed that we should also consider their needs, even where they do not fall under the definition. The proposed policy will state that occupancy of the identified sites will be restricted to the travelling community who meet the Traveller definition as set out in current national policy or who identify as Travellers in line with the stipulations in the Equality Act 2010.</p>	<p>No change.</p>
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<p>To ensure that RBBC makes every effort to meet their needs, and to establish whether RBBC are able to assist others in meeting needs, we would recommend that a clear and extensive call for traveller sites is carried out. TDC have previously carried out 'Call for Sites' exercises for traveller sites which have not provided sufficient site options to meet our identified need. TDC continue to explore the reasonable alternatives in terms of meeting traveller needs but given the local constraints coupled with a lack of available sites, TDC would welcome assistance from RBBC in meeting future needs.</p>	<p>A call for sites was carried out as part of the assessment of sites for Travellers and Travelling Showpeople in RBBC, and we have assessed a variety of other sites in addition, across the borough.</p> <p>We acknowledge the need to take a strategic view across borders with neighbouring authorities and RBBC will continue to maintain a conversation with TDC in line with the Duty to Co-operate. We would note however that we have not been able to identify any extra capacity so would not be able to accommodate any neighbouring Traveller needs.</p>	<p>No change.</p>
<p>the potential sources of traveller accommodation set out in the table on page 99 provide a sensible approach to identifying potential land to meet identified needs.</p>	<p>Comment is noted</p>	<p>No change.</p>
<p>We acknowledge that this is an obligation that cannot be ignored. The order of preferences we would suggest is:</p> <ul style="list-style-type: none"> <li>(1) New sites in urban areas;</li> <li>(2) Authorisation of existing unauthorised sites where they meet the requirements and there are no adverse affects on the area;</li> <li>(3) Extension to existing sites where there will be limited additional impact on the surrounding area;</li> <li>(4) Provision as part of urban extensions</li> <li>(5) New sites in the countryside subject to a thorough review.</li> </ul>	<p>Comment is noted - a sequential approach has been taken, informed by Core Strategy policy CS16. Details can be found in the Gypsy and Traveller Strategic Housing Land Assessment (GT SHLAA) 2017 available on the Council website.</p>	<p>No change.</p>

<p>GTT1 - We are pleased to note that Reigate and Banstead has an up to date Gypsy and Traveller Accommodation Assessment (2016). However we do have reservations about the low response rate to the GTAA interviews and the resultant impact on the findings. We note that the previous GTAA identified a need for 52 pitches and 13 plots compared to the 14 pitches (plus potential 9 additional pitches from unknown households and 9 that do not meet the new definition) and 7 additional plots identified in the current GTAA. We are concerned that figures may not reflect the true level of need for traveller accommodation in your borough and there is a danger that you will under plan, resulting in a large unmet need across Surrey. We are interested to find out what approach you will take to planning and providing accommodation for those that don't meet the new definition of traveller, but whom are ethnic travellers (particularly those with an aversion to bricks and mortar). Given the high level of traveller accommodation need that exists within Surrey we consider that all councils should maximise opportunities to meet their own need by identifying suitable and deliverable traveller sites. In our opinion the table (on page 99) setting out the potential sources of traveller accommodation supply is thorough, but we seek clarification on whether 'new sites within the countryside' would include Green Belt land as we note you have recently</p>	<p>The response rate is consistent with levels of response that ORS have found across the country. Many travellers are still cautious about being interviewed - especially given some of the scare-mongering about the implications of the new definition. ORS are confident that by including an assessment of need for households where an interview was not completed it is robust and provides sufficient information to allow the council to plan ahead.</p> <p>In addition, this assessment used a significantly lower rate for new household formation (3.00% was used for the previous study which would have significantly overestimated need).</p> <p>Interviews with those who don't meet the definition and our knowledge from planning applications/enforcement cases for those who were not able to be interviewed indicates that they are all ethnic gypsies. Having sought legal advice, we are seeking to identify sites to accommodate all our need, even where they do not meet the planning definition, to ensure compliance with the Equalities Act 2010.</p> <p>Our site search did indeed include Council owned land, the following is a list of the sources that were used which included any land put forward or identified with potential within urban land, rural surrounds of Horley or the Green Belt.</p> <ul style="list-style-type: none"> <li>- Existing traveller sites (authorised and unauthorised)</li> <li>- Sites that have been promoted for housing</li> <li>- Sites with unimplemented permissions for housing or traveller accommodation, or where permission has been refused but reasons have the potential to be overcome (eg design/access/mitigation)</li> </ul>	<p>No change.</p>
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<p>published a Green Belt Review report. Would an additional option be to include provision on Council owned land?</p>	<ul style="list-style-type: none"> <li>- Sites suggested by the traveller community</li> <li>- Sites suggested through the DMP Regulation 18 consultation</li> <li>- Council owned land and land in other public sector ownership</li> <li>- Empty or derelict land or land which is under-utilised</li> </ul> <p>With regard to the Green Belt, we have ruled out some sites against the purposes of the Green Belt we have not ruled this out as a constraint, as all suitable and available sites are in the Green Belt for the shorter-term.</p>	
<p>There are sites which they don't use</p>	<p>All the traveller sites in the borough are privately owned, it is up to them how they occupy their land. However the assessment of need only takes into account need for additional pitches/plots rather than preference</p>	<p>No change.</p>
<p>Would need more information on the scale of numbers to be catered for</p>	<p>The assessed need for pitches and plots is set out in the Council's Gypsy and Traveller Accommodation Assessment (GTAA), 2016.</p>	<p>No change.</p>
<p>Complex issue, people have to sleep somewhere and be supported to do so safely whilst not negatively impacting neighbours or local amenities</p> <p>they need safe places to stay but also I want to make sure their presence in the area doesn't impact the safety of the community or access to the facilities.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p>	<p>No change.</p>

<p>My first thought was to object but as i understand that every council has to provide this then there is little choice. A shame though that there is little scope for eviction due to anti social behaviour.</p>	<p>Anti-social behaviour won't be tolerated, and be dealt with as for all other members of society, through the usual and correct policing, legal, and community processes. Where there is breach of planning conditions on a site, enforcement action will be taken to rectify this.</p>	<p>No change.</p>
<p>Romany Gypsies will not want to stay in one place. Travelling show people will not want to stay in one place. We are left with what I used to call Irish Tinkers. I expect there are now other nationalities involved. My true belief is that this crowded borough there is actually nowhere that is acceptable for a Gypsy encampment.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. Travellers do incorporate travelling as a large part of their lives, but also need permanent bases, in particular when children are in education or there are health needs within the family. The Gypsy and Traveller Accommodation Assessment 2017 identified additional need for sites.</p> <p>We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p>	<p>No change.</p>
<p>Regardless of provision there remains a non-willingness to act in neighbourly beneficial ways by these communities.</p>	<p>Whilst sites will be allocated in the Development Management Plan, these will still be subject to detailed planning permission, which includes planning conditions where necessary and appropriate. These conditions will be enforced through the Council's enforcement action.</p> <p>Anti-social behaviour should not be tolerated, and be dealt with as for all other members of society, through the usual and correct policing, legal, and community processes.</p>	<p>No change.</p>

Too vague. Need more info about this	Assessment of need for gypsies and Travellers is set out in the Gypsy and Traveller Accommodation Assessment (GTAA) 2017, and the assessment of sites for allocation is set out in the Gypsy and Traveller Strategic Housing Land Assessment (GT SHLAA) 2017 available on the Council website. Proposed policy GTT1 identifies proposed sites for allocation. There will be opportunity for further comment during the consultation on the Regulation 19 DMP document consultation.	No change.
It will be a brave Councillor who accepts a new Gypsy encampment in his/her ward.	Local planning authorities are required by national planning policy to assess the need for accommodation of gypsies and Travellers within the borough and to identify suitable accommodation sites. Assessment of sites follows a process of ruling sites out based on various constraints within the borough, and analysis of sites against set criteria, as well as consideration of site availability and deliverability.	No change.
There are existing sites that could be developed which would provide sustainable growth if better managed in consultation with those that use them	Local planning authorities are required by national planning policy to assess need for Traveller accommodation and to seek to meet this need. Some unauthorised sites are being suggested as site allocations, however the approach was not to automatically make all unauthorised sites authorised. All proposed sites have been through an assessment process which considered if sites were suitable, available and achievable and then assessed them against the purposes of the Green Belt if they were within it. There are also some small scale extension to existing sites proposed, although this has been limited as we not want sites to become too large, affecting the balance between the travelling community and local settled communities.	No change.
Sadly these people stir up such negative connotations	Comment is noted	No change.



<p>Not sure it is fair to have specific sites. This would be very contentious for those local to any sites identified</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p>	<p>No change.</p>
<p>We already have gypsy's occupying the houses in <b>Sandcross Lane and Stockton Road</b>. We have their dumped vehicles and live stock in th field next to the garden centre. Why help them out even more when they don't look after what they've have</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need.</p>	<p>No change.</p>
<p>The Council identifies potential sources of Traveller accommodation supply on page 99 of the DMP. Whilst not expressed in this way, we note that the order of these sources of supply closely reflects the sequential order for the allocation and delivery of land for development as set out in Policy CS4 of the adopted Core Strategy. 4.2 It is therefore necessary for the Council to explore all opportunities within the urban areas and within the countryside before any consideration is given to provision being made as part of sustainable urban extensions. 4.3 The Council should also take into account</p>	<p>Local planning authorities are required by national planning policy to assess need for Traveller and Travelling Showpeople's accommodation. They are required to demonstrate a supply of available land for five years, and to identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10. The site assessment process has been done in line with policy CS16 of the Core Strategy and is outlined in the evidence paper available on the Council website. Whilst we have been able to identify a number of sites for shorter-term need, there will still be future need to accomodate, which may necessitate the consideration of sites within sustainable urban extentions. The viability of this approach has been considered.</p>	<p>No change.</p>

<p>the likely impact of allocating Traveller pitches within sustainable urban extensions on the viability of development. This should take account of any abnormal costs of developing sites and infrastructure requirements.</p>		
<p>Where sites are already known for travellers can't these be set up as proper sites?</p>	<p>We have considered sites that are currently unauthorised, and these have been assessed as part of our sites assessment.</p>	<p>No change.</p>
<p>Gypsy, Traveller Show people should be encouraged to filter into the local community, no special sites or needs to be provided by the rate payers. Why should they be treated any different to the rest of the community and at cost to the local people. Developing new and existing sites is not the answer when the development is a burden on the local community tax and rate payers.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. The Gypsy and Traveller Accommodation Assessment 2017 identified additional need for sites.</p> <p>We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p> <p>Travellers do incorporate travelling as a large part of their lives, but also need permanent bases, in particular when children are in education or there are health needs within the family. Given this they are required to pay Council tax. There are a number of existing private Traveller sites in the borough, there are no currently Council run sites and there</p>	<p>No change.</p>

	are no Council run sites proposed.	
Isn't there already a site in Merstham?	Information on the existing traveller context can be found in the Gypsy and Traveller Accommodation Assessment 2017	No change.
Policy is irrelevant - We have travellers sites regardless	Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need.	No change.
The estimates of gypsy and traveller numbers suggested in the evidence base should be consulted with the Surrey Gypsy Traveller Communities Forum ( <a href="http://www.sgtcf.uk/home/">http://www.sgtcf.uk/home/</a> ) and the organisation Friends, Families and Travellers ( <a href="http://www.gypsy-traveller.org">www.gypsy-traveller.org</a> ), and also verified against statistics of the number of gypsy and traveller children in education in Surrey. In this way the provision of housing by Reigate & Banstead can be closely coordinated with County Council and health services.	Communication with these two bodies was undertaken in preparation of the GTAA, alongside SCC/Brighter futures. The number in the evidence base are need numbers due to instances such as overcrowding or natural growth, the number of traveller children in education in Surrey will not qualify these numbers.	No change.
The provision of such sites is a necessity and it is much better that it is done within the boundaries of the law rather than left to the initiative of individuals - Controls should be strict and law enforcement made a priority	Comment is noted. When planning conditions are not complied with, enforcement action is taken. Other anti-social or criminal behaviour is the responsibility of the appropriate law enforcement service	No change.

<p>We have managed so far without these so why Re we having these exposed on us now. We do t want travellers nor extra burial sites.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need.</p>	<p>No change.</p>
<p>The Parish Council has serious doubts about the robustness of the assessment of the number of pitches proposed as a result of the Gypsy and Traveller Accommodation Assessment (2016). We regard this as flawed because:</p> <ol style="list-style-type: none"> <li>1. The Assessment is largely based on interviews with Travellers, not normally a robust analytical process, but one which is likely to overestimate the need</li> <li>2. The views of Councillors and Parish Councils have not been accepted nor apparently valued</li> <li>3. No account has been taken of the impact on the local community of siting a gypsy encampment anywhere</li> <li>4. The almost complete absence of unlawful sites and incursions suggests no great underlying need</li> <li>5. The provision is heavily front-loaded into the earlier years of the Plan for no apparent reason</li> <li>6. No account has been taken of sites very close to or indeed abutting the Borough boundary or their impact on services here.</li> <li>7. As regards showmen, the 'need' ignores the</li> </ol>	<p>Opinion Research Services were commissioned to carry out the needs assessment and they have done 100s of interviews with Travellers. As such, they have continuously refined their questions and the Interviews with Travellers were undertaken by experienced interviewers. The questions have been designed to understand need rather than preference, for example in relation to household formation rates and the ages of children.</p> <p>Impacts upon local communities have been covered as part of the assessment of sites for suitability which is available on the Council's website.</p> <p>The issue of incursions is something which would be accommodated by a transit site, this is covered in the Gypsy and Traveller Accommodation Assessment and essentially say that whilst there are some incursions currently there are not enough to justify a site specifically to accommodate this movement but this should be monitored. This is different from need for more settled locations to accommodate those Travellers who live in the borough.</p> <p>The provision of sites is intended to match when those sites will be needed, spread across 5 year brackets. This is also set out in the Gypsy and Traveller Accommodation</p>	<p>No change.</p>

<p>number of plots on the existing site occupied by non-showmen</p> <p>The study lacks the objectivity normally associated with planning documents. The Parish Council believes the 'need' for pitches in the policy is unrealistically high, and that the Borough should commission a study from an alternative source which would avoid the errors above in order to check the figures. The proposed high numbers would be disastrous if repeated in the final plan as they would make it almost impossible for the Council to refuse any gypsy site proposal.</p> <p>In any case, any Traveller or Showman sites should be located well distant from existing sites, to prevent over-concentration in one area, and there should be an absolute ban on this type of development in the Green Belt. We note the showmen's site is referred to as being 'near Horley'. It is of course in Axes Lane Salfords, within 2 km of the travellers' site in Green Lane, Outwood, immediately on the Borough boundary.</p>	<p>Assessment.</p> <p>Whilst the location of sites in other boroughs is important with regard to the location of new sites and consideration of amenities, it does not affect the assessment of need for this borough. It should be noted that this assessment is concerned with outstanding need, and not where current Traveller or Travelling Showpeople are located. We are aware of the need to ensure peaceful coexistence between travelling communities themselves, and between them and the settled local communities, and this is something that has been considered at the site assessment stage.</p> <p>Investigation of those living on the current showpersons site has been undertaken to ensure there are no non-showmen living on the site.</p> <p>With regard to the Green Belt, we have considered a variety of sites in different locations across the borough, and ruled many out against various constraints, including designations such as AONB, and against set criteria, as well availability and deliverability. However, without the assessment of Green Belt sites as part of this we would be unable to accommodate the level of need required, as required by government guidance. We therefore assessed Green Belt sites carefully against the purposes of the Green Belt for acceptability.</p>	
<p>An essential part of the process of assessing the potential sites for accommodation needs of gypsy and travellers is the consideration of the following issues:</p> <ul style="list-style-type: none"> <li>• Correctly apply the sequential test, steering</li> </ul>	<p>Assessment criteria also take account of potential for flooding, including functional floodplain status.</p>	<p>Reference to flooding as appropriate.</p>

<p>new development to the lowest flood risk zone appropriate to the proposed use, and the exception test where necessary.</p> <ul style="list-style-type: none"> <li>• Reduce flood risk through making space for water</li> </ul>		
<p>The need for sites will be reduced when immigration is more strongly controlled after Brexit.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. The outcomes of the UK's departure from the EU currently remains very unclear and is unlikely to be understood in the near future. We cannot make assumptions, we have to use an evidence base and the current level need has been identified through the Gypsy and Traveller Accommodation Assessment 2017.</p>	<p>No change.</p>
<p>We do not understand why provision is being made for travellers who do not meet the new definition.</p>	<p>The Equalities Act 2010 requires Local Planning Authorities to have due regard to those protected by this act, including by way of culturally appropriate accommodation for Irish Travellers and Romany Gypsies who are specifically protected under the Act. From the Gypsy and Traveller Accommodation Assessment 2017 we understand that our ethnic traveller population (those who are not travelling showpeople) all identify as Irish Travellers and as such as protected under the Equalities Act. We have taken legal advice which confirmed that we should also consider their needs, even where they do not fall under the definition. The proposed policy will state that occupancy of the identified sites will be restricted to the travelling community who meet the Traveller definition as set out in current national policy or who identify as Travellers in line with the stipulations in the Equality Act 2010.</p>	<p>No change.</p>

<p>Existing Gypsy site(s) are adequate and no further provision required. It seems as if the area already has more provision for gypsies and travellers than anywhere else in the country.</p>	<p>All Local planning authorities are required by national planning policy to assess the accommodation needs of gypsies and Travellers within their area and seek to identify suitable sites to meet this need. The Gypsy and Traveller Accommodation Assessment 2017 identified additional need for sites.</p>	<p>No change.</p>
<p>This would go against the CS objective of 'Reigate &amp; Banstead will be one of the most desirable and attractive areas in the region'. Additional traveller sites will <b>depreciate the area</b> and only lead to a rise in crime , fly tipping , and devalue what is a sought after area.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. Proposed sites would still have to submit a planning application so details of the site design, access etc would be considered and appropriate conditions attached.</p>	<p>No change.</p>
<p>This should not be provided at the expense of local residents, when travellers do not contribute to the local area. Further areas for these people are unnecessary and a waste of resources. Travellers are often threatening and a drain on services.</p> <p>Sites for travellers is not a priority over the housing and schools crisis in the borough</p> <p>These should be accorded a low priority in my view. More important is to consider the lives of those still living and the permanent residents of the community (especially Redhill where I have</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. The Gypsy and Traveller Accommodation Assessment 2017 identified additional need for sites. This is not something which takes priority over anything else in the DMP.</p> <p>We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful</p>	<p>No change.</p>

<p>lived for almost 50 years).</p>	<p>coexistence.</p> <p>Travellers do incorporate travelling as a large part of their lives, but also need permanent bases, in particular when children are in education or there are health needs within the family. Given this they are required to pay Council tax. There are a number of existing private Traveller sites in the borough, there are no currently Council run sites and there are no Council run sites proposed.</p> <p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	
<p>What about the field down Holly Lane beyond the farm and towards the car park.</p>	<p>Comment is noted - it is not possible to give a detailed response as it is not clear which land this is referring to. However, that area appears to be constrained by absolute constraints such as common land, area of outstanding natural beauty and ancient woodland</p>	<p>No change.</p>



<p>GTT1 - Comments are sought on the table for potential sources of Traveller accommodation supply. Re 'authorisation of currently unauthorised sites' the word 'currently' should be defined to prevent additional unauthorised sites appearing in number. Each should meet the Council's requirements in respect of accessibility, appearance etc.</p>	<p>All of the current unauthorised sites are located in the Green Belt. National policy states that local planning authorities should only amend Green Belt boundaries as part of a Local Plan review, and to ensure that these do not need to be amended after the plan period (which for RBBC is 2012 - 2027). As such, this process only allows for what are termed as "current" unauthorised sites at only this point in time. Whilst some unauthorised sites are being suggested as site allocations, the approach was not to automatically make all unauthorised sites authorised. All sites under consideration have been through an assessment process which considered if sites were suitable, available and achievable and then assessed them against the purposes of the Green Belt if they were within it. The policy also makes it clear that the site allocations set out in this plan are insets within the Green Belt and are specifically allocated as Traveller sites only. Occupancy will be restricted to the travelling community who meet the Traveller definition as set out in current national policy or who identify as Travellers in line with the stipulations in the Equality Act 2010.</p>	<p>No change.</p>
<p>Maybe the existing site near Woodmansterne would be suitable for enlarging if this is really necessary, or towards Wallington which is perhaps more suitable.</p>	<p>Comment is noted - the Traveller site allocation document provides further information on the site identification process</p>	<p>No change.</p>
<p>This is scaremongering comment, as in 'let us do what we want, or we'll allow traveller communities to take the space'.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need.</p>	<p>No change.</p>

<p>The introduction of Gypsy and Traveller Sites on the Fisher/Bayhome Farm floodplain would be inappropriate.</p>	<p>This is not being proposed</p>	<p>No change.</p>
<p>If this means having a place where travellers can temporarily stop for a few weeks every year or so while travelling I agree, if this means permanent sites all year round I don't agree.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need. Travellers do incorporate travelling as a large part of their lives, but also need permanent bases, in particular when children are in education or there are health needs within the family. The Gypsy and Traveller Accommodation Assessment 2017 identified additional need for sites.</p> <p>We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration/peaceful coexistence.</p>	<p>No change.</p>
<p>Gypsy sites should not be near homes or other property</p>	<p>We have assessed a variety of sites for their suitability as Traveller sites and, as part of this, we have applied various criteria taking account of the amenity of the Travellers potentially living there, and the local settled communities. This has also looked at the potential for integration or peaceful coexistence.</p>	<p>No change.</p>
<p>These people are part of our culture and heritage - cherish them; protect them. This is important to prevent Traveller communities feeling unable to find places to park.</p>	<p>Comment is noted</p>	<p>No change.</p>

<p>Fly tipping will become prevalent.</p>	<p>Local planning authorities are required by national planning policy to assess the accommodation needs of all residents in their areas. This includes the need for sites for Travellers within the borough and requires local planning authorities to seek to meet this need.</p>	<p>No change.</p>
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<p><b>INFRASTRUCTURE</b></p>		
<p>Assume PS3 and PS4 are generic sweeping questions. Nevertheless "and sustainability principles" should be deleted unless what is meant here is different from the concepts in previous sections. If so please define 'sustainability principles'.</p>	<p>We acknowledge that "sustainability principles" are not defined, despite references to it in the objectives.</p>	<p><b>A definition of "sustainable development" has been added to the Glossary</b></p>
<p>PS4 - Make the developers pay for this. It's a direct cost of their development and I don't see why the taxpayer should subsidise their profit</p>	<p>Developers will pay towards the infrastructure needed to support their developments (through the Community Infrastructure Levy and in some cases also planning obligations). Some infrastructure is funded by central government (such as through the Department of Transport and the Education Funding Agency).</p>	<p>No change</p>

<p>PS4 - We note the range of policy mechanisms proposed under INF1 and are generally supportive of the Council's approach. However, we do not consider it necessary for a development brief to be required. Gallagher Estates is committed to engaging positively, as part of the DMP's preparation and any site specific policy, and through early preapplication discussions with the Council and "other consenting bodies" to inform the detailed design, the approach to infrastructure provision and any other mitigation which could be required.</p> <p>4.36 In this regard, we would particularly welcome the opportunity, as part of the Council's 'Regulation 19' proposed submission DMP being prepared, to meet with the Council and relevant service providers to assist in the assessment of the infrastructure requirements associated with a site specific allocation policy for the Former Copyhold Works (ERM2 and ERM3).</p>	<p>The list of funding and delivery mechanisms is intended to explain the options open to us. Preparation of site briefs will not be required for all allocated sites. This text will not all be included in the proposed plan for submission.</p>	<p>This wording has been changed in the proposed submission plan</p>
<p>Drop kerbs to existing tenants homes so it frees up the roads and pathway and stops vehicle from getting damaged.</p>	<p>Existing residents can apply to have the kerb in front of their house dropped to allow off-street vehicle access</p>	<p>No change</p>
<p>It is not possible to resolve all existing infrastructure deficits and quality issues before allowing further development. We are doing all we can in working with our partners who are responsible for the road local and strategic network to improve its functioning.</p>	<p>It is not possible to resolve all existing infrastructure deficits and quality issues before allowing further development. We are working with our partners who are responsible for the road local and strategic network to improve its functioning.</p>	<p>No change</p>
<p>No development at all should be undertaken until and unless there is full commitment and financial assurances with regard to more GP services, hospitals, schools, public transport. The current Redhill and Reigate road system is clearly overloaded, school places are difficult, and the East Surrey Hospital</p>	<p>All development will be required to either provide, to fund directly, or to contribute to a wider infrastructure funding resource (through the the Community Infrastructure Levy), depending on the scale and</p>	<p><b>Policy INF1 includes wording on considering development</b></p>

<p>handles huge numbers of patients and visitors. Much thought needs giving to all these before the introduction of more housing adds to the already heavy burdens placed on all services.</p>	<p>impacts of the developments. The requirement to provide or fund infrastructure will be included in Policy INF1, and in the sites allocation policies where infrastructure is needed to support a development.</p>	<p><b>proposals which do not provide adequate infrastructure</b></p>
<p>Whatever new development takes place it is most important that all infrastructure is in place to start with. It should not be assumed that the developers will provide as a planning gain.</p>	<p>All development will be required to either provide, to fund directly, or to contribute to a wider infrastructure funding resource (through the the Community Infrastructure Levy), depending on the scale and impacts of the developments. The requirement to provide or fund infrastructure will be included in Policy INF1, and in the sites allocation policies where infrastructure is needed to support a development.</p>	<p><b>Policy INF1 includes wording on considering development proposals which do not provide adequate infrastructure</b></p>
<p>Your infrastructure plans are woefully inadequate. You have secured sites for housing and yet have nothing in place for schools that will service these people. If you think only professionals will move into the area you are very mistaken. Over the last 5 years things have gotten out of control here - The Dr surgeries have ridiculously long waits, the hospital is groaning under the pressure, the schools have ludicrously long wait lists and people are travelling all over the place just to get their kid to a school as local places are massively over subscribed. In 5 years the area will not be desirable if you over populate it without adequate infrastructure</p>	<p>All development will be required to either provide, to fund directly, or to contribute to a wider infrastructure funding resource (through the the Community Infrastructure Levy), depending on the scale and impacts of the developments. The requirement to provide or fund infrastructure will be included in Policy INF1, and in the sites allocation policies where infrastructure is needed to support a development.</p>	<p>No change</p>

<p>Access is never planned for, not long term access. A217 and A23 are too congested and once more houses are developed it becomes similar to living in Croydon.</p> <p>Infrastructure and services are never improved enough with the volume of people that are being planned for. ROADS Schools Doctors Hospitals Police, Public transport</p> <p>Developments should be around existing large towns such as Guildford or Crawley that have services and room for grown.</p> <p>How are the tax payers living in these houses going to get to work? Is the key question that should be asked. Buses are slow and train stations are conjested and not walking distance so people will have to drive.</p> <p>As I have said throughout manage your infrastructure plans better - it is all too easy to find space for 25 homes here, 20 homes there but the people that then move into these homes are adding to an already bulging population. There are not enough school places, Dr wait lists are ludicrous, the hospital is crazy busy. Stop focusing on getting more people here and start providing for the people that you have crammed in. Your development proposals are pages and pages long for housing - infrastructure is 1 page and your plan is 'consult and liaise'. Appallingly inadequate.</p>	<p>The proposed housing growth will be accompanied by improvements to infrastructure such as the highways network and new infrastructure such as new schools. Details of this infrastructure is set out in the Infrastructure Delivery Plan and Infrastructure Schedule. The DMP sites allocations policies also include land to be allocated for infrastructure.</p>	<p>No change</p>
<p>No new roads are mentioned. New development will severely congest A217 into Reigate (especially South of Reigate- 2000 homes not mentioned here)</p>	<p>Our transport modelling of the proposed allocation sites undertaken by SCC highlights likely congestion hotspots and any mitigation needed for sites to be allocated for development. This evidence has informed the site allocations</p>	<p>No change</p>
<p>Road infrastructure is poor whilst public transport expensive and shockingly poor</p>	<p>Noted</p>	<p>No change</p>

<p>Traffic congestion is already appalling. What it will be like with thousands of new residents doesn't bear thinking about. Improving Woodhatch junction won't help</p>	<p>Our transport modelling of the proposed allocation sites undertaken by SCC highlights likely congestion hotspots and any mitigation needed for sites to be allocated for development. This evidence has informed the site allocations</p>	<p>No change</p>
<p>Schools - schools in the borough are at bursting point, I am concerned about how many children are shoe horned into these two school and am aware that this is an issue borough wide and how little outside space is available to these individuals within the school environment Our schools are oversubscribed as are dentists, doctors and other essential services, unless a new school is built for instance there is nowhere to currently educate new local families without sending them outside of the borough which is counter intuitive to and environmental plan with the travel involved.</p>	<p>Noted</p>	<p>No change</p>
<p>There is no room on the local roads for more traffic. There is never a good time to drive locally, there are constant traffic jams and the roads are also clogged up with parked cars. Roads which used to be quiet residential roads are becoming rat runs as drivers seek to avoid the main roads. /further tinkering with the 'Angel' crossing will not improve the situation.</p>	<p>Our transport modelling of the proposed allocation sites undertaken by SCC highlights likely congestion hotspots and any mitigation needed for sites to be allocated for development. This evidence has informed the site allocations</p>	<p>No change</p>
<p>Are transport for London and Reigate and Banstead starting some new bus services. People need to get around not just using cars. The 166 bus to Epsom and Croydon only runs once an hour! We have no train infrastructure and no trams. How is building more homes without having confirmed extra services and resources going to help</p>	<p>Noted</p>	<p>No change</p>
<p>Banstead - We do not currently have a NHS dentist and have to travel to and from Epsom hospital on 166 bus. How will the area cope with the increase and how are these plans LINKED</p>	<p>The additional pressure arising from new development and potential solutions has been considered in the Health Needs</p>	<p>No change</p>

<p>to any NHS hospital closures or changing NHS arrangements. I would like to see how the health care is dovetailed into these plans and what PM have said in regard to protection the current population expressed nearest A &amp; E because the more of us here the more we need our local A &amp; E depts.</p>	<p>Technical Paper, June 2016 and the Infrastructure Delivery Plan 2017 which were prepared in support of this plan.</p>	
<p>Our schools are oversubscribed as are dentists, doctors and other essential services, unless a new school is built for instance there is nowhere to currently educate new local families without sending them outside of the borough which is counter intuitive to and environmental plan with the travel involved.</p>	<p>The Education Evidence Paper and the Healthcare Evidence Paper 2016, and Infrastructure Delivery Plan prepared to support the Development Management Plan have considered these issues.</p>	<p>No change</p>
<p>Horley - Horley is fast becoming a commuter hub for the city. The train station cannot cope with rush hour commuters as it only has two exit gates! In addition the train service is awful. If new housing is to be built then serious consideration needs to be given to the supporting infrastructure. The train station is going to be crucial to the long term viability and growth of Horley. If this is not given the required thought and investment then it will fail</p>	<p>A rolling programme of improvements to Horley rail station has been undertaken and no further works are currently planned.</p>	<p>No change</p>
<p>There is already a shortage of school places in the area at both primary &amp; secondary level, and the provision of new places has been slow to catch up. which will have a significant impact on the education of local children. This area is highly desirable for young couples wishing to relocate from london suburbs to somewhere they can commute from but wish to bring up a family. This is certainly noticeable in Merstham.</p>	<p>Surrey County Council has proposals for expanding existing schools with both permanent and temporary expansions to cope with the recent natural population growth. Additionally, several of the proposed allocation sites include proposed allocations for new schools.</p>	<p>No change</p>
<p>Existing infrastructure and many services are at capacity. Where new development is happening the tweaks to the infrastructure and services are probably ticking boxes on some form but failing in practice. Using the new roundabout on the Reigate Road. It's great you're letting a whole load of traffic out onto that road but where is it going? North through Reigate</p>	<p>It is not possible to resolve all existing infrastructure deficits and quality issues before allowing further development. We are working with our partners responsible for the road local and strategic network to improve its functioning, and to ensure that</p>	<p>No change</p>



<p>which is already a standstill most the time or south towards an already overloaded M23 junction?</p>	<p>developers fund access roads (through planning obligations, highways agreements or the Community Infrastructure Levy), and junction improvements to mitigate the impact of their development.</p>	
<p>The title for this is inappropriate. First and foremost infrastructure should be provided to ensure that developments, communities, and the borough as a whole is sustainable. This means infrastructure that meets the needs of communities to deliver a high quality of life for all, within local and global environmental limits. Infrastructure to meet these needs includes aspects such as sufficient schools, doctors, and health centre provision. This type of infrastructure should be prioritised over that envisioned to support growth.</p>	<p>It is not possible to resolve all existing infrastructure deficits and quality issues before allowing further development. We are working with our partners responsible for the road local and strategic network to improve its functioning, and to ensure that developers fund access roads (through planning obligations, highways agreements or the Community Infrastructure Levy), and junction improvements to mitigate the impact of their development.</p>	<p>No change</p>
<p>The road infrastructure is already struggling during peak periods. It is very difficult to get from Merstham to the A23 during the morning, Battlebridge lane is a long queue and school hill is a difficult junction, and from there to access the M25. Many use junction 8 but the roads from Merstham area, Gatton bottom/Rocky Lane are very congested and the junctions do not flow well. These roads are simply not designed for the volume &amp; type of traffic that tries to use them which will only increase with the proposed developments.</p>	<p>Our transport modelling of the proposed allocation sites undertaken by SCC highlights likely congestion hotspots and any mitigation needed for sites to be allocated for development. This evidence has informed the site allocations</p>	<p>No change</p>
<p>I would also like to express my concern about the A217 itself. Traffic, since we moved here in 1981 has grown ever heavier. The road seems to be backed up most mornings and evenings, certainly past the Grammar School Playing fields and seems to be at saturation point during peak times. It is the major artery</p>	<p>Our transport modelling of the proposed allocation sites undertaken by SCC highlights likely congestion hotspots and any mitigation needed for sites to be allocated for development. This evidence</p>	<p>No change</p>

<p>for North/South traffic through Reigate and other than the A23 there is no alternative route. There will be additional traffic when the new village at Westvale Park is completed - 1500 homes(?) - about another 1000+ cars using the A217? The road is just not able to handle these volumes of traffic and if development at Hartswood Nursery and Dovers Farm goes ahead with access directly onto the A217, it is just going to make the A217 a polluted, gridlocked nightmare.</p>	<p>has informed the site allocations</p>	
<p>Traffic (Redhill and Reigate) - The towns of Redhill and Reigate are seriously affected by all the heavy traffic on A25, A23 and A217. Traffic is at grid lock at certain times of the day on the A217, especially if the M23 is closed, also with the new estate going up at "Horley North", approx. 2000 houses which means another 4000 cars to be accommodated. To increase the traffic on any of these roads is likely to throttle the towns and cannot cope with any more increase in population; building of more houses, shops or schools should not happen until traffic congestion has been solved.</p>	<p>Our transport modelling of the proposed allocation sites undertaken by SCC highlights likely congestion hotspots and any mitigation needed for sites to be allocated for development. This evidence has informed the site allocations, and key infrastructure needed to support this development is outlined in the Infrastructure Schedule.</p>	<p>No change</p>
<p>Traffic (Reigate) Reigate is already overcrowded and over-congested. the M25 opening and some decisions regarding company locations have contributed to this. Many roads are now downright dangerous. Reigate and surrounding areas will become unliveable.</p>	<p>Our transport modelling of the proposed allocation sites undertaken by SCC highlights likely congestion hotspots and any mitigation needed for sites to be allocated for development. This evidence has informed the site allocations, and key infrastructure needed to support this development is outlined in the Infrastructure Schedule.</p>	<p>No change</p>
<p>Without putting compulsory purchase orders on existing housing to demolish and widen roads necessary for accommodating the extra burden on local traffic, there will be very little that can be done to mitigate the misery that local people will have to endure by large new housing</p>	<p>Our transport modelling of the proposed allocation sites undertaken by SCC highlights likely congestion hotspots and any mitigation needed for sites to be allocated for development. This evidence</p>	<p>No change</p>

developments.	has informed the site allocations	
<p>The local roads would also face major problems. Around 8.30am on any given weekday in term time there is traffic backed all the way up Prices Lane from the Angel junction and it can sometimes take in excess of 15 minutes in the car to reach the traffic lights from the Slipshatch Road junction. This can be even worse if there is problems on the M25 and Cockshot Hill gets congested in both directions. Almost all of the time Prices Lane is one way traffic only due to parked cars on the road. The introduction of potentially 200+ more cars in the local area would bring it to its knees. Sandcross Lane is similarly congested - both roads are crucial walking routes for children at Reigate School and / Sandcross Schools who don't need the extra pollution in their lungs.</p>	<p>Our transport modelling of the proposed allocation sites undertaken by SCC highlights likely congestion hotspots and any mitigation needed for sites to be allocated for development. This evidence has informed the site allocations</p>	No change
<p>Careful not to over develop as puts a strain on local schools, hospitals and doctors surgeries, who are stretched enough. Roads/transport which are busy and not efficient anyway. Consider the impact on services, including train stations with already full platforms. Libraries have been reduced and although running not always efficiently. Mobile network and broadband etc can be shocking bad in the area.</p>	<p>The planning of development through the new development plan enables us to better co-ordinate new and expanded infrastructure to cope with the pressure from new developments.</p>	No change
<p>Better location for sites - i.e. flats and old people flats/homes near a town, where easy access for them to get out and not rely on public transport.</p>	<p>The Development Management Plan, as with its precursor, the Core Strategy, is focussing development as much as possible on locations in town centres and also wider urban areas. These generally have access to the most services without using a car. However these areas do not have enough capacity without harming their character and environments of</p>	No change

	existing residents to accommodate all the housing we need over the plan period.	
At my address we don't have a supermarket, dentist or GP surgery within 25 minutes walk.	Some more rural areas of the borough and housing at edges of towns may be some distance walk to nearest facilities and services.	No change
The villages of Charlwood and Hookwood in the south east of Mole Valley do not have their own doctor's surgery. Residents of Hookwood, in particular, are likely to be registered with practices in Horley which is reflected in Fig. 2 of Infrastructure Needs Evidence: Healthcare. This evidence paper also identifies greater pressure on GP places in the south of RBBC as a result of planned development. MVDC is glad to see that options to meet this need have been considered in paragraphs 2.43-2.46 of the Infrastructure Needs Evidence: Healthcare document and would ask that they be kept informed of this cross-boundary issue when assessing the infrastructure implications of potential developments around Horley. It is also noted that Horley and Hookwood/Charlwood are in different CCG areas and therefore consultations with both Surrey Downs and East Surrey CCGs may need to be carried out.	We are involving both Surrey Downs and East Surrey CCGs in our ongoing planning to ensure sufficient healthcare facilities are in place to support our planned housing.	No change
SCC has concluded that there are a range of service providers that require new accommodation in the short-medium term. In addition to ensure the continuation of service provision where appropriate, we also consider that there is the potential to improve social/community infrastructure and facilities by integrating with other compatible land uses such as retail and residential.	Policies RET4 supports new community uses in certain non-centre non-designated centre locations.	Add to the glossary for "Community Facilities" " <b>all D1 uses</b> ".

<p><b>(Comment from TFL and supported by Mayor of London)</b>  INF1 - A number of TfL bus services run into Reigate and Banstead including S1, 80, 166 and 405. As such, TfL in principle welcomes policy support for seeking developer funding for bus service improvements, including extra capacity if required and sustainable in the long run as well as towards new and improved bus infrastructure (bus stops, bus stands, interchanges and garages). This would be particularly relevant in serving identified growth areas and/or larger individual developments, mitigating the impacts of additional demand for bus journeys on existing routes or new ones. TfL also welcomes policy support for developments to mitigate their impacts on the road network, particularly in order to maintain and preferably improve bus journey times. This could include funding and/or providing bus priority measures. It may also include junction improvements on important cross boundary routes.</p>	<p>Our CIL Regulation 123 infrastructure list specifies that public transport improvements will be funded from CIL money, whilst planning obligations will be used to fund on- and off- site public transport improvements that are required by a specific development.</p>	<p>No change</p>
<p>Adequate infrastructure must be guaranteed before developments are approved.</p>	<p>Policy INF1 requires necessary infrastructure to be provided before it is first needed to support development. These are secured at the time that permission is given, but means of planning obligation, highways agreement or Community Infrastructure Levy requirements linked to a planning permission.</p>	<p>No change</p>
<p>Creating a direct link from Balcome Road area across to the M23 Spur or M23 roundabout is key to keeping the town centre safe and not overcrowded of vehicles. Involve local businesses in the plans and get them to help you; we use the areas and small changes can mean huge differences to a project(s)</p>	<p>Your input to achieving the most suitable infrastructure to support planned development is welcome. Please see the transport modelling and IDP for further detail of planned road improvements.</p>	<p>No change</p>

<p>There is no provision for a school in the Sandcross Lane plans. My children, who live 0.5 mile from Sandcross School, are already outside of the catchment area as it's so oversubscribed. They would only need to cross just one minor road to be able to walk there. Where there are large housing developments there are more children who need schools. Where will they go?</p>	<p>Reigate Parish Church infants school will expand in Sept 2017 from a 2 FE infant school (180 places) to a 2FE primary school (420 places), creating an additional 240 additional places in Reigate to Add to basic needs. Half of all places are open to pupils of any / no religious denomination. This includes a new two storey building providing 8 classrooms, a multi-use games area and other improvements.</p>	<p>No change</p>
<p>With all the new housing to the area has it been researched if East Surrey Hospital can take the additional pressure? Is more funding and resourcing go to help with that? Also, what of the water supply - it only takes a hot summer at present, to run down our reservoirs - has the impact of all these extra homes on the water supply been researched?</p>	<p>The additional pressure arising from new development and potential solutions has been considered in the Health Needs Technical Paper, June 2016 and the Infrastructure Delivery Plan 2017 which were prepared in support of this plan.</p>	<p>No change</p>
<p>I'm also interested to hear what the water companies are doing to address all the new houses. It wasn't too long ago that after a few dry summers we had a severe water shortage. Building more houses are going to add to that problem the next time we have a dry period.</p>	<p>Our on-going work with utilities companies to plan for new housing in the borough is summarised in the IDP 2015 and IDP addendum 2016. Also see Policy INF1 and CCF2 that will ensure water and wastewater capacity is adequate to support development. Sutton and East Surrey Water has advised of likely need for reinforcement to trunk mains to support the strategic urban extensions proposed.</p>	<p><b>Need for site owners / developers to consider reinforcements early in the process have been added to the draft site allocation policy requirements.</b></p>
<p>The Council must and should have consulted on the infrastructure needs to meet its housing requirements with the appropriate infrastructure and service providers. It would be wrong to expect the house building industry to meet the</p>	<p>We have been carrying out on-going discussions and consultation with the various relevant infrastructure providers throughout the process of preparing the</p>	<p>No change</p>

<p>infrastructure needs of the wider borough or fund utility companies that have failed to plan for the long terms needs of the borough.</p>	<p>plan.</p>	
<p>Waste: Waste management should be extended to include resource management, reuse and high value recycling. Waste sites going forward could be smaller scale, create more jobs, and should not include any thermal treatment of waste (except anaerobic digestion). This would help safeguard against current waste (or other industrial) sites in the Borough being proposed as thermal 'energy-from-waste' sites (incinerators), either by the public or private sector.</p>	<p>Surrey County Council prepares the Waste Plan for the whole of Surrey County, including this borough.</p>	<p>No change</p>
<p>It is unfortunate that the information is not yet available in the DMP on how the infrastructure will be funded. Surrey County Council's consultants showed a significant shortfall across the county, including Reigate and Banstead. We are very sceptical on how health, education and particularly transport capacity can be provided for the new development now proposed when there is already a shortfall and the loss of some existing facilities is proposed. For example, there is already congestion on the A217 south of Reigate and on the A25 to the east of Redhill and this will be exacerbated with the proposed urban extensions.  It is unrealistic to rely on public transport serving the urban extensions and shopping areas such as Banstead.</p>	<p>The infrastructure needed to support the plan is set out in the IDP 2015 and its 2016 addendum. The Developer Contributions SPD 2016 and the Community Infrastructure Levy Regulation 123 / Infrastructure list both set out the mechanisms by which developers will help to fund this infrastructure.</p>	<p>No change</p>
<p>We appreciate that urban extensions may be required during the plan period, but it is unclear how the highway network will accommodate the additional traffic. For example, at Woodhatch there are junction capacity problems as well as severe congestion on the A217 into Reigate which itself is often grid locked. The Surrey County Council infrastructure study showed a large deficit in funding to provide the necessary</p>	<p>The infrastructure needed to support the plan is set out in the IDP 2015 and its 2016 addendum. The Developer Contributions SPD 2016 and the Community Infrastructure Levy Regulation 123 / Infrastructure list both set out the mechanisms by which</p>	<p><b>Check that all necessary site-specific highways infrastructure is summarised as requirements in</b></p>

<p>infrastructure, including public transport and highway capacity. The transport study which provides supporting evidence to the DMP also shows that several roads are at capacity and junction delays will increase, yet there are no proposals to mitigate the problems arising from new development.</p>	<p>developers will help to fund this infrastructure. Some of the more detailed highways improvements are summarised in the site allocation policies.</p>	<p><b>the site allocation policies where necessary to the development</b></p>
<p>I, like many local residents have moved into the area from London to be close to family with a "workable" commute to my job. I believe Redhill has a vast amount of potential that could be realized by attracting the right businesses - nationwide and local, which will help generate local revenue. However, my concerns are on the availability of services and the risk to these being proportionally underfunded if development is mismanaged. For example, despite being in the catchment area for 3 non-religious schools just a few years ago and the development of Lime Tree Primary - we were not allocated school place in Redhill instead offered the best available spot over 3 miles away. Another example is the train service which is creaking under passenger numbers and development of small abodes will only add to that. More pressure needs to be applied to enhance the area if you want to use precious space to develop. It can't just be filling a quota on social housing needs, but also tangible additions to hard and social infrastructure be it schools, doctors surgeries, parks, investment in upgrading roads etc.</p>	<p>The infrastructure needed to support the plan is set out in the IDP 2015 and its 2016 addendum. The Developer Contributions SPD 2016 and the Community Infrastructure Levy Regulation 123 / Infrastructure list both set out the mechanisms by which developers will help to fund this infrastructure. Some of the more detailed highways improvements are summarised in the site allocation policies.</p>	<p><b>No change</b></p>



<p>The plan should have an explanation of how the uses will work together, making the place more useful for the community and, where possible, allowing people to do more than one thing in the same area. Having a good mix of uses is a vital part of creating sustainable places and communities. It should show that the amount of development planned takes into account how much development is suitable for the site. This should take account of the various restrictions identified in the site analysis and the aims of good urban design. It should balance a variety of design features such as solar gain, crime prevention and accessibility and explain the design decisions that are made. It would be very useful to explain the purpose of different parts of the site and placement of certain buildings or spaces. It should help explain that planned landscape design is based on a strategy for long term maintenance and management. It should explain the purpose of landscape design on the site, and how this will be achieved and maintained, for example to create a natural habitat, support an existing green corridor or provide a sensory garden or play space.</p>	<p>This level of detail is more appropriate to site specific briefs</p>	<p>No change</p>
<p>Not just plan - ENSURE the provision of them. Insist new developments include details on how many people they will house, where they think the dental, GP, school and hospital provision will come from and whether there is capacity. If not, insist homebuilders contribute to the cost of building extra facilities and then USE THE MONEY TO DO THAT, and don't spend it on generous public sector pensions or councillor expenses. We need more houses in the south east but we also need the infrastructure to support all the people that live in them.</p>	<p>We use details of average occupancy rates / household sizes from the census.</p>	<p>Policy INF1 includes how we will decide applications that don't provide necessary infrastructure</p>
<p>why 2 primary schools for Redhill and 1 medical facility for Reigate - I'd like to know? And what guarantees in place to ensure they go ahead?</p>	<p>See the Education Evidence Paper and the Healthcare Evidence Paper 2016, and Infrastructure Delivery Plan prepared to</p>	<p>No change</p>

	support the Development Management Plan.	
It will be imperative for the Local Plan to be effective that we maintain pressure on Surrey County Council, Network Rail, The Highways Agency and the Department for Transport to continue improvements to our local infrastructure. I am especially concerned that we ensure improvements at both Redhill and Reigate stations facilitate an expected increase passenger capacity and that the A217 level crossing at Reigate Station is reviewed in line with increased rail and road traffic in the coming years.	We are involved in ongoing infrastructure work with infrastructure providers to ensure that the planned housign can be delviered given that this is a requirement (Policy INF1) of development being granted planning permission	No change
Horley - If any of the 3rd party sites became available for DMP use, for example Horley Telephone exchange, it would be useful for public reassurance if there were notes provided on how the services provided by the 3rd party site would continue to be provided albeit elsewhere	In order to include sites in the plan for allocatio, we require the site owner to advise us that the site is no longer needed, or will no longer be needed within the plan period.	No change
In total this amount of development, notably the 2,400 homes and 24,000sqm employment in the Low Weald, seems enough to cause significant changes to cross-boundary travel demand. The development in Redhill and Reigate may also create some cross-boundary flow on the A23 London Road at Gatwick and B2036 Balcombe Road. The retail may be less likely to have a significant cross-boundary impact as there is a relatively small amount of comparison in the Low Weald, whilst convenience can be expected to have a local catchment.  Most of the individual sites around Horley are small and below thresholds for transport assessments and statements. Site NWH1: Land at Meath Green Lane, a potential reserve urban extension site, is over transport statement thresholds but under the WSCC transport assessment threshold at 75 dwellings, as is site SEH4: Land off The Close and Haroldslea Drive, Horley,	All of these sites listed will require Transprot Assessments to be prepared in support of planning applications by Surrey County Council as the Highways Authority	No change

<p>at 70 dwellings. It is nevertheless important that the contributions of such sites to changes in cross-boundary travel are considered, as the May 2016 Transport Assessment produced by Surrey County Council aims to do.</p> <p>Site HOR9, on the other hand, is a proposed strategic employment/leisure allocation to the south of Horley (150,000sqm gross floor area of employment has been assumed for transport assessment purposes). It is also located adjacent to the West Sussex county boundary and may account for a significant proportion of the total cross-boundary traffic from the proposed plan allocations.</p>		
<p>The transport study supporting the DMP is based on Surrey County Council's strategic highway model, SINTRAM. The model base year is 2009. This means that the base model is too old to be WebTAG compliant as the base travel demand data is more than five years old. This does not at all mean that the model results are invalid or should be disregarded but it does increase the extent of uncertainty in forecasting derived from this base. Uncertainty is, of course, inherent in all forecasting. There is a reference to data from 2007 to 2012 being used, so some data may be within the WebTAG five-year threshold, but other data is two years older than the overall base year.</p> <p>A reference year scenario of 2014 has been created but, from the information provided, this appears to be a current year forecast rather than a present year revalidation.</p> <p>The section on model validation shows that the model base year flows validate well against DMRB/WebTAG criteria for GEH and flow matching. There is no information on whether</p>	<p>The Development Management Plan Transport Modelling has been re-run for the proposed submission plan (at Regulation 19 stage). We will work with our neighbouring district and London borough authorities and the County Highways Authorities (and Transport for London) on cross-boundary traffic flows from large sites / sites close to borough boundaries.</p>	<p>Ongoing transport modelling work</p>

the model has been validated for journey times.

Figure 2.1 shows that the overall model study area is extensive, although it does not allow identification of which roads in West Sussex are included, due to its scale. However, figures 2.5 and 2.6 show that the model validation is on roads within Surrey only with the exception of A23 Airport Way, the M23 south of junction 9 and the M23 spur from junction 9 to 9a.

The accuracy of flows in West Sussex which cross the boundary from Surrey is dependent on the validation north of the boundary only, so accuracy of forecasts would decrease as traffic gets further into West Sussex.

It is not clear whether the model network in Crawley Borough includes full simulation of junctions. This should be clarified. It would be useful to have a network plan of a similar scale to figures 2.5 and 2.6 showing coverage in the north of West Sussex. It would also be useful to know which 'C' class roads are included in the model, including south of Charlwood.

In section 7 Appendix A: Link Flow Validation the tables at 7.1 and 7.2 show that the B2036 Balcombe Road, and southern Surrey stretches of the A23 Brighton Road in Horley and A217 Reigate Road validate reliably for flow matching. However information does not appear to be present for the M23 south of Junction 8.

In Chapter 4: Model Forecasts and Analyses forecast flows are not shown in the Gatwick / Crawley area, either in tabular information or in plots such as the flow difference plots at figures 4.1 and 4.2.

Cross-boundary impacts are examined in section 4.8 of the study report and results are presented in tables 4.10 to 4.13 for seven scenarios. Scenario 1 is the do-minimum growth (forecast year reference case) which scenarios 2 to 5 look at housing locations in different parts of the Borough. Scenario 6 combines the housing locations, whilst Scenario 7 is the only one to add in the employment and retail impacts. Therefore the relevant comparison for looking at Plan impacts on West Sussex is the differences between Scenarios 1 and 7.

Although the tabulated cross-boundary flows are shown at the boundary of Reigate and Banstead only the B2036 Balcombe Road is identified as being at the WSCC boundary. The A23 Brighton Road and A217 Reigate Road flows are shown at the Mole Valley boundary, which is very close for the A23 and is north of Hookwood for the A217.

We would like to know what the combined impact on the A23 London Road is predicted to be at Gatwick going past the airport and reaching the junction with Gatwick Road. It would also be very useful to know if there are any significant flow changes south of Charlwood on Lowfield Heath Road and Charlwood Road. Furthermore we would like to establish if there are any flow changes of over 50 vehicles per hour which could create the need for junction tests and potential mitigation at any of the following West Sussex junctions:

B2036 Balcombe Road / B2037 Antlands Lane  
 A23 London Road / Perimeter Road North link Road  
 A23 London Road / Gatwick Road  
 A23 London Road / Old Brighton Road (at Lowfield Heath)  
 Charlwood Road / Bonnetts Lane  
 Ifield Avenue / Ifield Drive

<p>Ifield Avenue / A23 Crawley Avenue</p> <p>Given the employment allocation and collection of housing sites at Horley, the tabulated flow differences for B2036 Balcombe Road and A23 Brighton Road appear lower than may be expected, notably in the AM peak. Some further explanation of the flow changes would therefore be useful. Are increases in development traffic being balanced by flow re-assignment elsewhere? As we understand it, this is a highway model and would not be forecasting mode change?</p> <p>In summary we do not consider that we have yet seen sufficiently detailed analysis in order to judge whether the DMP’s likely cross-boundary transport impacts would be NPPF-compliant within West Sussex or could be made so with appropriate and deliverable mitigation. We would welcome an opportunity for early discussions of our comments and queries regarding the Transport Assessment with officers of both Reigate &amp; Banstead Borough Council and Surrey County Council.</p>		
<p>The quality and type of surface access and overall connectivity of the Borough is a crucial factor in its success and is therefore core to the development programme for the area. For the DMP to add to the economic performance and sustainable development patterns of the Borough, GAL believes the investment in new transport infrastructure and improving the efficiency of existing networks must be a high priority for R&amp;B BC and the County Council Transport Authorities. The Borough has positive rail and road connections to main transport arteries for example the A23, M23, M25 and Gatwick Rail Station, with the Gatwick Express to London and Brighton. GAL has committed significant investment into expanding and</p>	<p>We are working on an ongoing basis with relevant highways and rail infrastructure providers to ensure that overall (though Transport modelling and mitigation) and site specific Transport Assessments, the road and rail network will be resilient to development. Horley Strategic Employment Site allocation policy will maximise opportunities from its location close to the airport and the stratgic road network.</p>	<p><b>Potential site allocation</b></p>

<p>improving Gatwick Airport Rail Station and this will improve the frequency of rail service and the connectivity to key destinations. This exciting modern rail /airport interchange could also be utilised by R&amp;B BC to further raise tourism, attract employment and commercial investment to the Borough as part of the overall proposed development strategy. Access to international opportunities is an opportunity GAL considers R&amp;B BC could wholly exploit and integrate into the DMP. ..the ability to access the wider international markets from utilising the economic potential of the airport can only make a positive contribution to the opportunities for the sustainable development of Reigate &amp; Banstead</p>		
<p>The Royal Alexandra and Albert School is an important educational facility for the Borough and the wider area, offering a unique educational offering to a large number of pupils. In addition the School site includes nationally important heritage assets and the protection of both the educational facility and heritage assets must be secured for the future. In order to continue to develop, the School will need additional resources (including inter alia an additional boarding house, additional classrooms and additional sports facilities) as well as upgrading and replacing of existing buildings throughout the School campus. In addition ongoing works to maintain the heritage assets on the site will need to continue. The Foundation does not have the funds it needs to be able either to undertake the desired capital development or to maintain the parkland assets to the level it would wish. This is exacerbated by the continuing pressure by government on funding for schools. The Foundation is therefore reviewing how works should be prioritised and funded and new income streams are having to be considered. The Foundation/School therefore request that, as part of the</p>	<p>The school is Green Belt and AONB and set within a historic park/garden. AONBs are amongst the national designations with the highest status of protection for landscape and scenic beauty in the country. Within AONB, national policy states that major developments should be refused unless in the public interest. We appreciate the school's situation, and will work constructively together through the development management system to facilitate its ongoing success, including maintenance of its buildings and historic gardens. It would not be appropriate to change these important designations set out in our Local Plan and beyond.</p>	<p>No change</p>

<p>emerging Development Management Plan, a policy is included which sets out clear guidelines on the acceptability of future development at the site including educational development, development connected to the heritage assets and enabling development. This may include some changes to the existing Zoning Strategy, however, as a planning policy, this would formalise the acceptability of the development strategy.</p>		
<p>As a resident of Horley, my comments only relate to the development plans for this town.</p> <p>#1 - the identified sites for development in the town centre are too numerous. In developing all the sites, the character of the town centre will be lost. In particular, the Police Station and LLoyds TSB block should remain. There is open space around the telephone exchange which should be retained. The town is visible from the railway with the car parks adjacent and development there will conceal it.</p> <p>#2 - If the library is redeveloped, another should be put in place.</p> <p>#3 - The plans should consider introducing open spaces. The nearest space to the town is the Recreational Ground which is quite a walk from the centre on Victoria Road/High Street junction. When the new development, Russell's Square was constructed, as Council land, no consideration was given to public realm and the town have ended up with a huge block. This should not be repeated.</p>	<p>Retention (or re-provision on another site) of Horley library is specified in the site allocation policy as a requirement of the site's redevelopment. Policies OSR1 and OSR2 protect designated open space in towns and set standards requiring provision to support new housing development.</p>	<p><b>Site allocation policy wording refined</b></p>



<p>The service provided from Redhill station by Southern is totally inadequate. We should have far more trains, particularly in the peak hours. Redhill is the 6th (I think) busiest station on the Brighton line. On the previous page I mentioned the train service provided from Redhill. The local Rail Users Association has made great strides in getting Redhill recognised as a major station on the Brighton line but we still have a service that has deteriorated over the years. There have not been any through trains to Brighton for some time but more recently we lost our only off peak through service to the South Coast (Portsmouth, Southampton and Bognor). In the most recent emergency timetable, our off peak through service to Victoria has also been cancelled. Our area does lose out when it comes to the train service and I would want to see the Council become more pro-active in defending the rail passenger. Other local councils do and unless we make our voice heard our service could be dictated by TfL. That's right, Transport FOR London (capitals intentional), an organisation over whom we have no electoral control could be changing our train service to meet the needs of those living in the GLC area, not us.</p>	<p>We are working on an ongoing basis with the relevant rail infrastructure providers to ensure that the rail transport needs of the area are taken into account in planned network changes. This includes the NorthDowns Line service improvements, and the new Platform 0.</p>	<p>No change</p>
<p>Developers should be made to include things that will create a community e.g, park 25/ Watercolour developers were not made to provide schools/ community centres etc which would have given the people living there a much improved community feel to their area, plus children would have had a school on their doorstep - it was only when Lime Tree was built by the council that the situation improved.</p>	<p>Waterclose Park development included a nursery school and doctor's surgery. Its size did not generate a need for a new primary school.</p>	<p>No change</p>

<p>We share the Federation’s concern that information is not available in the DMP on how the infrastructure needed to support development can be funded and we would like clarity as soon as possible on how the health, education and transport needs of the growing population can be provided</p>	<p>Infrastructure funding for the necessary infrastructure to support the plan is identified in the Infrastructure Delivery Plan and Infrastructure Schedule in the Development Management Plan. Some funding sources are public sector funding (such as Education Funding Agency's Basic Needs Funding, and Department for Transport), some money is available from infrastructure providers such as utility companies, whilst other infrastructure funding is from developers through the Community Infrastructure Levy and planning obligations.</p>	<p>No change</p>
<p>Yes however you need to take a holistic view. It would be detrimental to focus on the suitability and viability of a site itself before considering the infrastructure, services, and access required to support a locations development</p>	<p>The two issues of infrastructure need and site viability are linked. The infrastructure to support development in the area is already detailed in the Infrastructure Delivery Plan. Developments will need to be viable with the required infrastructure and Community Infrastructure Levy payment, or they will be refused.</p>	<p>No change</p>
<p>Property developers should be made to contribute a LOT more to current local Infrastructure, especially in relation to building new schools for children in new houses and additional key amenities such as schools, playgrounds, medical facilities, car parks.</p>	<p>Our Community Infrastructure Revised Viability Assessment Report, March 2015, and our Development Management Plan Viability Study 2017 detail how much developments can afford to pay towards infrastructure costs, whilst ensuring that developments remain viable (including with a slight "buffer" to allow for changes in cost, differing economic markets, etc)</p>	<p>No change</p>

	so that they can be built out.	
TDC raise concerns over the impact on the local roads and the M23. Further work needs to be undertaken to understand how this will either be mitigated or the extent to which it could affect TDC residents and road users in the area.	Surrey County Council has modelled the impact of the planned development on the road network, and recommended suitable mitigation where needed.	No change
Something needs to be done urgently to sort out the traffic issues at the M23/A23 Hooley interchange. More homes means more cars and the road system around the M23/A23 interchange at Hooley is already not coping.	Improvements are planned. See the Infrastructure Delivery Plan and Infrastructure Schedule.	No change
Health - The local health provision in East Surrey CCG locality is in total disarray with many general practices closing their books and the closure of South Park Surgery, resulting in 4000 people with no GP. There will be no medical facilities for the new residents moving in to the proposed development sites. If 7000 homes are to be built eventually the population could increase by 28000 which would require at least two new doctors surgeries. Local practices are struggling to recruit any new partners let alone the 14 full time GPs required to service this number of new patients.	The closure of South Park surgery and resultant additional pressure on other surgeries in the area has been considered and accounted for in our infrastructure planning. NHS England is looking to extend the Wall House Surgery on York Road to accommodate some of these patients.	No change
We are already busting at the seams and have massive traffic issues in the area. The local services are stretched and we have lost one of the Drs surgeries.	Site Allocation Policy for land at Sandcross Lane South West of Reigate includes land to be set aside for a health centre to provide additional capacity.	No change

<p>Education - It should be noted that nearly all primary schools in Crawley have expanded and work is being undertaken on the feasibility of expanding secondary schools. An alternative solution that we are seeking to facilitate is the provision of a new free school to cater for a shortfall of 6FE anticipated in secondary from 2019 onwards. However the shortage of suitable sites within the Borough is a significant problem. We are aware that a new primary school is planned for Horley and that the Horley secondary school, Oakwood, plans to expand by 2FE by 2018.</p> <p>Strategic housing sites are being developed within or adjacent to Crawley at Kilnwood Vale and Forge Wood. There are further strategic sites identified at Copthorne (outline consent granted), Pease Pottage (proposed local plan allocation) and West of Ifield (allocation being sought by a developer consortium). Crawley may therefore be unable to cater for its growing secondary school population within the Borough boundary and this could add to pressures on Reigate and Banstead schools by 2019.</p> <p>We would value any advice about potential sites for a new secondary free school close to the Borough but in a neighbouring authority and have contacted Surrey County Council as well as district councils such as Horsham and Mid Sussex to discuss further.</p>	<p>We are unable to set aside land for a new secondary school to provide predominantly for Crawley pupils , although Surrey County's School place planning work does consider cross-boundary pupil movements, particularly at secondary school level.</p>	<p>No change</p>
<p>2. Highways improvements needed to maintain or even improve traffic flow around developments, key infrastructure sites or on major routes. This to include the potential of a new M23 J9 to A22/M25 J6 relief road to reduce traffic demand in Reigate and Banstead through normal traffic and diverted traffic during M23 incidents</p>	<p>The key infrastructure needed to support the development planned is included in the Infrastructure Schedule.</p>	<p>No change</p>

<p>South Reigate - such a development would have costly implication in terms of need for more local infrastructure.</p>	<p>Infrastructure needed to support the planned development is outlined in the Infrastructure Schedule and will be funded by developers through planning obligations and Community Infrastructure Levy, and from mainstream government funding (such as through the Education Funding Agency and Department for Transport).</p>	<p>No change</p>
<p>390 homes in the Southpark and Woodhatch area would be a disaster. 390 homes means 800+ people, 800+ cars causing even more congestion, over stretched schools, hospitals, doctors, ambulance and fire services. The roads are totally inadequate for existing levels of traffic and failure to maintain them has led to third world surface conditions. Increased traffic would increase the rate of decay of the present road surfacing. Will our “planners” enter a section 106 agreement whereby the developers pay for the complete re-surfacing of all roads in Reigate? Also the cost of providing new sewage pipes as existing cannot cope at present.</p>	<p>Surrey County Council's transport modelling has considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. The infrastructure needed to support the development planned is included in the Infrastructure Delivery Plan and the Key Infrastructure is summarised in the Infrastructure Schedule.</p>	<p>Infrastructure Schedule of key infrastructure to support the planned development is included in the plan.</p>
<p>Traffic entering Redhill from the A25 east has a problem with congestion. Essentially there is too much going on between Redstone Hill and the centre. More housing to the east of Redhill is unlikely to improve the situation</p>	<p>Surrey County Council's transport modelling has considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed.</p>	<p>Infrastructure Schedule of key infrastructure to support the planned development is included in the plan.</p>
<p>A number of historical changes have been made in attempts to reduce the huge volumes of traffic in the Borough's Town Centres, many meeting only short term success. Until we learn that (in the case of Redhill) a town ringed by roads will never</p>	<p>Noted</p>	<p>No change</p>

<p>have good traffic flow when we persist with a system of roundabouts with pedestrian crossings at every entry and exit point. this will forever be the case. This requires true visionary thinking beyond that currently employed.</p>		
<p>I have seen over the last 20 years in this area a huge increase in traffic. The same journey to work has more than doubled the time it takes on a daily basis compared to when I started the job 19 years ago. With the building of even more houses and no addition of any roads or improvement (except for adding traffic lights) together with the problems that exist with public transport, the situation will only get worse with the increase in traffic that the building of new business premises and new homes will cause.</p>	<p>Car ownership in the area has increased (see census data). It is acknowledged that road traffic will increase and some existing roads and junctions will need upgrading to cope with this additional traffic.</p>	<p>No change</p>
<p>INF1: planning for waste management is a county matter and policies in this plan should be prepared in consultation with SCC (see comment on ERM3 above).</p>	<p>Acknowledge importance of sufficient waste management facilities in the right places to serve the county. We continue to involve Surrey County Council, as the waste management authority for the county, in the preparation of the Development Managemnt Plan.</p>	<p>No change</p>
<p>The roads around Reigate and Redhill are already very busy and the current developments (such as Westvale park) I don't believe fully take this into account. (Commuting from Westvale Park will go to Redhill station along already overly busy roads to overly busy stations). I believe the current new developments (Westvale park) have been permitted without considering how 1000+ new homes will impact the A127 and A23 into Reigate and Redhill and as far as I'm aware there are no plans for new major routes to be built in the area.</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions, rather than new major roads (although new access roads will be built to serve large-scale new developments).</p>	<p>Infrastructure Schedule of key infrastructure to support the planned development is included in the plan.</p>

**Trains** - Without good, reliable, affordable train services any development will fail and DMP objectives can't be delivered. This is a commuter area. Relies on wealth earned in London, spent here. Toll on physical and mental health of deteriorating train services impacts on local health provision, family breakdown etc. The roads are clogged, because no one trusts the train service. Unreliable, expensive train service will make people drive more. Environment not sustainable without good train service.

It's a struggle to get a seat on a train at commuter hours. Needs a viable train station in order to support the infrastructure. From 2018, there will be no direct services to LBG unless Platform 3 is approved. Seems little point in building new homes/schools when Reigate will cease to be a viable commuter option - Reigate train station needs platform 3 before you do any of this. People are already leaving the town as a result of the shocking transport links and cutting the town off from the City is going to have a massive impact on local businesses and house prices.

As you may have heard, from 2018 when the LBG works are finally finished, Reigate will cease to have a direct service to LBG. Instead, local residents will have to change at Redhill or East Croydon in order to access LBG, the City and Canary Wharf and the same coming home. I understand that this is due to the new fixed 12 car trains that will be in place but can I ask what, if anything, is being done about this? When moved to Reigate 5 years ago, it was largely due to the ease of the commute; I had 5 Trains to choose from on any given morning (3 Direct to LBG, 2 with very quick changes at Redhill) – now I have 1 direct train (which isn't feasible due to Nursery and Childcare drop offs) and the remaining ones all require at least one change. The last 12 months have been bad enough, but

A new Platform 3 would take the longer trains running on the Thameslink service to London Bridge, as part of works on a North Downs Line upgrade. Whilst this is in principle supported (subject to resolution of impact on level crossing), there is no funding currently available from the rail operator nor from other sources. We continue to work with Network Rail to consider the level of support for this change and potential funding sources for the new platform that will enable a quicker and more frequent service between Reigate and London.

No change..

the prospect of continuing to get up to 3 trains to work and the same back again each evening for the foreseeable future is beyond the pale.

I understand that the proposal for a longer platform at Reigate has been mooted but at this stage, rejected. Local opposition to it seems to emanate from The Reigate Society who have objected to it on the grounds of the loss of parking spaces it will involve. I'm not sure if you've ever looked at the Station car park at Reigate, but its use is minimal at best. Very few people use it, and instead park for free on the surrounding roads, so I'm not sure their objections are valid, and certainly not in the area's best interests. I also understand it may be a question of funding, but maybe you can shed some light on this point, and what we, as local residents and commuters can do to help push this proposal through.

Make no mistake, failure to get the longer, 12 car platform will have disastrous implications for the Reigate area, affecting local businesses and residents alike. House prices will be affected and the footfall to the area will reduce considerably. I already know of several families who are looking to move away from the area to one with better train service, or who are having to restructure their work/life balance in order to make this work, with one of them giving up work to look after their children. Local residents are looking for solutions and answers and yet again, we seemingly have no one pulling for us - I urge you to get involved on this issue before its too late to do anything about it .

Steve Trigg of the RRDRUA is actively involved in pushing for this project, so please liaise with him and the group to see what can be done. People will start voting with their feet soon



<p>The borough council seems to ignore the poor provision of national rail transport from Redhill, due to ongoing issues with the existing franchise. Further timetabling changes should be factored into the "attractiveness" of Reigate and Redhill as development sites and the local borough should seek to work with other boroughs in the area to put pressure on the franchise operator and DFT.</p>	<p>We continue to work on an ongoing basis with Network Rail (and through them, the Rail Operators and DfT) and lobby for appropriate, frequent and reliable train services to stations within the borough.</p>	<p>No change</p>
<p>I haven't seen any plans so far too address the infrastructure needs of the new developments currently in progress. These infrastructure improvements should be in place before the new developments are finished not after.</p> <p>As long as transport and infrastructure are also update to cope with additional cars and people, as this isn't normally the case Yes but this never happens it hard enough trying to get a road resurfaced which we have been trying to do for over 5 year, all we get told is there is no money so not sure how you plan to do this</p> <p>There is nothing in the plan to cover new secondary schools for the borough, new doctors surgeries, improved hospital facilities or improvements to the road network. All of these areas currently cannot cope with the population. You plan to build many more houses across the borough but do not plan to support the huge increase in both people and vehicles by improving the local infrastructure and support needed for such a big increase. Your plan is therefore flawed and not fit for purpose!</p> <p>New homes that bring families to the area without investment in schools and other key infrastructure should not be allowed The infrastructure such as transport (Southern), schools and doctors/hospitals can barely cope with its current numbers. Adding more would just be madness.</p> <p>When planning a new development, it is important to not only</p>	<p>Surrey County have transport modelled the likely impact of the planned development on the road network. It considered the impact of the planned development on the road network, and have recommended suitable mitigation where needed. This generally involves improvements to existing roads and junctions. We are working with the local education authority responsible for planning school places in the area. They have a responsibility to ensure that there are sufficient school places for the borough's residents. Infrastructure to support approved developments being built will be funded and / or provided by the developer through planning obligations or financial contributions to the Community Infrastructure Levy. Developers are required to provide or make contributions to the infrastructure needed to support the development planned.</p>	<p>Infrastructure Schedule of key infrastructure to support the planned development is included in the plan. Policy INF1 requires necessary infrastructure to be provided or secured for a development to be acceptable.</p>

<p>think of the locality in which to build, but the affect and needs of the local area. To build dwellings in Sandcross Lane without giving thought to the local road infrastructure, parking and local businesses would mean the area would suffer as a whole. Taking Woodhatch as it currently exists. We have ample open space, but insufficient parking which means local business struggle to compete with out of town shopping centres. This is wrong as it destroys any sense of community which is important to an increasingly ageing population who may have no means of transport to these areas, making them more isolated.</p> <p>Infrastructure such as local shops, schools and facilities for the elderly must accompany the swathes of new housing to ensure a well shaped community.</p>		
<p>How can so many new houses be built with no plans to increase utility capacity: hospital, doctors, school (primary but also secondary), parking etc? I am not convinced that the proposed planned will actually deliver on this promise to minimise the impact on the existing community.</p>	<p>The plan policy INF1 includes requirement for infrastructure to be provided to support planned development. Some of the site allocation policies include specific new infrastructure, such as medical surgery.</p>	<p>Infrastructure Schedule of key infrastructure to support the planned development is included in the plan.</p>

**Water** - consider that there should be a separate policy dealing with both water supply and wastewater infrastructure as they are essential to all development. A key sustainability objective for the preparation of the new local plan should be for development to be coordinated with the infrastructure it demands and to take into account the capacity of existing water and wastewater infrastructure. The NPPF includes specific guidance on water and sewerage infrastructure (paragraphs 156 and 162 are quoted). The web based NPPG published in March 2014 includes a section on water supply, wastewater and water quality and sets out that local plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs[...]. The DMP should therefore include supporting text and policy requiring developers to demonstrate that there is adequate water supply and wastewater/sewerage infrastructure capacity both on and off the site to serve the development and that it would not lead to adverse amenity impacts for existing or future users in the form of internal and external sewer flooding, pollution of land and water courses and/or issues with water supply in the form of no or low water pressure.

Thames Water therefore requests that the following additional policy is included:

Planning permission will only be granted for developments which increase the demand for off-site water and wastewater infrastructure where:

- 1) sufficient capacity already exists; or
- 2) Extra capacity can be provided in time to serve the development that will ensure that the environment and the amenities of other users are not adversely affected.

In accordance with the PPG, when there is a capacity

We welcome your helpful advice on this important issue.

Policy INF1 has been written to include a requirement to ensure adequate connections to foul drainage, water supply, and adequate wastewater treatment infrastructure before a development is occupied.

<p>constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the appropriate infrastructure improvements will be completed prior to occupation of the development.</p> <p>Supporting text along the following lines should also be included:          The council will seek to ensure that there is adequate water supply, surface water, foul drainage and waste water treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed developments will lead to overloading of existing wastewater/sewerage infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered. The development or expansion of water supply or waste water treatment facilities will normally be supported, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.</p>		
<p>The Environment Agency encourages growth that can be supported by the necessary environmental infrastructure, for instance water resources and flood risk management provided in a co-ordinated and timely manner to meet the physical and</p>	<p>Noted</p>	<p>Policy CF2 sets out requirements relating to flood risk, and Policy</p>

<p>social needs of both new development and existing communities. Early investment and careful planning may be required to ensure expanded or improved infrastructure will have the capacity to cope with additional demands.</p>		<p>INF1 in relation to water resources.</p>
<p>Cycle paths - Crucial to consider cycle paths, particularly on major routes</p>	<p>Cycle route improvements and extensions are included in the Infrastructure Delivery Plan</p>	<p>No change</p>
<p>Drainage - Where we have identified sites where drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development, in the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure required to support the development in line with the new policy promoted above.</p> <p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure our infrastructure is in place ahead of occupation of the development.</p>	<p>Your helpful advice regarding infrastructure to support certain sites allocations is welcome.</p>	<p>Site allocation policy wording refined to include a satisfactory drainage strategy to be submitted and agreed in writing before development can proceed.</p>
<p>Council's stance is not sufficiently strong. The impact on major A roads such as the A25 and A217 cannot be underestimated and if any development is approved, the council should utilise it's powers under S106 to seek maximum investments in local infrastructure by developers. The alternative is that existing residents have to both suffer disruption and inconvenience, potential adverse property price impacts and then funding requirements for local infrastructure which should be met by developers.</p>	<p>SCC's Transport Modelling has considered the impact of planned development on the local road network.</p>	<p>Policy INF1 includes a requirement for these issues to be resolved for planning permission to be granted.</p>

<p>I do not feel the document gave enough weight to the view of residents which would principally be, if we are required to have greenbelt development (something which many would disagree with) we certainly should not be undertaking the development until all brownfield sites are utilised. The council should adopt this as formal policy (assuming legislation permits) and actively block such greenfield developments or land releases until brownfield sites are fully utilised.</p>	<p>Core Strategy policies CS3 and CS16 set out our spatial strategy, which is to release sites outside of current urban areas (as extensions to the urban areas) only when urban sites have been exhausted.</p>	<p>The larger site allocation policies now include infrastructure triggers for the Urban Extensions, as set out in Core Strategy Policy CS16.</p>
<p>This is a hideous money grab -- if new homes must be built make them all social homes freeing up the council's housing benefit bill from private owners and also all of the properties thereof. You should be ashamed of yourselves for even considering this moneymaking scheme</p>	<p>Most new affordable homes are built by private developers as part of the policy requirement for planning permission. National government planning policy requires us to plan to meet the need for affordable homes in the area, and also to meet the demand for the market homes in the area.</p>	<p>No change</p>
<p>There needs to be a stronger emphasis in the plan on developing local infrastructure to achieve this aim. The transport document should be renamed 'roads'. There was no mention of trains or bikes, which for a commuter area is baffling- I understand that this may fall outside of council control, but the transport area of the plan is woeful.</p>	<p>The Infrastructure Delivery Plan includes improvements and extensions to cycle routes.</p>	<p>No change</p>
<p>The plan is massively lacking when it comes to transport strategy. There is no mention of rail, whether it is safeguarding current service or improvements. The rail service is currently creaking at the seams and will no cope with more homes in the area. Regardless of whether this is within the remit of local councils or not the success of future development plans hinge on the transport network. When it comes to cycling the current state of the cycle lanes is very poor and often</p>	<p>The Infrastructure Delivery Plan includes improvements and extensions to cycle routes.</p>	<p>No change</p>

<p>dangerous. In many cases the surfacing is uneven or potholed; lanes are disjointed or run out at inconvenient and dangerous points. There is also a particularly nasty habit of drivers parking across them for instance on the A23 going south towards Horley by the McDonalds and fish and chip shop. This makes it very unsafe as bikes have to swerve into traffic.</p>		
<p>Which leads on to the road network. Cockshot Hill &amp; Bell Street are often very backed up. The two routes around this are Park Lane and Chart Lane which can be very difficult to navigate due to completely blind sight lines and extreme narrowness. Maybe they should become one way or that the current one way system in Reigate be reviewed with a view to possible 2 way again. It's worked very well in Redhill, I feel. Any new development MUST account for usage of schools, doctors, local shops as well as roads, parking and infrastructure. With regard to schools we are in turmoil over places with many people in South Park being given Salfords and other sites for example. My friend in New North Road couldn't get into Sandcross school this year and now drives to another school. I appreciate that this year may be exceptional, or it may not. Personally we live about ½ kilometres from school and in 2 years of doing a school run we have driven twice (tight timings for appointments). It is, I believe, a really important part of the day. Primarily from a fitness point of view, but also from a sociability angle as well as a walk wakes us up, making us ready for the day. Also it is a lot less stressful than trying to drive and park.</p>	<p>Surrey County Council's Transport Assessment (May 2016) identifies Cockshott Hill and the A217 north and south of Reigate town as transport "hotspots" (areas where drivers are subject to considerable delay), which are likely to require mitigation to facilitate any development in the local area. Park Lane and Chart lane are smaller rural residential roads and were not identified picked up. RBBC and SCC are working together to explore how the road network around Reigate can be improved.</p>	<p>No change</p>
<p>Page 74 Policy TAP1, especially clauses (a) and (b)iii: The Council is surprised that the Transport Assessment appears to devote little or no attention to the junction A23/Three Arch Road which already causes massive congestion at all times of day. This is particularly important in regard to ambulance</p>	<p>Surrey County Council's Transport Assessment (May 2016) identifies the A217 junction with Woodhatch Road and Prices Road as a transport "hotspot" (areas where drivers are subject to</p>	<p>No change</p>

<p>access to the hospital, and fire engines up A23 from Salfords. The commercial estate proposed at Balcombe Road, Horley, and the additional housing South of Reigate and East of Redhill, as well as the houses to be constructed in NW sector of Horley, will all make this worse. The same applies to A217/Prices Lane junction at Woodhatch. A major re-organisation of both these junctions is required. The Council also has concerns about the Lodge Lane/A23 junction, as it remains extremely dangerous, also about the Cross Oak Lane/A23 junction where the traffic lights cause serious congestion on the A23, a situation which will worsen when the new road to/from the North-west development is added to the junction.</p> <p>We strongly support Policy TAP2, and it should be enforced properly. Parking at hotels and guest houses should be only for people who are actually staying there at the time, or who are present in the hotel for a meal or function</p>	<p>considerable delay), which are likely to require mitigation to facilitate any development in the local area. Park Lane and Chart lane are smaller rural residential roads and were not identified picked up. RBBC and SCC are working together to explore how the road network around these areas can be improved.</p>	
<p>The key issues for the county council, with regard to the current consultation, relate to the implications for the infrastructure provided by the council, especially with regard to our role as the authority for education, highways and transport and minerals and waste planning. We also have an interest with regard to heritage protection.</p> <p>On the issue of transport, saved Borough Local Plan 2005 Policy MO1 provides for the safeguarding of highway land outside the highway boundary for highway improvements to improve the road network in Reigate Town Centre. These improvements are indicated on the Reigate Town Centre inset map of the Borough Local Plan 2005. We consider that the safeguarding provision should be carried forward in the Development Management Plan. This reiterates our letter dated 16 April 2012 in response to the consultation on the</p>	<p>The land for this highways scheme has been protected by policy designation MO1 since the adoption of the Borough Plan in 2005. This policy designation is "saved" indefinitely until we replace it with a new policy or plan. Whilst your response indicates that you would prefer this designation to be carried forward, there appears to be no firm plans by SCC, nor clear indication that SCC has plans to take control of this land under its CPO powers in order to carry out such road improvements. Neither is there any indication in SCC's Transport Plans that such a scheme is planned.</p>	<p>Policy INF1 amended to include this.</p>



Proposed Submission Core Strategy and Draft Infrastructure Delivery Plan. These proposed road network improvements accord with the Core Strategy objective SO17 to ensure the continued vitality and viability of Reigate town centre and align with policies CS12 Infrastructure Delivery; CS 7 Town and Local Centres and Policy CS17: Travel Options and Accessibility.

We have consistently expressed concerns as the Waste Planning Authority, in response to previous consultations, regarding the allocation of the former Copyhold site for non-waste related development, as this would be in conflict with the adopted Surrey Waste Plan 2008. However we recognise that the broad location for the urban extension, which includes the Copyhold site, is already identified in the Local Plan Core Strategy. Nevertheless, we would strongly emphasise the current and ongoing need for waste management facilities in this part of the county and expect the district and borough to work proactively with the county council to ensure that areas in appropriate locations for additional waste management facilities can be identified and delivered. In addition, any proposals for future residential development on the Copyhold site will need to address the potential impact on the efficient operation of the adjoining Patteson Court waste management site with the inclusion in the Plan of suitable mitigation measures. These measures are set out in the annexe to this letter.

INF1 - It is important that the Borough acknowledge the fact that waste management is essential infrastructure to support new housing and industry - in the same way as, for example, schools and transport. Hence the county council supports the inclusion of waste management within the term 'infrastructure'

Site allocation Policies ERM2 Former Copyhold Works, and ERM3 Land west of Copyhold Works include policy requirement to consider a suitable buffer zone and mitigation measures to ensure adequate residential amenity on the allocation sites. Policy INF1 amended to include this.

<p>in proposed policy INF1. This will require cooperation with the Waste Planning Authority as it prepares a new waste plan and considers options for the strategic management of waste.</p>		
<p>The Environment Agency encourages growth that can be supported by the necessary environmental infrastructure, for instance water resources and flood risk management provided in a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities. Early investment and careful planning may be required to ensure expanded or improved infrastructure will have the capacity to cope with additional demands.</p>	<p>Noted. DMP policies INF1 and relevant site allocation policies ensure that such infrastructure is provided when needed.</p>	<p>Policy INF1 has been amended to include reduction of risk of sewer flooding.</p>

SITES

SITE ALLOCATION PROCESS		
<p>Whilst recognising the need for mixed housing overall, some boroughs are better placed geographically and logistically for large developments. Reigate &amp; Banstead is not</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>In order for the Council to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2</p>	<p>No change</p>

	<p>Technical Reports) have been undertaken to identify possible sites. The methodology used have been assessed through the adopted Core Strategy process. It is felt that these sites are the most appropriate sites to be released taking account of factors such as availability, assessment of constraints, sustainability and Green Belt impact. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>Does this release of green belt for housing just pave the way for more? What's to stop the council from thinking that it's an easy option in the future?</p>	<p>This comment has been noted. National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land</p>	<p>No change</p>

supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options. The Council's role is to balance needs (housing, employment etc) with protecting the built and natural environment and quality of life of those living, working and using the borough. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.

Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and

	<p>special character of historic towns; and to assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>Adopted housing target is a minimum, in line with Inspector's report into CS examination - Local Planning Authority needs to ensure that it is securing the delivery of development potential and securing the delivery of Sustainable Urban Extensions, in order to meet not only their housing targets, but their full Objectively Assessed Needs (OAN) as well as significantly boosting the supply of housing as set out in the NPPF. It is also worth noting that the evidence base supporting the Core Strategy and OAN is now some three or four years old and so should be updated as soon as possible.</p>	<p>Delivery of at least 460 homes per year is in line with Policy CS13 of the adopted Core Strategy, which sets the spatial strategy that the Development Management Plan seeks to deliver. Case law (Oxsted Residential and Tandridge District Council, Gladman Development and Wokingham Borough Council) makes clear that where there is an adopted core strategy, a subordinate DPD can be prepared in conformity with that core strategy. In addition, the Core Strategy states that "Review of the Core Strategy will commence within 5 years of its adoption date to ensure that the overall spatial strategy and accompanying policies remain up to date and robust."</p>	<p>No change</p>

<p>As far as housing is concerned the housing goal for Area 1 in the Core Strategy seems impossible to achieve. The DMP does not explicitly say, even in principle, how the deficit of 410 new homes is to be met. In every day terms this would be equivalent to a community the size of Burgh Heath.</p> <p>It has been argued that the collection of approved but unused planning applications in Area 1 provides evidence of land sufficiency. There must be regulations that help to ensure that planning applications are used and not simply treated strategically; if they were not, pressure would simply build to create a need for urban extensions. One regulatory scheme could involve revocation if the project were not completed within, say, 3 years, with no new application considered for say, 10 years.</p>	<p>It is unclear where the deficit figure of 410 new homes has come from. The Core Strategy outlines a requirement for 930 homes in Area 1 between 2012 and 2027. The most recent Housing Monitor (2017) clarifies that there has been a total net gain of 593 new homes in Area 1 from 1 April 2012 up to 31 March 2017. This gives a current deficit of 337 in the north of the borough, to be provided by the end of the plan period. The Development Management Plan allocates some potential sites in the urban area, the rest will be delivered through windfalls.</p>	No change
<p>Better use of the buildings we have currently have, either they are commercial or get changed to a residential, rather than sitting empty - this would cover the housing quota. Build more around existing towns/shops rather than pushing further out into the green areas.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land. There are also permitted development rights which allow conversion from office to residential without a full planning application.</p>	No change

However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.

The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 & 2 Technical Reports) have been undertaken to identify possible sites. The methodology used have been assessed through the adopted Core Strategy process. It is felt that these sites are the most appropriate sites to be released taking account of factors such as availability, assessment of constraints, sustainability and Green Belt impact. For specific details on these sites please see the before mentioned reports.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.



<p>We object to PS3 as, whilst we support the allocation of sites for development, we do not believe that achieving consistency with the Core Strategy is the best approach as we are of the opinion that the housing requirements within the CS are not accurate and are not based on robust, up-to-date information. It is advisable that the Council either seeks to update their housing requirements or at least produces an up-to-date SHMA which can then inform the allocation of sites. The DMP will be a crucial plan for the delivery of development within the borough however we are concerned that by achieving consistency with the CS, this will lead to a substantial under-delivery of housing against updated housing requirements. As a result of this, we cannot support this approach in its current form.</p>	<p>Delivery of at least 460 homes per year is in line with Policy CS13 of the adopted Core Strategy, which sets the spatial strategy that the Development Management Plan seeks to deliver. Case law (Oxsted Residential and Tandridge District Council, Gladman Development and Wokingham Borough Council) makes clear that where there is an adopted core strategy, a subordinate DPD can be prepared in conformity with that core strategy. In addition, the Core Strategy states that "Review of the Core Strategy will commence within 5 years of its adoption date to ensure that the overall spatial strategy and accompanying policies remain up to date and robust."</p>	<p>No change</p>
<p>Any 'development' plan ought to focus on the LOCAL people, not bringing in more from the outside. Objectives should therefore be very modest. Conserve and protect, rather than 'develop', and not be guided by revenue and other financial motives.</p>	<p>The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base. The generation of planning policy is independent from other departments in the Council, and uses the evidence base to create objective policies</p>	<p>No change</p>
<p>The current proposals demonstrate a lack of a cohesive approach when considering the development pressures within the Borough and the need to ideally allocate specific sites to deliver to meet these needs. Certain proposed uses may be acceptable on sites that would be otherwise unacceptable for other uses, however this does not appear to have been assessed in any specific detail despite evidence from the call for sites for land uses.</p>	<p>The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base.</p>	<p>No change</p>

<p>There are potentially many much smaller sites that could be developed that would distribute housing across the borough more evenly - be they in size, budget etc and ultimately having less impact on immediate infrastructures. Using land for large developments built on covered over streams and fragile soil is not future proof. These developments are not built to last. This is a legacy future generations will have to live with and ultimately rectify.</p>	<p>The National Planning Policy Framework (NPPF) requires local planning authorities to identify a supply of specific deliverable sites for the first five years of the plan period (including a relevant buffer) and identify a supply of specific developable sites or broad locations for growth for years 6-10, and where possible, for years 11-15.</p> <p>Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year. The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. In addition, the Housing and Economic Land Availability Assessment (HELAA) identifies sites which are being promoted for development with a capacity of 5 units or more. As part of the plan evidence base, the aim of the HELAA is to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet housing and economic needs over the plan period, across the borough.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of land outside urban areas. This will only come forward if the Council can no longer demonstrate a 5 year housing supply.</p>	<p>No change</p>
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<p>The minimum number of residential units that Banstead is to provide is 180 over the plan period. The identified sites identified by the LPA are heavily constrained for instance by flooding and issues of site assembly, and apart from KBH1, will not become available until at least years 5 to 10 of the plan period. If other, or better, sites had potential in the built up area to provide the minimum housing required, then they would be identified in this document. The fact that they haven't strongly suggests that they don't exist, and this on the basis of housing figures that fail to meet objectively assessed need. Because all development is directed to the built up area, or the town centre and then out of centre locations, existing settlements are in the worst position to provide the new development that will be required. This is because all forms of development are competing against each other for the same finite supply of sites, but the sites cannot be provided as the greenbelt prevents the built up area being increased. This site allocations therefore will act as a brake on the supply of land for housing not as a smooth acting delivery mechanism to meet housing need. The only way this can be altered is by expanding the settlement boundary of Banstead to incorporate contiguous sites and allow them to deliver the development that has been allocated to the settlement and to contribute towards meeting identified need.</p>	<p>The Core Strategy outlines a requirement for 930 homes in Area 1 (north of the borough) between 2012 and 2027. The most recent Housing Monitor (2017) clarifies that there has been a total net gain of 593 new homes in Area 1 from 1 April 2012 up to 31 March 2017. This gives a current deficit of 337 in the north of the borough, to be provided by the end of the plan period. The Development Management Plan allocates some potential sites in the urban area, the rest will be delivered through windfalls.</p>	<p>No change</p>
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<p><b>Banstead:</b> We do not have the detailed information to make reasoned comments on most of the sites proposed but remain concerned at the lack of infrastructure and services to support the proposed new communities in the urban extensions. We also have reservations on the redevelopment of so many small commercial sites with a range of manufacturing, service and community functions. At a time of increasing population, it is important to retain youth, library, community centres and private as well as public recreational facilities and, where appropriate, plan for more.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p> <p>The site allocations do not propose loss of manufacturing, service or community functions.</p>	No change
<p>Burial, development sites, gypsy and traveller sites obviously all require but location should be consulted on</p>	<p>No burial sites are being proposed as part of the DMP. Development sites and gypsy &amp; traveller sites are being consulted on</p>	No change
<p>Office space: There are so many office buildings in the surrounding areas that have been dormant for many many years. I think these should be looked at with a view to potential residential development. This appears to be quite a topic for discussion in the area. I understand that there are approximately three thousand homes in the surrounding areas that could be filled. If that's so, why provide this extra and unneeded accommodation in beautiful unspoilt green belt countryside?</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land/convert their buildings. There are also permitted development rights which allow conversion from office to residential without a full planning application.</p>	No change

	<p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. The methodology used have been assessed through the adopted Core Strategy process. It is felt that these sites are the most appropriate sites to be released taking account of factors such as availability, assessment of constraints, sustainability and Green Belt impact. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>council's default position should be against new development. There are plenty of 'developers' who would be delighted to concrete over the whole borough to make money for themselves.</p>	<p>The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base. The generation of planning policy is independent from other departments in the Council and developers, and uses</p>	<p>No change</p>

	the evidence base to create objective policies	
Cross-boundary issues may arise in the area around Horley and Meath Green where the villages of Charlwood and Hookwood are adjacent to the MVDC/RBBC boundary. There has been a history of flooding in this area and MVDC trusts that Reigate and Banstead will take this into account when bringing sites forward for development. MVDC are pleased to note that a sequential test for all potential development sites have been carried out in the Draft Sequential Test for flood risk: Potential development sites document.	An up to date Strategic Flood Risk Assessment Level 1 has been prepared in conjunction with Mole Valley and Tandridge to support the DMP and this provides up to date flood modelling, which takes account of climate change allowances. A Level 2 has also been undertaken on the individual sites and the site allocations require appropriate mitigation.	No change
Each site to be considered on its merits with consistent focus on town centre	This is the approach set out in the adopted Core Strategy and in the DMP - any site allocations would still require a planning application	No change

<p>The Council should commission the production of a new SHMA which has regards to updated household projections. The existing SHMA which forms a key part of the policy evidence base, is based on the 2008 population projections and there have been three cycles of updated projections since these. Whilst we acknowledge that this plan is not a strategic policies plan, we are asked to comment on allocated sites and the consistency with the Core Strategy.</p> <p>The current housing requirements as set out within the Core Strategy are 6,900 dwellings over the plan period which equates to 460 dwellings per year. These current requirements do not take into account the increasing population projections and the anticipated increase in out-migration from London. As an authority with excellent transport links into London and its close location to London boroughs, Reigate and Banstead will increasingly become an attractive place to live for people who can no longer afford to live in London and wish to move further out. We do not believe that the Core Strategy in its present form acknowledges these increases and the subsequent increasing housing need for the borough.</p>	<p>Delivery of at least 460 homes per year is in line with Policy CS13 of the adopted Core Strategy, which sets the spatial strategy that the Development Management Plan seeks to deliver. Case law (Oxsted Residential and Tandridge District Council, Gladman Development and Wokingham Borough Council) makes clear that where there is an adopted core strategy, a subordinate DPD can be prepared in conformity with that core strategy. In addition, the Core Strategy states that "Review of the Core Strategy will commence within 5 years of its adoption date to ensure that the overall spatial strategy and accompanying policies remain up to date and robust."</p>	No change
<p>Growing a prosperous economy is a laudable aim. This could be supported by the Borough Council seeking to meet their Objectively Assessed Needs by significantly boosting the supply of housing by allocating more housing sites. By allocating 'greenfield' sites viability issues will not suppress the supply of affordable housing in the Borough the need for which is acknowledged as being significant.</p>	<p>Delivery of at least 460 homes per year is in line with Policy CS13 of the adopted Core Strategy, which sets the spatial strategy that the Development Management Plan seeks to deliver. This seeks to balance necessary growth with protection of the built and natural environment and quality of life of those using the borough.. The identified sites have been identified to meet this target.</p>	No change

<p>Having seen the South Park and Woodhatch development plan a degree of thought has been given to this and we would like to think that local opinion would continue to be sought should a specific area be taken forward to development stage</p> <p>Responding to the specific South Park/ Woodhatch area development there is already a need for additional parking at the local shops and the increased use of the YMCA in Slipshatch Road (where the Driving Standards Agency is located) gives rise to significant traffic congestion with the potential for a serious or fatal collision involving minors If we are to encourage local businesses to thrive in the future consideration needs to be given to access, parking and attractable and affordable rates to attract and retain new business to the area.</p>	<p>Regulation 19 will allow any further comments to inform the Development Management Plan. Any site allocations will still need to be subject to a planning application which will provide further opportunity for local comments.</p> <p>The site allocations would require the proposed sites in woodhatch to integrate and to reduce impact on the local area. For example SSW2 requires:</p> <ul style="list-style-type: none"> <li>• Enhancements to local community provision</li> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> </ul>	<p>No change</p>
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	Business rates are not something the Council can control	
Assume that the 185 houses in Horley between A217 and A23 are south of the recently constructed ring rd	Proposed sites in Horley comprise SEH4 (east of the Close), NWH1 (north of the North West sector) and NWH2 (west of Bonehurst Road).	No change
many flats have been created in Horley with little or no parking. The excuse was that there was a large park close at hand. If we are to develop one or all of the car parks we MUST first provide replacement parking.	Noted. Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .	No change
The urban spread of Horley is restricted to the south by the airport, to the east by the M23 and the flight path and to the north and west by the green belt. The north and west are too far from the town centre and the railway station. Options are therefore limited. The challenge is to protect the area's semi rural nature, protect its environment (woodlands and wildlife) while still providing new homes to allow for natural growth (both my sons have had to move out of the area). My view is our biggest hope is close cooperation with Gatwick and to feed off all its potential growth.	Noted - the adopted Core Strategy and the DMP seek to balance growth with the protection of the built and natural environment and quality of life of those using the borough.	No change

<p>Horley is a small semi rural town, it doesn't need expanding.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year. This is set out in the adopted Core Strategy which identifies that around 900 homes should be provided to the south of the borough within the urban area and up to 200 homes may be required in the Rural surrounds of Horley.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>In order for the Council to deliver the target there may need to be release of a small amount of Green Belt.</p>	<p>No change</p>
<p>I agree with the basic need for development, though I worry the London area is too dominant.</p>	<p>Noted</p>	<p>No change</p>
<p>I couldn't find any information on the new secondary school mentioned in the DMP? Please can we have more on this and the potential sites? What guarantees are there in place with developers so the new primary schools will be built?</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p> <p>ERM 2 site allocation has been updated as follows: •</p>	<p>No change</p>

	Education/Community: Serviced land set aside for a new two-form of entry primary school the need for which will be reassessed prior to submission of a planning application. If land is not needed, the need for an alternative community facility must be tested.	
East Surrey Hospital (and other medical facilities) - has the impact of the increased population following the house stock increase been investigated? Can they cope? Why only 1 new medical centre planned (for Woodhatch)?	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p> <p>The site allocations do not propose loss of manufacturing, service or community functions.</p>	No change
I think sites should be small scale, not large like Sandcross Lane/Slipshatch Road/Whitehall Lane	Larger scale development enables the Council to require more joined up infrastructure improvements to be delivered up front and more justification for provision of things like community facilities. There are a number of smaller scale sites proposed as well across the borough.	No change

<p>I understand that green belt sites are earmarked for possible development lie outside reasonable walking distance from most public amenities, hence likely creating more traffic on the roads, more parking congestion and all the well-known deleterious health effects of car-dependency in people and for society at large. not to mention climate change and the health of wildlife.</p>	<p>The adopted Core Strategy identified Broad Areas of Search for release of development as urban extensions. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. The methodology used have been assessed through the adopted Core Strategy process. It is felt that these sites are the most appropriate sites to be released taking account of factors such as availability, assessment of constraints, sustainability and Green Belt impact. For specific details on these sites please see the before mentioned reports.</p> <p>The individual site allocations require mitigation such as enhance bus facilities and improved pedestrian and cycle routes.</p>	<p>No change</p>
<p>I would like to think that the consideration has been taken into the positioning of new developments so that they are not affected by flooding or climate change, however looking at some other areas local to the borough such as smallfield and the Cross Oak Lane building developments this has been ignored during the planning stage. these areas are often flooded when we have inclement weather.</p>	<p>A Strategic Flood Risk Assessment has been prepared to support the DMP and this provides up to date flood modelling, which takes account of climate change allowances</p>	<p>No change</p>
<p>In an urban area like Redhill the Council should seriously look at building good quality well designed housing that is more higher rise than current in the area. This would make better use of the available land and would bring more jobs and people to the area. Towns like Croydon and Sutton have already done this and this has improved the housing stock of these areas</p>	<p>Policy DES4 seeks to support tall buildings where these are appropriate. As part of this, it identifies areas in Redhill which are most suitable for taller buildings, given Redhill is the most suitable town for taller buildings.</p>	<p>No change</p>

It is necessary to allocate sites to avoid ad-hoc and unplanned development which may not be consistent with sustainable principles and planning by appeal.	Comment is noted	No change
It is submitted that the Borough Council should not limit their future land supply to just 460dpa but increase this to reflect the OAN for the Borough	Delivery of at least 460 homes per year is in line with Policy CS13 of the adopted Core Strategy	No change
Key words: "across the borough" - at present it seems to be anywhere but Reigate!	There are three urban sites identified in the DMP within Reigate and four urban extensions to the south of Reigate.	No change
Local people don't want any more houses	This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate & Banstead Borough Council has an adopted housing target of 460 dwellings per year.	No change
Keep it in South Park and Dovers Green where it's less controversial.	The adopted Core Strategy identified Broad Areas of Search for release of development for Sustainable Urban Extensions. Further works (Sustainable Urban Extensions Stage 1 & 2 Technical Reports) have been undertaken to identify possible sites. Site are proposed in south Reigate, east Redhill, Merstham and Horley. It is felt that these sites are the most appropriate sites to be released based on assessment of constraints, sustainability and Green Belt impact. For specific details on these sites please see the before mentioned reports.	No change
Make full use of/use to full capacity brownfield sites and areas which have some form of development to avoid building on green belt/undeveloped land where possible	This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate & Banstead Borough Council has an adopted housing target of 460 dwellings per year.	No change

The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.

In order for the Council to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.

The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 & 2 Technical Reports) have been undertaken to identify possible sites. The methodology used have been assessed through the adopted Core Strategy process. It is felt that these sites are the most appropriate sites to be released taking account of factors such as availability, assessment of constraints, sustainability and Green Belt impact. For specific details on these sites please see the before mentioned reports.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be

	altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. No change	
Not at the expense of people's quality of life- there is a housing crisis.	Noted - the adopted Core Strategy requires the Council to deliver at least 460 homes per year.	No change
Provided the Core Strategy isn't the ignored by planners when making decisions.	Planning applications will be considered in line with adopted planning policies.	No change
Redhill and Merstham: Although we objected strongly to the loss of Green Belt at the Core Strategy stage, we accept that, if the 5 year target is to be met, it is better to develop land which does not perform well in terms of the 5 Green Belt functions than lose more sensitive areas of open countryside to development.	Noted	No change
Residents of Nork have had to put up with the inconvenience and other negative impacts of multiple developments being worked on constantly over the past 5-10 years, surely it's time for the latest Development Management Plan to focus new development on other areas within the Borough ?	The Development Management Plan suggests site allocations across the borough, including potential urban extensions in Redhill, Merstham, South Reigate and Horley	No change
Royal Mail has a statutory duty to provide efficient mail sorting and delivery services within the borough of Reigate and Banstead. This service is currently provided from the following freehold and leasehold Royal Mail properties: <ul style="list-style-type: none"> <li>• Banstead Delivery Office</li> <li>• Tadworth Delivery Office</li> <li>• Horley Delivery Office</li> <li>• Redhill Delivery Office</li> <li>• Reigate Delivery Office</li> <li>• Redhill St Anne's Drive Vehicle Park</li> </ul>	The Royal Mail site in Redhill and Horley have been removed from the DMP. However, the Reigate Royal Mail site has been submitted to us as part of the SHLAA process and it is understood that this is likely to come forward, so this has now been included	No change

<p>Royal Mail has confirmed there are no plans to relocate from any of the above properties in the foreseeable future.</p> <p>The Redhill Delivery Office site at Redstone Hill, Redhill -</p> <p>Royal Mail have reviewed their operational property requirements and it is confirmed that this asset will not be forthcoming as a potential redevelopment site.</p> <p>We ask that Reigate and Banstead Borough Council amend their draft Development Management Plan to delete all references to this site as a potential redevelopment site.</p>		
<p><b>Scale of sites</b> - More smaller sites are better than larger ones</p>	<p>Larger scale development enables the Council to require more joined up infrastructure improvements to be delivered up front and more justification for provision of things like community facilities. There are a number of smaller scale sites proposed as well across the borough.</p>	<p>No change</p>
<p>Some land is identified for housing provision but no mention of strengthened services to support them. I am think of additional highways, electricity and gas supplies, plus sewerage and surface water drainage capacity plus schools. Additionally local and hospital based healthcare must be factored in. All these services are all the responsibility of other third parties.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan and the Transport Assessment on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p> <p>The site allocations do not propose loss of manufacturing, service or community functions.</p>	<p>No change</p>
<p>The adopted Core Strategy set a housing target of 460 dwellings per year. This target was however</p>	<p>An updated 5 year housing supply document was published in March 2017 and confirms a 5.83 years</p>	<p>No change</p>



<p>substantially below the objectively assessed need. The Council's 5 year housing supply document for up to April 2016 seeks to demonstrate that the 5 year supply is met and for that matter exceeded. This is however not accepted. Having analysed the Borough Council's housing supply figures and supporting information it is submitted that the assessed supply has been over estimated and that a figure of 4.66 years is more robust as opposed to the 5.83 years suggested by the Borough Council. In a number of sites relied upon to reach 5.83 years the projects have either stalled and supply will be reduced or are at a too early stage in the process i.e. pre planning to be relied upon. Furthermore there are viability issues relating to a number of sites which will result in lower levels of affordable housing being delivered or none whatsoever.</p>	supply	
<p>Would need to clearly understand each development on a case by case basis</p>	<p>Site allocations in the DMP would still require planning applications</p>	<p>No change</p>
<p>Yes set up sites for the whole borough not justhorley</p>	<p>There are sites proposed throughout the borough</p>	<p>No change</p>

<p>like the Council to clarify: -</p> <ul style="list-style-type: none"> <li>- the actual need for and timing of development on the proposed sites in Redhill, Reigate, Merstham and Horley some involving different designations and the amount of open space and density envisaged;</li> <li>- what protections there are in reality, including specific and clearly drafted provisions, to ensure the Council and developers have to develop brownfield sites before a release of more Green Belt land is proposed.</li> <li>- where adequate "buffer zones" are going to be left between any development and the surrounding countryside as this can be difficult to achieve without the help of specific policy provisions as we found in Tadworth, even near common land.</li> </ul>	<p>The need for the developments is driven by the need to meet the housing target for the borough. The density is indicated in the individual site profiles, where the number of expected houses is indicated. The amount of open space is indicated by Policy OSR2. The phasing policy that ensures greenbelt sites are only released when the 5 year housing land supply cannot be met is in Policy MLS1. The indicative plans for the urban extensions shows where buffer zones might be located, though the actual location would be a matter for a planning application.</p>	No change
<p>We note that there is a requirement in the CS for 500 - 700 dwellings yet the 5 sites yield only 455 so question whether there is much flexibility even though we are informed that no decision has been made on which sites the Council will progress. Perhaps this is because sufficient brown field land is identified for development?</p> <p>It is essential that there is a clear sequence of programmed development and infrastructure, with back ground work on the early sites sufficiently advanced to be brought forward quickly if required and other Green Belt sites are not to be lost.</p>	<p>The Core Strategy notes that the figure of 500 - 700 is an indicative capacity and is an "up to" figure. The amount of housing delivered by the sites in question is expected to be added to by urban brownfield sites, and other urban extensions. The point in the second paragraph is noted, and development on this sites will progress in an organised manner as and when it is understood to be needed.</p>	No change
<p>'Place Shaping' Theme - does not set out clearly what is meant by these words. We propose that explanatory text, and a policy setting out the key principles for successful place shaping, are included at this point.</p>	<p>Although it is felt that a separate policy on the principles of place shaping would not be helpful, as it would replicate the requirements of many of the other policies in the DMP, it is noted that a brief introduction to the term may be useful.</p>	No change

<p><b>Community assets</b> - We are very concerned that the DMP focuses very much on development on and (in Banstead’s case) on and around community assets owned by the Council or Surrey County Council (“SCC”). We are aware of the Council’s publicly stated intention of setting up an “independent” development company and we feel this and the DMP should be entirely separate both now and in the longer term. These assets are very important to the local communities.</p> <p>We feel that there needs to be much more discussion about this and exactly what will replace these facilities. The DMP provides, among other uses, for housing or defaults potentially to housing or is simply unclear. We are all aware that housing is needed particularly affordable and starter homes. Affordable housing only constitutes about 25% of the houses on the newly redeveloped Council/ SCC owned Preston Housing Estate in Tadworth. Unfortunately, it appears residential user is of more value economically to developers and, in some respects, the Council (through infrastructure and other contributions) than offices and other uses that the community might feel are more appropriate and put less strain on an already overstretched infrastructure.</p>	<p>The importance of these community assets is noted. Any redevelopment of these assets must take place in a sensitive manner, and will generally only take place where a replacement location for the community facilities has been identified, or where the community facilities can be replaced on the redeveloped site itself. Any independent development company would be exactly that - independent, and therefore unconnected to the process of allocating sites through the DMP. Many of the proposed allocations in the DMP are for mixed use sites, which would combine housing with leisure, retail, office or community uses - thus providing the uses required or thought appropriate by the community while also allowing sites to assist in reaching the Council's housing target.</p>	<p>No change</p>
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<p>The DMP considers low, medium and high density as 20, 30 and 40 dwellings per hectare respectively. However, the latest Reigate and Banstead Housing Monitor shows this as conservative, with 42% of homes built and 64% permitted having higher density than the 'high' density in the plan. If the definition of high density was increased, at least to reflect current delivery rates, it could result in more sites being in the plan than needed. The change in parking requirements need not affect this deliverability, should a policy on undercroft parking be added as noted above.</p> <p>Some of the higher density areas (such as in central Reigate) are for roads with terraced housing. This should be considered, as an option for master-planning which (for the sites illustrated) appears to be of relatively low density (20-40 dwellings per hectare).</p>	<p>The point is noted, and on urban sites a higher level of density may be expected. However, for urban extensions on the edge of an existing urban area, a more suburban density may be appropriate to maintain the character of the area.</p>	<p>No change</p>
<p>Planning up to 310 new homes in East Redhill (in and near the present Copyhold site) will put pressure on roads and lanes in the Tandridge district, including parts of South Nutfield. We can expect traffic volumes to increase considerably in Fullers Wood Lane, Clay Lane and around Redhill Aerodrome, as residents of new housing seek to avoid road congestion in a busier Redhill when driving to Horley or Gatwick. These impacts will need to be mitigated by good public transport links, cycle and pedestrian routes to Redhill train and bus stations.</p>	<p>This is noted and agreed with.</p>	<p>No change</p>

I hear there's a phenomenon of 'surprise' additions to the housing stock which come from unexpected places, such as large houses getting split up into smaller flats, but that these can't be factored in under the new requirement to have a five-year housing allocation rather than a yearly target. Since you've failed to challenge or adequately explain the stated need for 2,300 new homes to be built over the next five years, then I presume you should undertake to research the possibilities for these small additions, possibly via a public consultation of some kind. Also I hear that sites of 5 homes or under are not included in the plan, despite the fact that these could be potentially quite numerous within existing urban areas. Why is this? Could urban developments not be planned with higher densities in mind?

My overall thoughts on this topic are that the 2,300 target is arbitrary and could in fact bring about a self-fulfilling prophecy - the houses being built are then snapped up simply because they are there, and likely not going to local people but to outside investors or city commuters with inflated salaries. It seems that some intervention in the housing market to control rents and outrageously high mortgages would be a far better solution to the housing crisis than simply building more places that even people in full-time work can't afford to live in. It's outrageous but predictable that this problem of human social relations should be 'outsourced' in the form of yet more abuse for the long-suffering plant and animal species in the other-than-human world. It would be much better for us to get our own 'house' in order, so to speak ...

The borough's housing target has been decided through an agreed methodology with the national government, and the housing target that Reigate & Banstead must meet is actually notably lower than the figure that methodology calculated - the Council argued, and the government agreed, that due to constraints such as the large amount of green belt in the borough, the original target was unmeetable. Local councils are not able to intervene in the private rent market to control rents or prices - this would require coordinated, strategic action from the national government. It is unclear what kind of public consultation is envisaged that would determine the number of 'surprise' or windfall additions to the housing stock.

No change

<p>I understand that some areas of green belt must be earmarked for development if we fail to provide other areas to meet our requirement for 460 new homes per year. However we should NOT take these areas out of the green belt UNTILL they are needed.</p> <p>Taking them out now but saying that the green belt policy still applies is, I consider, dangerous. I can see some clever developer with much more expensive lawyers than we can afford challenging this policy on land that he owns. We only need to be a couple of houses short (even if we are going to catch up) and we will lose. Much more secure if the areas are till in the green belt.</p>	<p>The point is noted, but this is not really a viable option - changes to greenbelt boundaries must be made during the plan making process. If the land is not removed from the greenbelt at this point, it cannot be removed until the end of the plan period in 2027. In this scenario, if the Council falls short of the 5 year housing land supply, planning by appeal would take over, and developers would potentially be able to build on less suitable parts of the greenbelt, rather than on the sections of greenbelt that are being proposed for removal.</p>	<p>No change</p>
<p>Has an investigation been undertaken on the areas of Reigate, Tadworth and Banstead checking on their suitability for housing development and are they taking their fair share of all types of housing, both low and high density?</p>	<p>A significant amount of evidence has been accrued throughout the plan making process to ensure development is being located in the most appropriate places and at suitable numbers.</p>	<p>No change</p>
<p>Allocate sites for development close to existing transport links, i.e. existing railway stations</p>	<p>Noted and agreed.</p>	<p>No change</p>
<p>Not clear what the sustainability principles are</p>	<p>A number of sustainability principles are set out in the Sustainability Appraisal to the plan.</p>	<p>No change</p>
<p>not if they fail to meet the criteria of being vital to the boroughs needs, or in flood risk areas</p>	<p>Noted</p>	<p>No change</p>
<p>Nothing should be allocated in advance so not to give developers any advantage. The council should take each case on its merits and have local people's interests uppermost</p>	<p>The process of allocating sites allows the Council to identify areas that are more appropriate for development, and provides certainty for the national government that our housing target will be met.</p>	<p>No change</p>

<p>Of particular concern is the impact on traffic on the A25 between Nutfield and Redhill. I would like to formally ask for a reassessment of the problems on the A25 of any future development within the area.</p> <ul style="list-style-type: none"> <li>- Taking note of the dangerous bends around the site of any proposed development on an already over populated area</li> <li>- The possible impact of a future school of the danger and level of traffic in that area</li> <li>- The impact on that part of the A25 area when there is an accident or blockage on the M25</li> </ul> <p>The current speed that a large number of cars and lorries are doing around that area, which has considerable traffic from the land fill area</p> <ul style="list-style-type: none"> <li>- Provides photographic evidence</li> </ul>	<p>The point is noted, and an updated transport assessment has been undertaken. The potential impact on traffic flow on the A25 has been considered, and it is believed that it is possible for development to go ahead without major negative consequences. Specific design issues would be considered when a planning application comes forward.</p>	<p>No change</p>
<p>Only if those principles are transparent and obvious to all.</p>	<p>Noted.</p>	<p>No change</p>
<p>Providing these are located without impacting on current high traffic loads, or significantly improving our road network.</p>	<p>Noted.</p>	<p>No change</p>
<p><b>PS3</b> - Importantly, however, we question whether the housing policy requirement set out in Policy CS13 conforms with the guidance set out in the National Planning Policy Framework (NPPF) (paragraphs 47 and 159, in particular) and the Planning Practice Guidance (PPG). The Council's SHMA was last updated in 2012. Whilst the Core Strategy was adopted 'post-NPPF', in 2014, the Inspector in his report identified some concerns relating to the evidence base available and to the level of housing provision proposed. The DMP should seek to "maximise" opportunities for increasing housing delivery in the borough, recognising that the</p>	<p>The Council believes that the housing target set in the Core Strategy is up-to-date and compliant with national policy, and is the correct basis for the DMP to work from. It is also noted that at the time of writing, the Council can demonstrate a 5.83 year housing land supply, and has identified a number of other urban brownfield sites in the DMP allocations, which will allow the Council to maintain a five year housing supply for at least some time to come. Consequently, the phasing approach of Policy MLS1 is felt to be more correct than the immediate release of greenbelt land for development.</p>	<p>No change</p>

housing requirement in the adopted Core Strategy is a minimum figure. Furthermore, if not exceeded, there will be a substantial shortfall against the evidence of objectively assessed need for housing (OAN) identified through the Core Strategy Examination.

4.9 It is necessary, therefore, for the DMP to release sustainable urban extensions in the short term to help boost significantly the supply of housing in the area. The DMP should make clear that monitoring of the Council's five year housing land supply will be assessed against the minimum requirement and should also take into account more up-to-date evidence of the full OAN in the borough i.e. an up-to-date SHMA.

4.10 Gallagher Estates fully supports the preparation of the DMP document, as opposed to undertaking a review of the Core Strategy, subject to a clear statement within the DMP does not address the full OAN and that the delivery of new housing should seek to meet this need, including through the sites allocated in the document. The preparation of the DMP, as a "daughter document" to the Core Strategy, is an approach which has been supported elsewhere, for example, in West Berkshire and Woking Borough, as discussed below.

4.11 Woking Borough Council (WBC) published the Inspector's Report for its DMP DPD in July 2016. In this case, WBC has produced an up-to-date SHMA which shows this the OAN is significantly higher than the adopted Core Strategy housing requirement. The Inspector was satisfied that the document would serve a useful planning purpose, in identifying sites for various types of development including housing. The Inspector added that paragraphs 14 and 49 of the NPPF provide a



<p>basis for assessing housing proposals (IR; para 20). Extracts from the Inspector's Report are provided as at Appendix 2.</p> <p>4.12 In West Berkshire, the 'Housing Site Allocations DPD' Inspector took a similar position. In response to discussion at the Examination hearings, the Council published proposed modifications to its DPD, clarifying the role of the document. Extracts are provided at Appendix 3.</p> <p>4.13 The translation of this approach, from plan making to decision taking, is provided in an appeal decision for Stanbury House, Spencers Wood in Wokingham Borough. In particular, we draw the Council's attention to paragraph 24 of the Inspector's Report which states:  "Until the full, objectively assessed needs are qualified by the policies of an up to date Local Plan, they are the needs which go into the balance against any Framework policies. It is at that stage constraints or otherwise may apply. In this circumstances, therefore, the housing requirement of the Core Strategy cannot be said to be up to date in the terms of the Framework."</p>		
<p><b>Redhill</b> - reference to ERM1, ERM2 and ERM3. Maybe the plan should read "to deter development in the Green Belt". surely it would be beter to have a higher concentration of housing in the centre, even if it means building up(high rise). and if green belt has to be developed to be used as amenity space</p>	<p>Sites within the greenbelt are intended to be used as a 'last resort' for when housing opportunities in urban centres have been exhausted.</p>	<p>No change</p>

<p><b>Redhill</b> - The site to the north of the A25 is an old land fill site and next door to Patteson landfill which has planning for another 15 years. The road infrastructure cannot cope as it is never mind with many more properties in the area. The A25 has long queues every rush hour and when there aren't queues the speed of drivers coming down the hill is extremely dangerous, especially the enormous HGVs going to and from the landfill.</p> <p>The trees and field with the sheep are highly valued by the community off Redstone hill and provide some protection against the Biffa site. Most people I know regularly walk dogs, run,cycle along the path there which is also part of the National Cycle Network. Trees are known to clean the air and sometimes the stink from the tip is so disgusting Biffa pump industrial air freshener to try to hide it. This is no place for new homes or a school as you are planning.</p>	<p>The Patteson landfill is, as you have noted, set to close down sometime towards the end of the plan period, and will then be fully rehabilitated. This will provide for open space for the community, and should attempt to deal with odour issues. When a planning application comes forward for the site next to the former landfill, it will need to be demonstrated that odour and traffic issues can be dealt with satisfactorily.</p>	No change
<p><b>Redhill sites</b> - Development sites like the one opposite Redhill station are well positioned. There is little need for a car, with public transport and shops being a short walk away. It is already difficult to park in Redhill, so new development sites need to be close to the amenities that the residents will need. If the common sense regarding GB protection is ignored, the proposed development site at Hillsbrow will overburden Redhill with traffic. The site may look sustainable on paper, but it up a steep hill, and so it is unlikely that residents will want to walk or cycle regularly to and from town.</p>	<p>The points are noted, and access to the Hillsbrow site has been considered, and will need to be considered again when a planning application comes forward for that site.</p>	No change

<p><b>Redhill sites</b> - The three identified 'Sustainable Urban Extension' (SUE) sites to the east of Redhill have high environmental value and should be protected, not built on. These three sites are highly visible, being seen from far and wide. They form part of the landscape feature that runs unbroken to the east, and is elsewhere designated as AONB and AGLV.</p> <p>Also, the proposed sites are not served by regular bus services (frequency along the A25 is limited compared to the A23) and the distance from the train station means that future residents of these areas are likely be car dependant, as evidenced in the walking time map included in Annex 4. Therefore these sites appear to be relatively unsustainable locations according to the criteria listed in Annex 4</p> <p>Finally, the transport assessment for these sites is based on Surrey County Council estimates of expected delay times on the A25 (Redstone Hill) following introduction of the two-way balanced network road layout round Redhill. However contrary to the predicted impacts, the A25 regularly suffers peak-time delays, which sometimes continue past the Tandridge border. The SUEs, if built, would be likely to further exacerbate congestion. In non peak-times, when the mean speed is generally above the 30mph speed limit, these sites may not have safe access.</p> <p>For these reasons, as well as the site specific concerns set out below these are considered inappropriate locations for development.</p>	<p>The sites to the east of Redhill have some environmental value, particularly due to being located close to a Site of Nature Conservation Importance, although they are less environmentally significant than some other sites in the borough. Similarly, while the landscape impact has been considered, the landscape impact here would be less than if the sites were within the AGLV or AONB. The sites are not actually a significant distance from the train station compared to some other options - it is accepted that all urban extensions are likely to be some distance from train stations, as they are, by their nature, on the edge of the urban area. The transport assessment has been updated, and is considered to be accurate.</p>	<p>No change</p>
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<p><b>Redhill sites</b> - Whilst I can appreciate:-</p> <p>a) the need to plan ahead and understand that housing space is being sourced within the town as a priority</p> <p>b) people need houses to live in and an infra structure</p> <p>I am concerned that:-</p> <p>1) the old fullers earth works was supposed to be returned to green belt for a very good reason. It is rural and out of town</p> <p>2) other proposed developments are on green belt land and currently used for recreation and farming purposes, both very valid uses. Green belt is there to protect and provide quality of life to both humans and nature.</p> <p>3) wildlife is abundant, with bluebells, deer, owls, woodpeckers, as well as the more other common wild animals .</p> <p>4) it is all very well planning for walking and cycling routes but the bottom line is that the hill itself deters people from walking and cycling as a usual mode of transport, so that is wishful thinking.</p> <p>5) with only two entrance/exit planned ( as far as I can see) and one of those is decidedly difficult to exit on the brow of the hill, the developments would add to the already heavy traffic noise and pollution we experience, plus the long queues which form going into and around Redhill, particularly morning rush hour. Redhill will loose its identity and parameters with proposed building on this scale, to become another sprawling conurbation.</p>	<p>While the Copyhold Works site is indeed somewhat rural, it is not actually very far from the existing built-up area of town. The purposes of the greenbelt do not actually consider the importance of nature, although it is accepted by the Council that nature and biodiversity should be important considerations when planning development, and this will be taken into account in planning applications, as policies in the DMP require new developments to contribute to the green infrastructure network. Access issues will also be considered in more detail ina a planning application, and it must be demonstrated that access will be safe and not have a large negative impact on traffic congestion.</p>	<p>No change</p>
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<p><b>Reigate</b> - abundance of wild life in these fields is amazing and to think of the damage that would cause is heart breaking. There is already a site of over 1500 new homes being built off the A217 which will cause an enourmous impact on Reigate regarding traffic congestion, schools, hospital attendance etc. Green belt must be protected. Once the land is built on, it can never return. I understand that Mr Blunt promised no building on the green belt until all brown field sites has been used. We don't want all country covered in concrete. Housing on the Sandcross Lane site will completely change the nature of the area. Traffic congestion is already very bad, especially when the school is turning out. Another 500 cars will be intolerable. Our local schools are already overcrowded, and are finding it difficult to cope. You must surely take into consideration the concerns of the people who live here.</p>	<p>The DMP aims to prioritise borwnfield sites before utilising greenbelt sites. Traffic congestion has been analysed in a atransport assessment, and any planning application for these sites would need to demonstrate how they would impact traffic congestion in the area before being permitted.</p>	<p>No change</p>
<p><b>Reigate</b> - crowded small dwellings which exacerbate traffic and parking problems in the town should be avoided</p>	<p>Noted.</p>	<p>No change</p>
<p><b>Reigate</b> - If you take a walk, up Park Lane, from Park Lane East, then take a left turn into the fields behind Priory park. The inevitable spread of housing will ruin the views across the flat landscape (westerly) are ABSOLUTELY THE BEST REIGATE has to offer. I am very worried we will lose them. These views are as good as any Reigate/Dorking offer. The spread of housing albeit gradual, will ruin it.</p>	<p>The housing proposed for this area is south of existing housing, and would appear as infill rather than sprawl. The landscape impact of any development will be considered in detail at the planning application and design stage.</p>	<p>No change</p>

<p><b>Reigate</b> - The areas identified within the Woodhatch area should not be considered for development as there is already massive development taking place to the south of the area which will already have an impact on the locality.</p>	<p>The cumulative impact of different developments has been considered.</p>	<p>No change</p>
<p>the plans are to put as many houses on what appears to be perceived as 'spare bits of land' without a thought of how much traffic, noise and pollution would be created. Building on Green Belt land should not be allowed to proceed - we must protect the environment for generations to come and encourage people to enjoy the peace and quiet instead of making every area a noise zone.</p>	<p>The purpose of the green belt is not to protect the environment, and the decision on which parts of the greenbelt to release have been taken based on which areas contribute the least to the greenbelt purposes. The plans for greenbelt release have been carefully considered through a large evidence base, and are not simply randomly placing housing in convenient locations.</p>	<p>No change</p>
<p><b>RNIB Site</b> - A request to include the new green-belt units on the RNIB Site in the Development Management Plan (or replace the 'up to 500-700 units' still being printed in the DMP document with a lower figure) I am concerned that Merstham/Redhill's greenbelt might still be burdened with the expectation to provide up to 500 units (or up to 700 units), within its green-belt when a large number of units given planning permission on its green-belt during period of the core strategy, may not be counted.</p>	<p>The RNIB site is not included within the DMP because it already has planning permission for development, so there is no need to include it as an allocation for future development. The housing units being built on the site are therefore not included in the DMP targets, but will contribute towards the 5 year housing land supply, which will delay the need for greenbelt land development.</p>	<p>No change</p>
<p>Open spaces close to east Redhill are few and far between. Let us not reduce them further by extensive building to the south of the railway line beneath the Copyhold site</p>	<p>It is unclear what this refers to - areas south of the railroad to the south of Copyhold are in Earlswood, where no development is suggested.</p>	<p>No change</p>

<p><b>South Reigate</b> - I have lived in Reigate for over 16 years and have witnessed a constant increase in traffic to the detriment of getting around the town. With single lane traffic on Cockshot Hill and Bell Street, in each direction, the addition of at least 400 more cars will turn the roads into an almost permanent parking lot at various times of the day. While schools, health centres, etc are in the planning proposals, these are useless unless there is easy access to them.</p>	<p>The point is noted, and an updated transport assessment has been undertaken to assess these issues. It is believed that development can take place without an undue impact on traffic congestion, but this would need to be demonstrated satisfactorily in any planning application.</p>	<p>No change</p>
<p><b>South Reigate</b> - Whilst allowing for the fact that there appears to be a need for more housing in the area, it does seem that South Park and Woodhatch are being overloaded with extra housing. The roads are already gridlocked at rush hour and it seems there has been no provision for the extra traffic that these houses will generate. What provision has there been put in place for taking the extra traffic from 1000 + houses?</p> <p>If the field in Dovers farm is built on and the land on Castle Drive is developed, Castle Drive and Dovers farm access road will become a busy crossroads, completely changing the nature of this green end of Reigate. I expect the air pollution will be over the limit and it will be dangerous to walk or cycle down to Woodhatch, or into Reigate itself. I think the developments should be a lot smaller, and encroaching less on the fields around us.</p>	<p>This is noted, however an updated traffic assessment has been undertaken, and it is believed that development is possible without unduly burdening the transport system further. Specific details will be required if planning applications come forward, and a development must demonstrate that it will not negatively impact on congestion in order to gain planning permission.</p>	<p>No change</p>

<p><b>South Reigate</b> - in practice many of these principals seem to be lost when the commercial interest of developers and their shareholders come into play. I am firmly opposed to development on Green Belt land, or the identification of land that could come out of the Green Belt area. Also I do not understand the need to identify sites where farming is actively undertaken. Surely we should be supporting the farming community given the uncertainty that Brexit will have on our agricultural policy in the future. South of Reigate, Woodhatch, Dovers Green has already seen a number of major developments undertaken i.e. Westvale Park. The local infrastructure will not be able to cope with more development.</p>	<p>The point about developers is noted, but all the DMP can do is provide the right policies to ensure those fundamentals are considered - it then becomes the job of the Development Management team to enforce them as best as possible within the constraints of the housing market. Infrastructure has been considered throughout the DMP process, and it is believed that the current infrastructure, combined with some improvements funded by development, will be able to cope with the additional housing. Areas with farms have been identified as potentially suitable for housing, but the land is privately owned and development will only take place if the owners wish to release the land. In terms of identifying greenbelt areas suitable for development, this is necessary to ensure the borough has the capacity to meet our housing targets, but as stated throughout the DMP, the aim is to focus on brownfield sites in urban areas first and only use the released greenbelt land as and when it becomes necessary.</p>	<p>No change</p>
<p><b>South Reigate</b> - the current proposals do not reflect Objective SC1. Proposed development of land around Sandcross Lane for medium and high density housing places untenable strain on an area which is prone to flooding, borders on valuable green belt and stretches the resources of existing schools, public and health facilities</p>	<p>While it is noted that there is some risk of surface flooding, this does not cover the entire site, and development can be managed sensibly to reduce the risk. The site is itself within the greenbelt currently, but this parcel is felt to contribute less to the purposes of the greenbelt than some other areas, hence the choice to include it. Infrastructure has been considered throughout the DMP process, and it is believed that the current infrastructure, combined with some improvements funded by development, will be able to cope with the additional housing.</p>	<p>No change</p>



<p><b>South Reigate</b> - the distance of these sites from regular bus services (the current South Park provision is a stopping service, and limited frequency) and the train station makes them an unsustainable location for urban extension. Similarly the walking time map included in Annex 4 identifies them as unsustainable locations. These sites should therefore also not be considered for urban extension.</p>	<p>The map in Annex 4 was related to parking provision, rather than overall sustainability per se - it was not intended to identify areas which are definitively 'sustainable' or not. The distance from current transport facilities has been noted, and is unfortunate, but when considered against numerous other concerns, including the comparative value of different areas of greenbelt land, these sites were considered to be some of the most sustainable overall locations for urban extensions.</p>	<p>No change</p>
<p><b>South Reigate</b> - This will impact not only the local community but of course and more importantly the wildlife in this area. I am a keen horse rider and have to use the roads around the proposed site to get access onto the near bridle paths.. even in non-peak times the roads are incredibly busy and dangerous.. introducing this amount of houses would push the traffic levels beyond dangerous, not only for horse riders but all users.</p>	<p>The potential impact on road users has been considered in a transport assessment, which has been updated since the initial consultation. The impact on horse riders is, of course, important in an area with a notable number of equestrian facilities - however, it cannot ultimately override the need to find sustainable locations to help the borough meet its housing target.</p>	<p>No change</p>
<p><b>South Reigate</b> - You suggest that there will be more commercial facilities. There is already a convenience store on Slipshatch Road. Will this not draw people away from these businesses?</p>	<p>It is felt that a single convenience store may not be enough to cope with the number of new residents from the potential urban extensions. However, it is also intended for new development to work side by side with existing businesses as much as possible.</p>	<p>No change</p>
<p>Suggest the focus of the DMP to be on urban development – thus ensuring Redhill, Reigate, Banstead and Horley become residential/commercial and leisure hubs for our community, leaving the Green-Belt to be preserved so existing wildlife habitats can be maintained and enjoyed for future generations.</p>	<p>The focus of the DMP is on urban sites, and it is expected that urban sites be developed first. However, greenbelt sites have been identified to meet housing need if and when there are no longer enough urban sites to meet the housing need set by Government.</p>	<p>No change</p>

<p>The above proposals do not offer sufficient access by alternative transport means (such as on foot, bicycle, bus) to reduce dependency on cars. It currently takes around 20 mins to access these sites by foot from the centre of Redhill, and there is no safe way of crossing the A25 at the top of the hill. For many people this is too far and would increase the use of cars to get into and out of town. There is no bicycle access apart from up the very busy and steep A25 which is unsafe. There is currently a very infrequent and expensive bus option to get to "Hillsbrow".</p>	<p>The site allocation notes that development in this area would require enhancement of footpaths, safe crossing points, and better pedestrian and bicycle facilities. The details of these would have to be included in a planning application when it comes forward.</p>	<p>No change</p>
<p>Tandridge District Council (TDC) acknowledge that this consultation relates to a subsidiary document to Reigate and Banstead Borough Council's (RBBC) adopted Core Strategy. The scope of the document is the delivery of housing set out in that primary plan document and an updated assessment of housing need is not required. It is recognised that the RBBC Core Strategy identified that the borough was unable to meet its housing need in full. However, it is considered that the RBBC Development Management Plan, which includes potential housing allocations on green belt and other land, should explore all opportunities for housing delivery within the RBBC Core Strategy framework. It should seek to meet the identified unmet need if possible and further could examine opportunities to assist with unmet need from adjoining authorities such as Tandridge</p>	<p>It is considered that all opportunities for housing delivery have been considered within the Core Strategy framework, and that the housing figure in the Core Strategy is still up-to-date and accurate, and that there is no scope for meeting additional unmet needs from other boroughs at this time.</p>	<p>No change</p>
<p>The allocation of sites seems to be random with no account taken for accessibility or the congestion that will be caused</p>	<p>The allocation of sites has gone through a careful process of evidence gathering and evaluating, and is not done randomly.</p>	<p>No change</p>

<p>The area cannot support further development it is full and overcrowded, it is already losing its charm.</p>	<p>The Council is required to meet its housing target, so further development is required.</p>	<p>No change</p>
<p>The borough has some wonderful natural and historic assets, along with wide open spaces that we do tend to take for granted, these should be at the for front of any development planning for the future and not be inhibited in any way.</p>	<p>The borough's primary natural and historic assets are not at risk due to this plan.</p>	<p>No change</p>
<p>The Core Strategy allows building on Green Belt land when all other space is used. If we cannot build only on non Green Belt land the number of homes the Government says we must then this number of homes is too large. We will be building homes near railways and motorways and sacrificing farmland and the Green Belt to provide low density luxury homes for people moving into this area rather than the affordable homes local families need.</p>	<p>The housing target is already lower than the Objectively Assessed Housing Need for the area - the Council successfully argued during the Core Strategy process that only a lower number was achievable due to constraints such as the greenbelt. The aim of the DMP is to provide a range of house sizes, not just low density luxury homes.</p>	<p>No change</p>
<p>The Core Strategy is flawed. It's designed to serve the council and it's councillors and not the local community. There are plenty of small unused plots that could be identified all over the borough that can be developed with just a handful of houses that wont affect local communities on a large scale. In turn, this would distribute traffic, the need for school places, GP places etc far more evenly. There's no big profit in it for the developers though which means no big profits for the council.</p>	<p>A number of smaller sites have been identified in the DMP for development. The focus of development will be on these sites in existing urban areas before greenbelt sites are considered.</p>	<p>No change</p>

<p>The DMP is over-reliant on the redevelopment of sites which accommodate existing facilities and services for the provision of new development, and housing in particular, including on council owned land. It is not sustainable development to force the relocation or loss of existing community facilities and services, including green space, including where this will result in re-provision which is less accessible to existing communities and will increase the need to travel. Further, there is no evidence that a number of the sites are suitable, viable and available for development. RBBC should adopt a more strategic approach to the provision of development and give further consideration to bringing forward safeguarded/reserve sites which offer opportunities for sustainable development and the creation of balanced communities, for example as urban extensions. Strategic decisions and allocations which will result in the managed release of Green Belt to facilities this should be made.</p>	<p>Community facilities will be reprovided on site wherever possible, and in cases where this is not possible, development will only take place if a replacement location for community facilities can be found to the Council's satisfaction. It is believed that the current strategy is robust and provides a strategic approach - urban locations will be focused on first, as these are considered more sustainable due to their location on brownfield land close to town centres and public transport hubs. Only when urban sites cannot provide enough housing to maintain a five year housing land supply will the urban extension sites be released, as set out and managed by the phasing process for urban extensions in Policy MLS1.</p>	<p>No change</p>
<p>The majority of the development sites are in the south of the borough, which means all the new traffic generated and trying to get to London or the M25 is channelled through Reigate and Redhill which are already heavily congested at peak times, causing pollution and frustration. What plans are in place to alleviate this i.e. by-passing Reigate town centre and the level crossing, Improving the Woodhatch junction is a joke as this will enable the traffic to join the queue of traffic through Reigate quicker, or it will use Park Lane East to try and avoid it.</p>	<p>The allocated sites for development have been chosen based on a wide variety of constraints and consideration, including flooding, landscape, and transport. A transport assessment has been undertaken, and updated since the previous consultation, and it is believed that the proposals will not unduly burden the transport system. Any planning application would further have to demonstrate that the development would not cause unacceptable impact.</p>	<p>No change</p>

<p>The Plan is based on models that are now fundamentally flawed. The Government no longer has a clear idea of the true housing requirement for the united kingdom. The Core Strategy is based on predictions made in 2004. The predictions for housing requirements stated in the inspector's report were calculated two governments ago and who would have predicted Brexit but Brexit is now a reality.</p> <p>However, if the Government is to deliver on its promises, the levels of immigration will be significantly cut. Therefore the housing requirement for the future will significantly differ from that predicted in the above report. It will take many years before the post-Brexit dust settles and the housing requirement for the future is really known. That throws the whole plan into question. It is absolutely imperative that sacred green-belt land should not be concreted-over and desecrated on the basis of a fundamentally flawed plan.</p> <p>The report does actually mention the 1250 signature petition regarding the proposed building on green-belt, delivered to the Government by Crispin Blunt, and it is clear that the Government poohooed this, saying "local opposition is not in itself sufficient reason to reject a proposal". I find this wholly unacceptable.</p>	<p>It is believed that the housing target is still robust and accurate, despite Brexit - as Brexit has not actually happened yet, and its full effect is still unknown and will remain unknown for some time, it cannot really be factored in to the housing target at this point. It is also untenable for the Council to delay the DMP until such a time as the full effect of Brexit can be quantified. It is worth noting that the green belt will only be built on as and when a five year housing land supply cannot be demonstrated. The issue of petitioning the national government is a matter for the national government.</p>	No change
<p>Sell houses to people who commit to work locally and bring new jobs to local people by creating more work</p>	<p>It is not possible to sell houses to people based on the location of their workplace. However, the DMP aims to provide housing in a range of types and sizes in order to cater for the needs of a range of people - including young couples and local workers.</p>	No change

<p>The request to suggest alternative sites should be restricted to relatively minor sites only, ones which fit in with the spatial strategy. Proposals for major sites could open up a great can of worms, lead to dispute between different communities, and lengthen the coming Inquiry unnecessarily. Observations should be restricted to what is actually proposed.</p>	<p>Noted.</p>	<p>No change</p>
<p>There appears to be a discrepancy between the Core Strategy housing target and the Development Management document figures giving the impression of an under supply. Taking the indicative development scenarios for each site, the identified development sites (including the urban extensions) appear to be capable of providing around 70 per cent of the minimum total of 6900 dwellings identified in the Core Strategy. Crawley Borough Council understand that this difference is explained by sites already with permission or that have been completed since 2012, and that once these are included the supply exceeds the Core Strategy target. It would be helpful if this could be explained in the DM document.</p>	<p>Noted. The housing trajectory provides further information on this.</p>	<p>No change</p>

<p>This will completely destroy the nature of the area . What is especially nasty is that (it appears from the tiny map enclosed) you are propoing to develop land, south of the A25 Nutfield Road, that was previously rejected for development as unsuitable. Why the complete change of direction? Again, this is unacceptable, and the secrecy surrounding this is very suspicious. I realise that you are under pressure to develop, and that some of the land concerned is brownfield. But my opinion is that Redhill (and Horley) is seen by the Council to be a bit of a dump and any development is acceptable; only Reigate and Banstead need to be safeguarded. Your redevelopment plans for Redhill Town Centre are evidence of this.</p>	<p>There is no attempt at secrecy here - all of the details relating to these decisions can be seen in the evidence base of the Core Strategy and DMP processes, available on the Council's website. These set out why certain areas have been considered or chosen for potential development. Redevelopment in Redhill town centre aims to revitalise the town, rather than treat it as a dump; and notable urban extensions are proposed for the outskirts of Reigate, as well as development within the town centres of both Reigate and Banstead.</p>	<p>No change</p>
<p>Town Centre sites where the Council have an ownership should be the focus of any drive for additional housing e.g. Donyings . Future appropriateness of current employment sites need assessing such as Reigate and Banstead Council buildings which could be relocated to modern purpose built site (e.g. Former Mercedes Benz showroom and adjoining sites ) to create an office/residential and appropriate retail environment with both scale and height kickstarting the economic regeneration of Redhill .</p>	<p>A number of the proposed site allocations are owned by either the Council, Surrey County Council, or other public bodies. The point is noted about Reigate Town Hall, and part of the site is being considered for mixed use development, but a full sclae relocation of the Council is unlikely, and the proposals within the DMP should also help with economic regeneration in Redhill (possibly to a greater extent than the relocation of a public sector entity would).</p>	<p>No change</p>

<p>We also have reservations on the redevelopment of so many small commercial sites with a range of manufacturing, service and community functions.</p> <p><b>Section 3B Area 2a Wealden Greensand Ridge Redhill and Merstham</b> - We are concerned at the loss of so many small industrial units and sites containing community facilities, without guarantee that alternative locations can be found. We also have reservations on the loss of part of the public car park at Gloucester Road which is conveniently located. We assume that consideration will be given to locating a travellers' site in the urban extension as it should be possible to identify a site which is sustainable and does not harm the surrounding landscape and amenities of local residents.</p> <p><b>Section 3C Area 2b Wealden Greensand Ridge - Reigate</b> - Again we concerned at the loss of small employment areas without replacement proposals and the viability of replacing some community facilities/ library. We assume that there will be consideration of a potential travellers site in SSW2 as there is scope to provide a sustainable site which will not harm the landscape or local residents' amenities.</p>	<p>On most small commercial sites, the aim is to provide mixed use sites that maintain some employment uses while also providing housing. For community facilities, the facilities must either be replaced on site or in a convenient and accessible location elsewhere, in order for development to go ahead. Travellers sites have been considered for urban extensions, and the conclusions have been included in Policy GTT1.</p>	<p>No change</p>
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<p>We have concerns that planning policies in the DMP do not go far enough in tackling some of the developers' practices of trying to apply for developments as "enabling developments" which do not qualify as such in planning law.</p>	<p>A policy that states that any development which is contrary to the plan policies will likely be rejected would be redundant, and would still not stop enabling development necessarily, as the whole point of such development is that it presents exceptional circumstances. Paragraph 140 of the NPPF states that "Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies." It is believed that this is a sensible approach to take, and is the one that the Council would take in such a situation, with input from the full range of relevant officers.</p>	<p>No change</p>
<p>In addition, in the case of schools (specifically mentioned in the DMP) we wish to see the Council required to see proper proof in terms of say expanding pupil numbers of the need to expand or relocate premises or build on open spaces or playing fields.</p>	<p>This is noted, and any expansion of a school would require evidence to justify it, especially as most school playing fields have been designated as Urban Open Space, in addition to their existing protection.</p>	<p>No change</p>
<p>we note that although no decision has yet been taken by the Council, it appears to us that there is little flexibility as the 3 sites only give 380 dwellings compared to the 500 -700 stated in the Core Strategy.</p>	<p>The Core Strategy notes that the figure of 500 - 700 is an indicative capacity and is an "up to" figure</p>	<p>No change</p>

<p>We remain concerned that the Core Strategy set out what appears to be a sequential process the release of former Green Belt urban extension sites with priority towards sites in Redhill over Reigate. This has not been adequately justified and appears premature given such sites have yet to be allocated and the sustainability, deliverability, need or size of individual sites has not yet been tested. The DMP upon receipt of the appropriate evidence should allocate and release housing sites according to their impact and housing need.</p>	<p>The sites have been tested throughout the DMP process, including in the sustainability appraisal. The DMP does aim to allocate and phase the release of the sites appropriately.</p>	<p>No change</p>
<p>Work on the industrial land between Salfords and Horley instead as this is where new homes are being built and has the least flooding impact.</p>	<p>If the comment is suggesting that new housing should be built in the gap between Horley and Salfords, part of the problem here is the need to respect the greenbelt principle of not allowing settlements to merge. There is also some flood risk in this area.</p>	<p>No change</p>

<p>BAN1</p>		
<p>BAN1: Site BAN 1 is an aspiration at present. The delivery of the site is so uncertain it should be treated as a windfall. Site BAN 1 should be deleted and replaced by other sites contiguous with the settlement boundary and which are available and deliverable.</p>	<p>This is noted, and BAN1 has been changed to an 'opportunity site' rather than a site allocation - it is still believed that the site represents a good opportunity for development, but it is agreed that it is not presently deliverable.</p>	<p>BAN1 changed to 'opportunity area'.</p>

BAN1: This redevelopment will force the closure of Christchurch, which has been a place of worship for many people for many years.	Christchurch has been removed from the suggested site.	Christchurch removed from site.
If the area were re-developed, the proposed 40 housing units would be very welcome. Banstead needs no more shops	Noted	N/A
This proposal would lead to a loss of parking.	Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .	N/A
Proposal would force important community services and businesses to relocate or close - church that has been here since the early 20th century, nursery, bank, clinic, vet, dentist, chiropractor. Community facilities should not be replaced by more housing.	The description of this site notes that there should be 'retention or replacement of existing' facilities. In addition to this, the church site has been removed from the proposed allocation. The borough is required by national planning policy to meet housing need. This proposal will not replace community uses with housing, but will allow the two to complement one another.	N/A
There are already too many empty shops in Banstead, more retail is not necessary.	The proposed development aims to provide a replacement for existing uses and some complementary uses, while also providing housing in the town centre. This will provide the space needed for the high street to continue providing for the needs of local residents, while the additional town centre residents will support some of the existing and	N/A

	proposed town centre retail.	
This area is fine as it is - proposal is unnecessary.	It is important that the Council produces a positive plan that will meet the housing needs of the borough. This proposal will provide some of the necessary housing while also revitalising an area of the High Street.	N/A
Reservations on this proposal as it is unlikely that there is sufficient demand for additional retail floor space in this location. We are also concerned at the loss of useful community and service facilities, and query where these will be relocated. Relocation could also affect their viability. There may be a case for piecemeal development of the area as small, independent shops could be in character with the rest of the centre.	The proposal for this site includes the possible retention or replacement of existing uses. The proposal is for a relatively small amount of additional retail floorspace, which it is believed will help the High Street provide for the needs of residents, especially in conjunction with new residents in the proposed housing. Policy DES1 requires development on all sites to be in character with the local area.	N/A
The properties between The Avenue to the Police station have historically been considered / identified as a possible / logical extension to the High Street. The argument used that this site could satisfy a large part of its new retail space is flawed. It contains a large number of community uses (bank, Baptist Church, which has been much extended already, has planning permission for further developments the dentist, nursery etc.) whose relocation / re-provision needs to be considered as part of any development proposals. The appearance of the community use "houses" is an important aspect of the character of the Village. The cost in acquiring (may require CPO) the individual sites could be a significant hurdle to the financial viability in redevelopment of the entire site.	The proposal for the site includes the retention or replacement of the existing uses, including community uses. Policy DES1 requires all development to be in keeping with the character of an area, and therefore while the exact appearance of the existing houses may not be retained, the new development will need to be in line with the character of the town. The comment on the cost of acquiring the site is noted, and the site is now described as an 'opportunity area' rather than an allocated site, as it is noted that it has not yet been promoted for development.	BAN1 changed to 'opportunity area'.

The existing house-type buildings on this site are part of the character of the village. Concern that they will be replaced with 'modern' architecture. This stretch of road adds to the ambience of the village.	The concern over the character of the town is noted. Policy DES1 requires all development to be in keeping with the character of an area, and it is believed that this is possible to achieve with modern architecture.	N/A
Support the proposal if it involves building affordable housing on the site.	As a site of over 10 housing units, affordable housing will be expected as part of the redevelopment.	N/A
Support piecemeal development of the site with small independent shops.	A more comprehensive redevelopment will ensure that additional housing can be provided alongside new shops, and ensure that the development is in keeping with the character of the area - piecemeal development can lead to a less complementary variety of architecture.	N/A
Compulsorily purchasing these businesses would cause unnecessary distress and upheaval to many people.	The current unavailability of the site due to its multiple ownership has been noted, and the site is now described as an 'opportunity area' rather than a site allocation - it is still believed that the site represents a good opportunity for redevelopment, but it is also recognised that it is not currently deliverable.	BAN1 changed to 'opportunity area'.
The police station building should be preserved, even if used for another function.	The re-use of existing buildings is preferred where possible, as this is a more sustainable approach. However, the police station building is not a listed building, and its retention cannot at this point be guaranteed.	N/A

<p>The high street is already is congested with inadequate parking available and many hazards caused by large delivery trucks and this would exacerbate the problem.</p>	<p>Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets. Access for deliveries would need to be considered as part of any specific planning permission application for development of retail on the site.</p>	<p>N/A</p>
<p>This is the best of the three main Banstead proposals, but only if additional car parking space is provided.</p>	<p>Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>N/A</p>
<p>A number of respondents were happy to see the police station, fire station, and possibly the bank redeveloped, as long as the church and the house-type buildings that contain local service businesses are maintained.</p>	<p>The church has been removed from the proposed site. The re-use of existing buildings is preferred where possible, as this is a more sustainable approach. However, the house-type buildings are not listed buildings, and their retention cannot at this point be guaranteed.</p>	<p>Christchurch removed from site allocation.</p>

Need to keep a pub at the eastern end of the village.	The pub is not included in any site allocations	N/A
The development in Banstead should be focused on the two ends of the High Street (BAN2 and BAN3) rather than in the middle of it as with this proposal.	No clear reason is given as to why development should not take place in the middle of the High Street.	N/A
Christ Church has spent a lot of money on expansion and has planning permission for further changes, and thus seems to be a significant barrier to this development.	This is noted, and the church has been removed from the proposed site.	Christchurch removed from site allocation.
Extra buildings on this site will cause overlooking and reduce light to surrounding properties.	The majority of the site does not overlook existing properties. However, it is noted that there is some possibility of overlooking on the eastern end of the proposed site. However, Policy DES1 requires that new development must not impact on existing residents through overlooking or an unacceptable increase in light pollution.	N/A
If this proposal goes ahead, there should be sheltered housing and affordable housing included.	As a site of over 10 housing units, affordable housing will be expected as part of the redevelopment. Sheltered housing is anticipated for some developments in the borough, but is not currently expected to be provided on this site.	N/A
The size of any new retail units should be similar to the rest of the High Street to maintain a mix of small businesses only, which would be suitable for a village.	This is noted, and the site description notes that it should include "Retail provision, and type/size of units, to complement character of Banstead Village and its existing retail function"	N/A

<p>There are plenty of sites that can be redeveloped across the borough with much less impact than this, please investigate those first.</p>	<p>A very wide range of sites for development have been explored and evaluated throughout the DMP process. This comment does not suggest any alternative sites.</p>	<p>N/A</p>
<p>This seems to be the only “magnet” site in Banstead Village that would be sufficiently large to accommodate an “attractive” store. The presence of the Baptist church would be a very significant impediment but if the financial means became available its removal to share the Community Centre site would enhance that site as a cultural centre with modern meeting rooms, an art gallery/exhibition space and/or an arts cinema. Far from providing competition for other shops the magnetic effect could have a very positive consequence of increasing their footfall, helping to sustain them</p>	<p>The comment on the development of a 'magnet' store is noted. The church has been removed from the proposed site due to the likely difficulty of relocating it.</p>	<p>N/A</p>

<p>BAN2</p>		
<p>Several of the buildings and uses within this proposal area are of significant value to the local community and need be retained or, if any larger scale redevelopment is replaced. The existence and protection of open spaces and mature trees throughout this area must be protected, as these add significant amenity value Any significant redevelopment will result in a commensurate increase in traffic, therefore then large scale of traffic control/junction improvements would be required and would impact upon area generally Should the SCC properties at Bolters Lane, namely The Squirrels and Bentley are to be redeveloped, further improved / better access is most likely to be required and further impacting on the local area and amenity Redevelopment of the former playing field site in Bolters Lane, (to the north of the Priory school is over</p>	<p>There is a general presumption in favour of reusing existing buildings wherever possible, but it may not be possible to retain every existing building in its current form. The community uses included within the buildings, however, will be retained or replaced. There are no designated open spaces within the proposed site. Trees will be retained wherever possible under Policy NHE3. The proposal is not expected to include such a significant redevelopment that traffic is significantly impacted, but any access issues would be addressed in an application for planning permission.</p>	<p>N/A</p>



<p>development and inappropriate. It is designated in the local plan as urban open land (UOL), and it is proposed to give it the equivalent protection as urban open space (UOS), therefore by definition it should not be included in the current proposals. It is understood that some sites in Banstead village area will needed to be redeveloped to meet the Core Strategy and the housing targets included (180 new dwellings by 2022). It is not clear from the DMP information that the extent of what UOL/UOS would need to be sacrificed to achieve these residential units. The planning case for large scale redevelopment in the Horseshoe, is weak.</p>		
<p>contains no estimate of the housing it could provide and the site is subject to flooding. The site is owned by 5 different public sector bodies and so has not been assembled. Given this and the fact that option testing has not commenced, the site is aspirational and there is no realistic way of assessing either the development contribution it will make or the timescale over which it will be delivered.</p> <p>The delivery of the site is so uncertain it should be treated as a windfall. Site BAN 2 should be deleted and replaced by other sites contiguous with the settlement boundary and which are available and deliverable.</p>	<p>The site is subject to only a small risk of surface flooding in some parts of the site. The fact that the site is currently owned by more than one body does not mean it is unavailable for development, and its availability has been assessed through the DMP process. No housing number is yet provided because housing is intended to be only a very small portion of the site, used to enable the redevelopment of community facilities. As the focus of the redevelopment is on community facilities, the exact level of housing to be provided is less vital at this point.</p>	N/A
<p>I wish to inform you that we have lodged our interest in purchasing some further land on the south side of our current Tennis Club premises with the Surrey County Council. I appreciate this does not fall within the ambit of Reigate &amp; Banstead Council, but nevertheless think you should be aware of this request, which would enable additional courts to be laid in time.</p>	<p>Noted. This area of land has been removed from the DMP site allocation.</p>	<p>Change to boundary of allocation site.</p>

<p>note that SCC has identified the Bentley Centre at the lower, northern end (within Area C) for the provision of a new Doctors Surgery to be located which is at slight variance with the second bullet point of the box detailing 'what could development on this site comprise' section of the consultation document</p>	<p>Noted, and the reference to specific areas has been removed.</p>	<p>Reference to specific areas for community uses to be developed has been removed.</p>
<p>The need for re-development of this area is not clear, though the clinic could be up-dated. It should certainly not include retail.</p>	<p>The need is for improved and additional public services for Banstead, and the potential for additional small scale retail in this area would be complementary to the western end of the High Street.</p>	<p>N/A</p>
<p>We object to the extension of the town centre to the west of Bolters Lane. There is no justification for this in retail and locational terms. We are concerned at the potential loss of community facilities, mature trees and much of the Urban Open Space which currently forms part of an important green corridor through the area. It is difficult to comment constructively without further information on the scale of development proposed. We hope that our concerns will be reflected in the final proposals.</p>	<p>The site was initially recommended not to be designated as Urban Open Space due to including relatively large amounts of hard standing. However, upon review, it has been decided to redraw the boundaries of the Urban Open Space to only include areas of green, open space - the Urban Open Space designation will therefore remain and be protected under Policy OSR1. The primary focus for the redevelopment will be community services, and there will be no loss of community facilities - retail will only be included in redevelopment if it is shown to be viable and is necessary to support the redevelopment of community facilities.</p>	<p>Urban Open Space boundaries redrawn and recommended for re-designation.</p>

Removal of parking spaces at this site would make it more difficult for people to come to Banstead for shopping and services.	Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets.	N/A
No means of funding has been identified for replacement facilities - more detail is needed.	The site description is clear that the community facilities may be funded by some enabling housing or retail development. Additional detail on funding will be developed before planning permission is applied for.	N/A
It is unclear if replacement facilities will be built - more detail is needed.	The site description is clear that the primary purpose of redevelopment is to improve community facilities - they will be replaced on-site.	N/A
Traffic in The Horseshoe is already terrible at school opening and closing times. The road would need to be widened if additional services are being provided here, along with traffic control and junction improvements. The current construction standard of the road is also poor, and it may need to be completely dug up and relaid.	The site description notes that the site will require "upgraded pedestrian and vehicular access and drop-off to serve the schools". The specifics of access requirements will be decided at the point at which planning permission is applied for.	N/A
Waste of money to redevelop the library and clinic that were recently refurbished.	Noted.	N/A
Making changes here is unfair to regular users of the day centre.	The changes aim to improve the experience of the Horseshoe area for all users, and will retain existing community uses.	N/A

<p>The open space on Bolters Lane is important to the character of the village, and serves important recreational functions for joggers, walkers, and dog-owners, and should be preserved. This space should be enhanced rather than removed.</p>	<p>Noted. This area of land has been removed from the DMP site allocation.</p>	<p>Bolters Lane field removed from site allocation.</p>
<p>Open space and trees in this area should be protected - proposal could potentially see loss of mature trees, and concern that final development will not contain enough open space.</p>	<p>In the Regulation 18 DMP consultation, it was proposed that the Horseshoe should lose its Urban Open Space designation. On review, it has been decided instead to redraw the boundaries to encompass areas of open space and exclude areas with buildings or hard standing. The redeveloped site should therefore include at least as much open space as the current site.</p>	<p>Urban Open Space boundaries redrawn and recommended for re-designation.</p>
<p>A number of respondents suggested a combined GP surgery and clinic in enhanced facilities would be very welcome.</p>	<p>Noted.</p>	<p>N/A</p>
<p>The area should be kept solely for community uses - not residential or retail.</p>	<p>No clear reason is given as to why small scale retail or residential uses would be inappropriate here.</p>	<p>N/A</p>
<p>There should be additional parking spaces for school drop-offs, but not a dropping off point at the school itself, as this can cause more danger.</p>	<p>Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets. The safety of drop-off points outside the school will be addressed specifically in an application for planning permission.</p>	<p>N/A</p>
<p>If the youth club is removed a suitable replacement will be needed before redevelopment begins, to ensure youngsters have somewhere to go.</p>	<p>The current proposal is to replace existing community uses.</p>	<p>N/A</p>

This level of development will lead to Banstead becoming a very built-up urban area, changing the character.	The level of development envisaged for this site would not unduly alter the character or size of Banstead.	N/A
No additional connectivity is required between the Horseshoe community facilities and the High Street retail area.	Increased connectivity between community facilities and the High Street will make travel between the two easier for pedestrians.	N/A
There will not be enough footfall on this site to justify retail.	Retail will not be provided on the site unless a viable case for it can be made.	N/A
One of the best things about Banstead is having all the shops along one street, no need for a subsidiary shopping area.	It is unclear why having an additional retail area would be problematic - nevertheless, the current proposal is only for small scale retail if needed to enable the redevelopment of community uses.	N/A
Surely the library is a listed building, as it is a brilliant example of enlightened post-WWII thinking.	The library is not a listed building.	N/A
Developing this area will further shift people away from the more neglected eastern end of the village - the High Street is already stretched out too long.	There are plans for redevelopment at both ends of the High Street, and in the middle of it - it is believed that there are enough people living in Banstead to make all areas of the High Street successful.	N/A
The scale of these proposals should be substantially reduced.	No clear reason is given for why the scale of the proposals is considered too large.	N/A
Development of the Bolters Lane field could potentially open the flood gates for further development of green space further along Bolters Lane on land next to the nursing home.	Noted. This would not open up the flood gates to further development as development on the field would have to be robustly justified as enabling development. However, this area of land has been removed from the DMP site allocation.	Bolters Lane field removed from site allocation.
Housing for the elderly could be built on this site, allowing older people to stay in Banstead while freeing up larger homes for families.	This is noted, but housing on the site is envisaged to be a minor component that enables development of community facilities, rather than a key aspect of the site. Some housing may, however, be suitable for	N/A

	older people.	
Is it possible to limit occupation to existing residents of the Borough only?	No.	N/A
Any new development should be screened by trees as far as possible.	Noted.	N/A
I think that any houses built in the village should be just that - small HOUSES with gardens and should be affordable for those workers who perform vital functions within the community - nurses, postmen, teachers, etc.	Noted. The exact form of any housing to be developed on the site will be decided when a planning application is submitted.	N/A
RBBC should endeavour on the behalf of the Banstead Community to enable the right for the community to reclaim the land for future community related development. This would be more in line with the Localism announcements made by the Coalition Government in 2011.	The Community right to reclaim land refers to derelict or underused land in public ownership, which this site would not qualify as.	N/A
I attended your presentation of the DMP at Banstead Library in September and was told by one of your representative staff that no dwellings were to be built on the Horseshoe site and that 'basically, it will be an update of the buildings and facilities already there'. The most recent publication continues to state more houses will be built on the Horseshoe. Which is correct?	The focus of development will be on redevelopment of the existing community facilities on the site. Some housing and/or retail may be added to the site to enable the redevelopment to be financially viable. This will be only a small amount of housing or retail.	N/A
We do not believe that the case for large scale redevelopment in the Horseshoe, rather than smaller piecemeal developments, has been made.	No clear reason is given for why piecemeal development would be better. Piecemeal development is more likely to lead to clashing architectural styles and comprehensive redevelopment will allow for a full analysis of what community uses are most needed in the area.	N/A

This is the area where such development is likely to do least damage to Green Belt land or to the established character and visual amenity of the Banstead area.	Noted.	N/A
We could probably manage 80-100 houses with adequate parking over the Horseshoe area, but only if the unused sports fields off Bolters Lane were to be made available for the new residents as parkland or managed open space for wildlife.	The proposal for this site is actually to produce significantly less housing than that, with a small amount of housing developed to financially enable the redevelopment of community facilities.	N/A
The Banstead Downs Tennis Club has sent several enquiries about purchasing part of this site to build more courts, but have received no response, and are therefore alarmed that this proposal includes land they wanted to purchase.	Noted. This area of land has been removed from the DMP site allocation.	Bolters Lane field removed from site allocation.
The tree lined entrance to the village along Bolters lane is one of the high points of the Village.	Noted. The area of land along Bolters Lane has been removed from the DMP site allocation.	Bolters Lane field removed from site allocation.

<p>For reasons already given, there should be no element of retail in zone A. The overall plan for the Horseshoe as a centre for community services should be maintained. The opportunity is, apparently, being taken to enhance these services and modernize some of the buildings. It is not clear why this alone would necessarily require a loss of urban open space rather than a redistribution that might improve access to and use of the green space. The type and configuration of the residential development is not explained but it would be an ideal residential development site with easy access to the town centre and station. It is clear that this alone would inevitably result in a loss of urban open space. Importantly, there should be no loss of parking space, more is needed to support the consolidation of Banstead as an attractive and useful centre. Though the map does not extend to the apex formed by the Brighton Rd and Winkworth Rd this corner would provide an ideal site for a Banstead Fire Station with ready access to the intersection of locally important routes. Consideration could be given to bringing the ambulance station to this site with the possibility of sharing garage and communication facilities. This would allow social and community facilities to be consolidated around the Horseshoe.</p>	<p>The initial recommendation was to remove the Urban Open Space designation from the Horseshoe. However, on review, it has been decided to redraw the Urban Open Space boundaries to exclude built up areas of the Horseshoe. The proposed development should therefore have at least as much open space as the current site.</p> <p>In terms of parking, Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets.</p> <p>The rest of the points are noted.</p>	<p>Urban Open Space boundaries redrawn and recommended for re-designation.</p>
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**KBH1 - Land at Kingswood Station - Removed from the DMP as now has planning permission**

BAN3		
<p>is heavily constrained by flooding, being within the setting of listed buildings and by the need to re-provide a community centre and open space. The ability of the site to deliver 15 units has not been tested and is not clear.</p> <p>The delivery of the site is so uncertain it should be treated as a windfall. Site BAN 3 should be supplemented by other sites contiguous with the settlement boundary and which are available and deliverable.</p>	<p>There is a small amount of surface water flooding on the car park but otherwise it is not constrained by flooding. Consideration of the Conservation Area will be required by the stie allocation.</p> <p>The site allocation is also very clear that community uses must be retained/replaced – if this cannot be achieved then permission should not be granted.</p>	<p>“ Design must be sensitive given the site is situated within the Conservation Area” added to the site allocation</p>
<p>Redevelopment of the Community Centre involving its demolition and replacement by housing would be unpopular. Alternately, the building could be re-sited, enlarged and modernised to allow a greater range of cultural events to be held there. The inclusion of housing in the scheme would be welcome. This could enhance the appeal of Banstead as a cultural centre.</p>	<p>The site allocation requires community uses must be retained or replaced, wholesale loss of the community facilities would not be supported</p>	<p>No change</p>

<p>More parking is needed if this proposal goes ahead, as it will increase usership - the car park is already often overflowing.</p> <p>Proposal would mean loss of the car park - and the eastern end of Banstead needs to have a car park to encourage people into the town.</p> <p>There is room for some development, but not at the expense of the car park. The car park is essential to the operation of the community hall. People will park on the road during busy events otherwise.</p>	<p>Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	N/A
<p>The loss of a well-used community centre would be detrimental to the area.</p>	<p>The site allocation states that there must be the retention or replacement of community uses - this use is not to be lost.</p>	N/A
<p>Replacing community facilities with housing does not make sense.</p>	<p>The site allocation states that there must be the retention or replacement of community uses - this use is not to be lost.</p>	N/A
<p>This resource was built by the community and is run very successfully by them - it should not be taken away. The centre is used by a very wide variety of groups.</p>	<p>The site allocation states that there must be the retention or replacement of community uses - this use is not to be lost.</p>	N/A
<p>This is in a conservation area so careful consideration will be needed.</p>	<p>Site allocations states "Design must be sensitive given the site is situated within the Conservation Area"</p>	<p>" Design must be sensitive given the site is situated within the Conservation Area" added to the</p>

		site allocation
How can the facilities be 'enhanced' if their space is reduced and replaced with homes?	There is no suggestion in the site description that the space for community facilities will be reduced.	N/A
I am sure very few people would object to the replacement of these community facilities with a modern equivalent together with the same or increased number of parking spaces.	Noted.	N/A
Part of the open setting is necessary to provide the setting for the Castleton House listed building and a link with the Urban Open Space to the rear. It should retain its UOS designation.	The Urban Open Land around the community centre does not fulfil the functions of open space, as it is a tarmacked car park.	N/A
Development here would damage the timeless beauty of Park Road.	Any application for planning permission on this site would need to take into account the impact on the character of the surroundign area.	N/A
There is insufficient space to keep a community centre on the site and add housing.	The site has quite a significant amount of space on it currently, and it is believed that housing could be comfortably added to a redeveloped community centre.	N/A
The land on which the Community Hall stands is part of the Neville bequest to the people of Banstead and was formerly meadow land. This bequest stipulates that the land be used for recreational purposes, a condition that is fulfilled by the present Community Hall. It is not, therefore, available for redevelopment for housing.	The proposed redevelopment will include an enhanced community centre, fulfilling the stipulation for recreational purposes.	N/A

<p>If a target has to be met it would be better to look at an extension to De Burgh Park which would be far less disruptive to village amenities and would quite likely be more cost effective.</p>	<p>The point is noted - however, an extension of De Burgh Park poses some significant problems. In particular, the green belt begins at the end of the current road, so an extension beyond the end of the current road would require land to be removed from the green belt, and would therefore be against national planning policies that require a focus on existing urban areas before a removal of green belt can be justified.</p>	<p>N/A</p>
<p>Would be better to put new development on playing fields rather than on the community centre.</p>	<p>Playing fields are generally strongly protected statutorily and in planning policy. The proposed development on this site will retain the community centre use.</p>	<p>N/A</p>
<p>Any development in this location would result in homogenisation and a reduction in ecological environment and cultural diversity.</p>	<p>The majority of the site is currently a car park, and has no ecological value. The proposed development will retain the community centre use, maintaining cultural diversity.</p>	<p>N/A</p>
<p>Chuck's Meadow was appropriated and gifted to local residents and must therefore only be used for community benefit - there may be legal implications to any attempts at a change of use.</p>	<p>The proposed development on this site will retain the community centre use, keeping the site for community benefit while also adding a small amount of housing.</p>	<p>N/A</p>
<p>A rebuild is not likely to be viable if financing is dependent on 15 new dwellings. We accept the layout could be more efficient but part of its open setting is necessary to provide the setting for Castleton House listed building and link with Urban Open Space to the rear. should retain its UOS designation. Commend the desirability of a public car park serving eastern part of the centre which could include parts of this site, Chucks Meadow and the Woolpack car park, with pedestrian links to High Street.</p>	<p>No clear reason is given as to why a rebuild based on housing is not likely to be viable. The site does not fulfil Urban Open Space purposes, as it is a car park, and is therefore recommended for removal as Urban Open Space. It is not believed that a tarmacked car park provides a notable setting to a listed building. Policy TAP1 states that parking must be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough</p>	<p>N/A</p>

<p>Extend cycleway 22 from Woodmansterne Lane along the southern edge of the Community Hall car park and on through the Lady Neville area to Avenue Road. This would enable cyclists to avoid the High Street with all its congestion and pollution. This proposal has been made before but now has even greater relevance in view of traffic flow increases and the need to promote healthy living.</p>	<p>The point is noted - however, although the official National Cycle Route 22 briefly goes along the High Street, there is a footpath along the section suggested in this comment, and it is explicitly signed as suitable for bicycles to use.</p>	<p>N/A</p>
<p>This site, separate from the commercial centre of Banstead, could be used to provide a cultural centre for the Banstead area. It should be seen as cultural magnet.</p>	<p>This is noted - the specifics of the redevelopment will need to be included in an application for planning permission, which will also deal with the question of parking.</p>	<p>N/A</p>

<p>BAN4</p>		
<p>I wonder if by squaring up the boundaries if some more homes could be allowed without a major loss to the Green Belt.</p>	<p>While the general principle is noted, there would be a question of justifying why the boundaries extend beyond the existing edge of the village, and why they could not be extended even further - this would work against the principle of trying to contain sprawl or coalescence.</p>	<p>N/A</p>
<p>Agree that it is sensible to omit Netherne from the Green Belt</p>	<p>Noted</p>	<p>N/A</p>

<p>There is nothing in the plan to state why the change to green belt status is required and what it will achieve. Without this information shown it would seem to be either a waste of time and money or that there is a ulterior motive.... also the land within the village is privately owned so the council can't build anyway. Lastly my understanding is that development in the handful of plots within the village is extremely difficult to be done due to overage payments that would be due to the NHS / govt as it used to be a hospital.</p>	<p>The DMP document explained that the village currently makes a low contribution to the purpose and integrity of the green belt due to the character, density, and extent of development. Essentially, this means that the area does not fulfil green belt functions at this point in time. The DMP process is an important opportunity to ensure that policies and designations in the borough's planning documents accurately reflect national planning policy - this ensures we have a robust and defensible local plan that can be found sound and legally adopted.</p>	<p>N/A</p>
<p>Concern was expressed about the proposal, and we would like to arrange a village meeting with yourselves to discuss.</p> <p>One thing that we were unanimous about was the need to keep the area around the village green (ie surrounding the Leisure Centre) as Green Belt. Whilst there is no development intention there, we would certainly wish to protect this area from any future building.</p> <p>need to add the area where the commercial property was, which has now been demolished - near Harden Farm Close</p>	<p>Areas of green space, such as the Village Green, have been assessed as part of the Urban Open Space review. A number of such spaces within Netherne have been recommended for designation as Urban Open Space, and will subsequently be protected from development under Policy OSR1. It is believed that the area of commercial property referred to has been included in the boundary as drawn in the DMP document.</p>	<p>Urban Open Space review concluded, and several open spaces in Netherne recommended for designation as Urban Open Space.</p>

<p>The settlement was not identified in the “Initial Areas of Search” of the Sustainable Urban Extensions (Stage 1) document. If this site is to be considered for Green Belt release, despite not being identified through the evidence base, then other sites not included in the Initial Area of Search should also be considered. Netherne on the Hill does is an isolated settlement and the proposed settlement boundary would not help bring forward further development in the village. On that basis, other more suitable sites such as the Land South of Holly Hill, Banstead (SHLAA Site BV15) should also be considered for Green Belt release. This site is contiguous to the settlement boundary of Banstead, has a historic permission for housing development from 1937 and would represent a more logical Green Belt release and sustainable urban extension than would Netherne on the Hill and would achieve greater housing benefits.</p>	<p>The areas of search are to do with future potential housing sites, not existing ones. The purpose of releasing Netherne from the green belt is to ensure that the Local Plan is consistent with national planning policy, it is not about identifying further development within Netherne. The village does not fulfil any green belt functions at this point due to the character, density, and extent of development. By removing it from the green belt, it ensures that the general green belt policy is robust, defensible, and sound. The land to the south of Holly Hill which is in the green belt is completely undeveloped at this point, and performs a significantly stronger greenbelt role than the built-up area of Netherne.</p>	<p>N/A</p>
<p>If this site is taken out of the Green Belt as proposed, is it anticipated that additional homes will be built here? This is unclear. Is there a site Masterplan or Supplementary Planning Guidance?</p>	<p>The village is not being recommended to be taken out of the green belt because of a desire to build housing, but simply because it is considered that the character, density, and extent of development on the site means it is no longer compatible with the purposes of the green belt under national policy. However, the boundaries of the green belt around the village are being drawn tightly, to make sprawl impossible; and numerous green spaces within the village have been recommended for designation as Urban Open Space under Policy OSR1.</p>	<p>N/A</p>

BAN5		
Keeping it in the Green Belt would ensure that stringent restrictions would apply to limit development of each of the houses, guaranteeing that their character was consistent with the Green Belt in which they are embedded. For this reason it is supported.	Noted	N/A
We strongly support including Babylon Lane/ Lovelands Lane in the Green Belt. The original omission was an anomaly.	Noted	N/A
This policy approach seeks to include the ribbon settlement within the Green Belt. The settlement is in a highly accessible location less than one mile from junction 8 of the M25 and approximately 5 miles from Reigate and Redhill. It is not logical to be considering adding more land to the Green Belt in such a location when there is a demonstrable need for more than 6,900 homes within the Borough over the plan period and an unknown demand post-2027.	It is extremely unlikely that significant additional housing would be given permission in this location, as any significant amount of infilling or back garden development would likely be considered out of keeping with the character of this rural area. The amount of housing that could be provided here would do little to contribute to housing targets, and suitable locations have been identified elsewhere to meet the borough's housing need.	N/A
Happy to have these areas back in the green belt but it seems logical to allow a strip on the line of the existing properties to be outside the green belt to gain a few in keeping houses.	While the general point is noted, only the currently existing houses are located outside the green belt - maintaining a strip of non-greenbelt land anywhere other than in the back gardens of existing houses would actually mean removing land from the greenbelt.	N/A



THE ORCHARD		
<p>Object to the portion of The Orchard fronting onto Banstead High Street being included in the Primary Shopping Frontage with potential development pressures at some future date. It is an important part of the green setting for the church and is well used for community purposes. It should remain as Urban Open Space. The Orchard currently designated UOL and is being redesignated as UOS. The entire Orchard and cemetery is always been excluded from the Town Centre Boundary in the local plan. The retail boundary is proposed to include the High Street frontage of the Orchard and the Church Institute as part of the retail centre. It is still proposed to retain their protection, but this seems to be a totally unnecessary change, and possibly a hostage to further adverse changes in the future. The blue Town Centre boundary line in plan RET2 should return to its original position. The Orchard must be preserved. Development here would amount to vandalism.</p> <p>I understand that the Orchard will be given a change in status that, in theory, will protect development there, but also that the new designation that it will be given may not be as protected as it should be and will leave it vulnerable to future change.</p>	<p>There is no suggestion within the DMP that the Orchard site will be developed. There was no town centre boundaries in the previous Local Plan so the boundary has not been amended, it has in fact been introduced. All town centre boundaries for all towns in the borough have been drawn in a way that includes some green spaces, inclusion into a town centre boundary does not equal development. The Orchard site is retained as Urban Open Space in the DMP, and Policy OSR1 requires very stringent requirements to be met for the loss of Urban Open Space, even if such a suggestion were being proposed.</p>	<p>No change</p>
<p>This area has previously been classed as UOL but is now included in your plan as UOS. It must be returned to UOL.</p>	<p>UOS and UOL are exactly the same designation, with exactly the same level of protection.</p>	<p>No change</p>

<p>Even if the diocese did agree to sell to you, this would end the two biggest community activities in the May Fayre and the Summer Fete so the community and local charities, would suffer. We carried out a feasibility study of moving them to the Lady Neville park but as you will be building on that, this wouldn't be possible. Plus it would be logistically impossible to do this as the impact on traffic and local residents of parking would be impossible.</p>	<p>There is no suggestion within the DMP that the Orchard site will be developed. There was no town centre boundaries in the previous Local Plan so the boundary has not been amended, it has in fact been introduced. All town centre boundaries for all towns in the borough have been drawn in a way that includes some green spaces, inclusion into a town centre boundary does not equal development. The Orchard site is retained as Urban Open Space in the DMP, and Policy OSR1 requires very stringent requirements to be met for the loss of Urban Open Space, even if such a suggestion were being proposed. There is also no proposal to build on Lady Neville Park.</p>	<p>No change</p>
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**RTC1 – MARKETFIELD WAY/HIGH STREET, REDHILL - Removed from the DMP as now has planning permission**

<p>RTC2</p>		
<p>There was previously a much more comprehensive scheme, including an Asda supermarket, for this site and a wider area. Development of a wider site should be considered at this location.</p> <p>Rear of Cromwell Road – Wider Scheme The current scheme (RTC2) and adjacent development Knowles House (2-10 Cromwell Road &amp; 35-37 High Street) are for the current footprint of buildings along Cromwell Road and High Street. There is</p>	<p>The whole site is no longer being promoted for development (falls within a number of ownerships) and part of that original site has recently undergone refurbishment so is not included. It is also a relatively difficult site to redevelop as a whole given the site constraints including the topography of the site. The</p>	<p>No change</p>

<p>also potential for development to the rear of the site, potentially for a comprehensive development at this location. It could also be linked to a wider opportunity to retrofit and improve the energy efficiency of social housing units in this location.</p>	<p>residential land to the rear is within Raven's ownership - it would be for them to bring this forward.</p>	
<p>We note that this site is allocated for a range of development types including a mixed use development of residential and offices, residential only or offices only. Whilst the site allocation does include the provision of retail uses, as noted above the draft town centre policies would allow Class A retail development to be provided at this location which is within the new Town Centre Boundary. As set out above, we consider that this could be harmful to the existing established Primary Shopping Area further to the south. We request therefore that this allocation is amended to specify that retail uses would not be appropriate in this location, unless it has been demonstrated that a sequentially preferable location in the primary shopping area is not available.</p>	<p>The Development Management Plan identifies that this frontage falls within the secondary frontage and stipulates what would be suitable in this location.</p>	<p>No change</p>

RTC3 - Royal Mail have requested this site is removed from the DMP as they have no intention to redevelop the site

<p>RTC4</p>		
<p>The consultation mentions the numerous protected trees on this site, however none are currently subject to tree preservation orders. If it is appropriate for trees on council owned land to have TPOs, would the council consider protecting them?</p>	<p>There are some trees with TPOs on the site (along the southern frontage). The site is owned by SCC but there is no reason why trees should not be protected by TPOs if they are suitable. If you would like to suggest trees for protection then please fill in and return the form below to the Tree Officer: <a href="http://www.reigate-">http://www.reigate-</a></p>	<p>Site allocation wording amended to "few protected trees"</p>

	<a href="http://banstead.gov.uk/downloads/file/440/tree_preservation_order_request_form">banstead.gov.uk/downloads/file/440/tree_preservation_order_request_form</a>	
I support the proposal, but question the final bullet point “Re-provision/relocation of community uses where necessary” – does this refer to relocation away from this site or to this site, or a mix of both?	The intention is to seek provision on site, "where necessary" has been removed	Where necessary has been removed
in relation to the indicated residential capacity of the site, SCC considers that the 80 units referred to underestimates this as it is working up a proposal for both residential apartments to be located above a replacement community hub building and a separate Extra Care block. SCC requests that the capacity figure is increased to ‘up to 110 units subject to considerations of detailed design and amenity impact’.	Taking account of national guidance that transport hubs should be maximised, and taking account of site context, the capacity has been increased to up to 110 units.	No. of residential units amended
<b>RTC4</b> - It appears that some of the land at Noke Drive, currently managed by Surrey Choices, will remain as a sensory garden and office facilities. However, the land occupied by the larger Colebrook Day Centre will, following its closure, be sold and used for residential units. Redhill residents currently using the services provided at this centre are having to relocate to “Hubs” in Reigate, Caterham or Bletchingley (when opened). As you will be aware two of these sites are out of borough. I understand that the providers of day facilities at Colebrook were unable to locate suitable local premises, hence the need for Redhill users to move to Bletchingley. I am dismayed that there are no replacement facilities incorporated in the current plans. Space should be designated on this site/Redhill town centre for community use so that these adults are able in the future to use local day facilities.	The actual delivery of adult social care is provided by Surrey County Council and we cannot require them to provide this service in Redhill town centre. However, we have passed on comments relating to the desire for this to continue to Surrey County Council. With regard to the DMP we have sought to facilitate this continued service and the site allocation includes a requirement for provision of space for community uses, potentially including adult social care.	Site allocation wording to include reference to adult social care

RTC5		
Development should include some community use.	It would not be viable to include community use here, however other site allocations within Redhill (including RTC4 Colebrook and RED1 Quarryside Business Park) include a requirement to provide community facilities.	No change

RTC6		
If this can be developed to create us income then good BUT every parking space must be replaced FIRST. In fact we should increase the number of spaces as we appear to be building loads of flats with minimal parking. We do not want to encourage new buyers to be forced to park in our side roads.	Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .	No change
This area must not be developed until it is clear how the new Sainsbury car park is working. It is the only car park in Redhill that can take larger vehicles. An alternative location for this should be provided. An addition should be to redevelop the bus station with improved facilities and with shops above. These shops would be linked to the	Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The site allocation requires an assessment of local demand for parking (including from town centre users) and off-street overnight parking for heavy goods vehicles. Policy TAP1 requires that if development would result in the loss of	No change

<p>existing path at first floor level going to the Harlequin and Library.</p>	<p>existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets</p>	
<p>RTC6 - object to removal of car parks without equivalent or increased capacity being provided elsewhere within the town centre. Town centre parking already reducing, whilst at the same time increasing the potential number of cars into town through the development of Marketfield Way and loss of that car park. A few additional spaces in Sainsburys will not address the extra demand. The Sainsburys roundabout is already busy and extra traffic using it will make the situation worse. whilst the Council maintains that existing parking capacity would be maintained this is not satisfactory as the level of parking provision would be greatly increased with increased development.</p> <p>The Gloucester Road car park should only be lost if wider parking controls introduced in central and edge-of-centre Redhill (see comment on TAP1).</p>	<p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets. Any planning application would need to take account of the impact on the local highways network in line with TAP1, and taking account of the Transport modelling which has been done to support the Regulation 19 document.</p> <p>The adopted Core Strategy 2014 states that the Council will also work with Surrey County Council to investigate, and where appropriate introduce, Residential and Controlled Parking Zones.</p>	<p>No change</p>

RED1		
<p>That the mention of community provision is somewhat half hearted, preceded by “potential” Given the presence of community uses on the site currently, and lack of such uses on the adjacent Watercolour development, and redevelopment here should include community provision. Remove references to “potential”.</p>	<p>No evidence of actual demand has been provided for this site but it is acknowledged that there may be demand for community uses. Wording has been updated to "Community facilities should be provided unless it can be demonstrated there is no demand for them"</p>	<p>Wording has been updated to "Community facilities should be provided unless it can be demonstrated there is no demand for them"</p>
<p>RED1: Firstly, the plan showing the site does not represent the full extent of land that is controlled and is being promoted. This site is available now and a planning application is in the early stages of being prepared. We note that the proposed policy states that “occupational leases need to be acquired”. This statement is not correct and we can confirm that all leases on the site are short terms leases. The owner is not aware of any surface water concerns. The site is also not considered to have any material contamination issues</p> <p>Turning to the development potential of the site, we do not believe there are any amenity issues regarding the adjacent railway line that are not easily overcome.</p> <p>There is a long-established highway access to the site, which was in place prior to the Watercolour development being developed. Thornton Side was realigned as part of the Watercolour development and designed specifically to continue to service the requirements of this industrial site, which has an existing high level of existing vehicle movements. Any redevelopment of the site will have a far-lower impact on the</p>	<p>The plan and timescales will be amended accordingly. Reference to occupational leases have been removed</p> <p>Our mapping and the updated Strategic Flood Risk Assessment indicates that the site has surface water issues so it will be up to the applicant during any planning application to demonstrate that this is not still an issue and the development won't create issues with surface water. Any planning application should be informed by the Strategic Flood Risk Assessment Level 2.</p> <p>In the same way, any planning application will need to cover off contamination and amenity issues with regard to the railway.</p> <p>The density on the rest of the sites is around 45dph, so the figure of 60 is</p>	<p>The plan and timescales will be amended accordingly. Reference to occupational leases have been removed</p> <p>The site allocation has been updated to read: "Development should integrate with existing pedestrian routes and roads within the adjoining Watercolour development including Reeds</p>

<p>road network and, therefore, we do not agree that access along Thornton Side will be made worse. Given this, access from Thornton Side to this side will be acceptable in highway terms.</p> <p>Policy RED1 proposes 60 dwelling for this site, don't believe that this "optimises the potential of the site to accommodate development" as required by paragraph 58 of the NPPF. adjoining Watercolour scheme far-exceeds this density. We believe that a scheme of up to 125 dwellings will optimise the potential of this site. The policy also sets out that some community provision is to be explored as part of any future development. We are aware that the Watercolour scheme had previously proposed a community facility as part of that approved scheme. However, it was latterly agreed with the council that this facility was no longer required and an in-lieu contribution of £200,000 was made.</p> <p>Any community facility requirement therefore appears to been resolved, As such we question re-establishing this requirement again?</p>	<p>believed to be appropriate to the surrounding area whilst still optimising the potential of the site. This also reflects that there may need to be provision for community uses, the need for which would still have to be explored at the planning application, regardless of what has happened in the past.</p> <p>The site allocation has been updated to read: "Development should integrate with existing pedestrian routes and roads within the adjoining Watercolour development including Reeds Meadow and Thorntonside. " As such, access should be considered from both Reeds Meadow and Thorntonside as it is not agreed that sole access from Thorntonside would be suitable for a housing development of this size.</p>	Meadow and Thorntonside.
<p>I am happy for more housing but reluctant to see loss of employment premises. Again proper parking must be catered for. The rest of Water Colours is suffering from inadequate parking facilities and we do not want to compound the felony.</p>	<p>Noted. Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in</p>	No change



	unacceptable levels of on-street parking demand in existing or new streets .	
The development of this site should consider continued provision of community/SME space as a live-work development as well as of dwellings. This would be consistent with the initial plan for development of the Watercolour site, which included a community centre and some industrial units (now superseded by housing at the Kilns). This combination of uses would enable a more intensive development without a proportionate increase in the level of parking provision required.	This site allocation requires "Community facilities should be provided unless it can be demonstrated there is no demand for them"	Wording has been updated to "Community facilities should be provided unless it can be demonstrated there is no demand for them"

<b>RED2</b>		
Loss of employment buildings will be a shame. Ok for housing but parking will be critical.	Noted. Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .	No change

**RED3 - Removed from the DMP as planning permission has been granted**

RED4		
What would be required..? Please include Appropriate improvements to site access onto Mansfield Drive	This has been added to the site allocation policy	Suggested wording added
Any residential development on the site should reflect the scale and density of the surrounding two storey housing development (i.e. the terraces surrounding the site and located along Huddleston Crescent). Blocks of flats would not be suitable for the site and would be detrimental. Indeed, any new residential development on the site should be provided with adequate parking in order not to impact on existing residents in the area.	The site allocation requires development to be of a scale that reflects character of the surrounding area and safeguards residential amenity. Other policies in the DMP also require that design should respects the character of an area and have due regard to the layout, density, plot sizes, building siting, scale, massing, height, and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site.	No change

RED5		
The site forms part of a wider regeneration project, regarding SCC welcome the inclusion of the site in its accessible and sustainable location, and that the site is seen as an opportunity to intensify the previously developed site. SCC would wish to continue the dialogue with RBBC on the site specific issues relating to car parking, flood risk & attenuation and further discuss, as the design evolves, the site specific issues including the consideration of the CS policy CS15, regarding affordable housing contributions in regard to wider regeneration objectives. The site is identified in the SHLAA as being suitable, available and achievable for residential development with a potential capacity of 6, whilst the DMP cites up to 10 homes. The DMP allocation also raises the potential for other community uses on the site, and SCC would welcome the opportunity to discuss this further with the Borough Council in relation to more detailed pre-application discussions.	Noted. Pre-application discussions are welcomed and we will continue to engage with you as part of our DTC process	No change

RED6		
What would be required..? Please include: Appropriate improvements to site access onto Radstock Way	This has been added to the site allocation policy	Suggested wording added
RED6: its allocation is welcomed. The site forms part of the wider Merstham regeneration and the relocation of the library and youth centre into a community hub. The site should therefore be considered in regard to the criteria of CS policy CS15, regarding affordable housing contributions and wider regeneration objectives. SCC welcome further joint working with RBBC in regard to bringing the site forward for residential development, having regard to the existing planning application and the identified site specifics. Within the SHLAA the site appears to be identified as site M13 with 15 dwellings whilst the DMP cites up to 30 homes. As part of the development process and therefore the County Council would welcome continued dialogue regarding the form of residential on this site. The site is also adjacent to ERM5, Oakley Farm also allocated within the DMP and SCC would wish to be engaged in discussions regarding the use of the adjacent site for 95 residential homes, small business space provision and open space.	Noted - we will continue to engage as part of our Duty to Cooperate	No change

**RED7 Redhill Law Courts** – This site has been removed as it is understood that this site will be opening as a school in September 2018, following a planning application for a new junction onto Hatchlands road which has recently been granted planning permission (Ref: 17/01494/F). Planning permission is not required for the change of use from law courts to a school.

RED8 – Reading Arch Road/Brighton Road North, Redhill		
<p>In particular, the evidence shows there is no quantitative need for more convenience space based on the Needs Assessment Update in 2016 and neither is there a need for extra retail warehousing. There is therefore no need to allocate sites for it. This constrains the opportunity for sites to be considered for alternatives in the plan. For example, site RED8 is an example where the policy of tall buildings interacts with mixed uses so we would argue it provides an excellent opportunity for higher high density housing up to say eight floors with scope for retail or commercial space at ground floor level on the main road frontage. The notion of retail warehousing with surface parking is not feasible at this location and best practicable uses will be largely residential. Therefore, we don't want to see this, or other additional sites, allocated for retail warehousing.</p>	<p>The retail needs assessment 2016 confirms that in Redhill is under-represented in the main bulky goods sub-categories (furniture, carpets, DIY, electrical goods, sports and toys) and there is limited scope to meet retailer requirements for large units. The only retail park in Redhill suitable for such bulky goods operators is Brighton Road Retail Park, although market research has identified that the only unit currently on offer, the old Mercedes-Benz showroom, is too small to meet current retailer requirements.</p>	<p>No change</p>
<p>would not like to see this site change use. It is great for small businesses with relatively low rents.</p>	<p>Noted - The site allocation requires a relocation strategy for existing business/industrial occupiers</p>	<p>No change</p>
<p>support the proposal, albeit it is perhaps drawn slightly too narrowly – reference could be made to leisure uses in addition to retail and residential, to provide greater flexibility over options for the site in future. Include reference to leisure uses in addition to those uses already listed.</p>	<p>It is not considered appropriate to include leisure on this site, this is a use which national policy indicates should be directed toward town centres, which this site is not within.</p>	<p>No change</p>

<p>Please can we build on this plot as high as possible to allow the space for parts of Redhill Brook to be opened-up again and not treated as an inconvenience to be buried. If we build-high on this site we would have the space to excavate some land back down to the natural stream level and providing a small linear sunken park and walkway with seating areas at the level of the stream. This could unify the new redevelopment as the stream flows though the plot and add value to the new development.</p>	<p>The site allocation has been updated as follows: • Design of development to explore opportunities to include enhancements to the culvert running through the site in order to incorporate and enhance the Green Infrastructure opportunities</p>	<p>The site allocation has been updated as follows: • Design of development to explore opportunities to include enhancements to the culvert running through the site in order to incorporate and enhance the Green Infrastructure opportunities</p>
<p>Any development of this site should not prejudice the possibility of constructing a railway “flyover” allowing trains on the North Downs line to bypass Redhill.</p>	<p>We have discussed this with Network Rail and they have confirmed the following that this site does not need to be safeguarded.</p>	<p>No change</p>
<p>the proposal for bulky goods retail provision through extension of the warehouse area implies the need for significant parking, which would undermine the residential opportunity in this area.</p>	<p>Noted. Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No change</p>
<p>The DMP proposes this site considered up to eight storeys. We would consider this to be a maximum, on the parts of the site adjacent to the railway. Such an approach could enable the site to be able to accommodate of the order of 300-400 units, together</p>	<p>The site is considered to be able to accommodate around 150 units plus retail uses. The exact height will need to be designed and justified through a planning application</p>	<p>No change</p>

with ground floor retail and commercial frontages to Brighton Road.		
A higher standard of insulation should be required, in part to reduce the impact of train noise, and therefore improve quality of life for residents.	The site allocation requires design to ensure satisfactory residential amenity due to proximity to railway line and Redhill air quality management area, including appropriate noise reduction measures.	No change

ERM1		
<p>ERM1: The Hillsbrow site south of the A25 is part of the Greensand Ridge a prominent, often wooded, escarpment which runs through Sussex, Surrey and Kent. Parts of it are in the South Downs National Park, the Surrey Hills Area of Outstanding Natural Beauty and the Kent Downs Area of Outstanding Natural Beauty. The part running east of Redhill into Tandridge has no less natural beauty than these other, protected, sections. Although it is claimed to be of low grade within the Green Belt it forms part of the Greensand ridge and does form part of the boundary of the urban area of Redhill.</p> <p>This section of the Greensand Ridge appears as a well wooded ridge when seen from the north or south, even though at</p>	<p>The Council is not aware of the proposed ERM1 development potentially invalidating any aspect of the AONB designation. The area has not been proposed for consideration as an extension of the AONB, and the AONB Board did not raise this issue with us in their own consultation response.</p> <p>In accordance with Policy NHE2, all developments will be expected to demonstrate that they have not damaged biodiversity, and have preferably achieved a net gain in biodiversity. The most environmentally valuable parts of the area are dense woodland, some of which are ancient - these would be excluded from development, as stated in the draft DMP document.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan (and not through a planning application). Land will therefore not continually be released. Government policy</p>	No change

<p>Hillsbrow – the highest point of the Greensand Ridge within our Borough, the belt of trees at the top is very thin. Views from the AONB must be protected. Building housing along the north slope up to the top of the ridge would destroy the landscape feature of a wooded ridge line.</p>	<p>identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.</p> <p>Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt. The Green Belt designation does not take into consideration the aesthetics or quality of the land. One of the main criteria for identifying sites which could potentially be developed is whether they are sustainable or not.</p> <p>Reference to need to consider Greensand Ridge has been included in the policy. The site allocation also requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the adjacent Holmesdale Biodiversity Opportunity Area and the Greensand Ridge.</li> <li>• Protection and enhancement of areas of ancient woodland and other areas of significant woodland, including provision of an appropriate buffer zone and long-term management proposals</li> <li>• Design measures to protect and enhance landscape quality, including building heights and massing which ensure the development is not visible in long-range views</li> </ul>	
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<p>can see that one of the proposed areas of housing is behind houses of Hillfield close near this reserve and near to our house. Will this access via Cavendish road alleyway to the reserve be taken away from us, and will the nature reserve itself be effected?</p>	<p>The footpath which runs along the side of the site and which continues into the nature reserve itself must be retained and the site allocation requires any development to:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the Holmesdale Biodiversity Opportunity Area, and Holmethorpe Site of Nature Conservation Importance and the Greensand Ridge.</li> <li>• Protection and enhancement of areas of significant woodland</li> <li>• Design measures to protect and enhance landscape quality, including building heights/massing and retention of open areas in visually sensitive locations, to minimise the visibility of development in long-range views</li> <li>• Layout to incorporate a buffer zone and improvements to the Redhill Brook corridor</li> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road and significant upgrades of the existing footpath east of Redstone Park (Foot Path No. 102 and Cycle Route 21)</li> <li>• Additional north-south pedestrian and cycle links through the site as an integral part of the design</li> <li>• A new, high quality public open space in the south of the site and play facilities</li> </ul>	<p>No change</p>
<p>This significant landscape feature should not be built on. It has already suffered from mineral extraction and was not restored to woodland as required by the planning conditions imposed. Both local and national plans require mineral sites to be fully restored. The designated land use is therefore still woodland, however it is</p>	<p>It is understood that the original planning application (and associated conditions requiring restoration of the site) was the remit of Surrey County Council. If a condition has not been complied with for over 4 years it is exempt from enforcement. NHE3 considers trees that are there, not that should be there. However, the following wording has been applied to the site allocation requirements:</p>	<p>following wording has been applied to the site allocation requirements:  Opportunities should be sought</p>



<p>currently being used as a commercial recreational use.</p> <p>This site should be restored, not developed in ways that permanently sterilise areas previously identified for restoration to woodland. Development of this site conflicts with NHE3 in this regard.</p>	<p>Opportunities should be sought to increase tree coverage where possible, particularly where this may help with mitigating any visual impact.</p>	<p>to increase tree coverage where possible, particularly where this may help with mitigating any visual impact.</p>
<p>The Hillsbrow site south of the A25 is part of the Greensand ridge. This is a significant landscape feature (denoted AONB into Tandridge) and should be recognised as a landscape feature to be protected in the plan, not built on.</p>	<p>This is designated AGLV rather than AONB in Tandridge and it does not immediately go into this designation as you leave the borough of Reigate &amp; Banstead. Reference to need to consider Greensand Ridge has been included in the site allocation.</p>	<p>Reference to need to consider Greensand Ridge has been included in the site allocation.</p>
<p>The site also should be mostly wooded as this was the restoration plan after the fullers earth was extracted. The removal of the trees which gives the site which the developers say make it 'developable' ignored this and the fact that both local and national plans require mineral sites to be fully restored. This was an ancient woodland, and should be so again. These sites (including the other two sites north of the A25 have significant views which can be seen from far and wide. How can you have an area of outstanding beauty or area of great landscape value if part of the landscape feature, woodland and countryside that runs unbroken to the East is built upon and housing become the</p>	<p>It is understood that the original planning application (and associated conditions requiring restoration of the site) was the remit of Surrey County Council. If a condition has not been complied with for over 4 years it is exempt from enforcement. However, the following wording has been applied to the site allocation requirements:</p> <p>Opportunities should be sought to increase tree coverage where possible, particularly where this may help with mitigating any visual impact.</p> <p>The site allocation also requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the adjacent Holmesdale Biodiversity Opportunity Area and the Greensand Ridge.</li> </ul>	<p>following wording has been applied to the site allocation requirements:</p> <p>Opportunities should be sought to increase tree coverage where possible, particularly where this may help with mitigating any visual impact.</p>

<p>dominant feature of this landscape instead?</p>	<ul style="list-style-type: none"> <li>• Protection and enhancement of areas of ancient woodland and other areas of significant woodland, including provision of an appropriate buffer zone and long-term management proposals.</li> <li>• Design measures to protect and enhance landscape quality, including building heights and massing which ensure the development is not visible in long-range views. Opportunities should be sought to increase tree coverage where possible, particularly where this may help with mitigating any visual impact.</li> </ul> <p>The Council is not aware of the proposed ERM1 development potentially invalidating any aspect of the AONB designation. The area has not been proposed for consideration as an extension of the AONB, and the AONB Board did not raise this issue with us in their own consultation response.</p>	
<p>It is not clear why this extension has been segregated into multiple parcels rather than one large extension to include ERM1, ERM2 and ERM3, with appropriate phasing set out.</p>	<p>ERM2/3 will be combined to create one site allocation going forward as they are controlled by the same land owner and are both restricted by the timings of the landfill. ERM 1 will remain as a separate site allocation given this is owned by a different land owner and is not restricted by operation of the landfill site</p>	<p>No change</p>

<p>Not happy that green belt land is being reserved as an urban extension site</p>	<p>National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. The Core Strategy identified Broad Areas of Search including East of Redhill. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release rather than being chosen because developers want to develop these sites. The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p>	<p>No change</p>
<p>However, if the site is to be included then more intensive development should be considered, the proposed approach of small scale development, which is then masked by retained woodland, does not constitute an efficient use of space and can only encourage further encroachment and creeping urbanisation of the adjoining countryside.</p>	<p>The level of development has been set taking account of the constraints on the site (including topography, views into and out of the site), the general density of development in the area and the need to safeguard land for a school. It is felt that the figure proposed strikes a balance between making best use of the land and delivering an appropriately designed development sensitive to its context.</p>	<p>No change</p>

Unsuitable as it's extremely steep	It is considered that a suitable design could be achieved. The actual design of a scheme would have to be set out in detail at the planning application stage	No change
Maybe this site could be used as a nature reserve and woodland park (it is already used for outdoor events etc. by Priory Events)	National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. The Core Strategy identified Broad Areas of Search including East of Redhill. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 & 2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release when options are considered as a whole borough wide, and rather than being chosen because developers want to develop these sites. The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.	No change
One of the areas was owned and quarried by Fullers Earth and there is a block on developments, due to the instability of the land.	All site allocations will still need to submit a planning application, details pertaining to elements such as stability of the land will be required at this stage.	No change

<p>TDC would like to raise concerns regarding the impact on the A25. It is noted that the development could warrant increase public transport services on the Nutfield Road, but this would not offset the additional private traffic, which is already at a high level.</p>	<p>Surrey County Council's 2017 Strategic Highways Assessment modelled and considered the potential cumulative impact of all planned development to 2031. Although its base-date is 2009, the highways network has been audited and updated to reflect the position at 2014.</p> <p>As it does not take into account potential for modal shift or improvements to sustainable transport modes (rail, bus, walking and cycling), nor any other mitigation, it represents a worse-case scenario. It is a strategic highway model, and is not able to consider the precise composition of a proposed development, its modal split, detailed access arrangements and any highways mitigation proposed to support it. This is more appropriately done at the planning application stage, through a developer's Transport Assessment, which includes more detailed modelling.</p> <p>Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated.</p> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	<p>No change</p>
<p>Traffic - The changes implemented by the council in recent years (in particular the junction of Noke Drive/ Redstone Hill and also changes to the roundabout outside Redhill Train Station) have resulted in unacceptable traffic build up along the A25 Redstone Hill (travelling north toward Redhill and backing up beyond Chanctonbury Chase) and also queuing on</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. However it is a strategic highway model, and is not able to consider the precise composition of a proposed development, its modal split, detailed access arrangements and any highways mitigation proposed to support it. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would</p>	<p>No change</p>

<p>Redstone Hollow. In the first instance this needs to be addressed for the current requirements. It then needs to be reviewed to see if/how the road system would cope with an increase in car owners in the area. The traffic congestion at the moment going down Redstone Hill into Redhill is so bad already some days it goes back as far as Nutfield this will only get far worse with the proposed housing and school traffic and noise pollution will be off the radar!</p>	<p>be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	
<p>Access - vehicular access would be onto the A25 or down through Redstone Hollow which also gets extremely congested. This part of the A25 is already very busy with traffic (including commercial vehicles from the landfill) and it is imperative that any proposal includes appropriate fore-thought regarding access to/from the site.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. However it is a strategic highway model, and is not able to consider the precise composition of a proposed development, its modal split, detailed access arrangements and any highways mitigation proposed to support it. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	<p>No change</p>
<p>Sight lines,intensity of different users</p>	<p>The site allocation requires • Safe highway access onto Nutfield Road, taking a co-ordinated approach with any other allocated development sites in the vicinity</p>	<p>No change</p>

<p>Creation of car dependent communities with primary school etc on a steep hill on edge of already heavily congested road network both dangerous and not green.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough’s Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation also requires:</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road with safe crossing points to access the footpath adjacent to Redstone Park (FP102)</li> <li>• Enhancement of the footpath adjacent to Redstone Hollow (FP530)</li> <li>• Local improvements to existing bus infrastructure/passenger facilities on Nutfield Road</li> <li>• Comprehensive initiatives to support and encourage sustainable travel</li> </ul>	<p>No change</p>
<p>The A25 heading east out of Redhill is a congested road, with heavy traffic and an above average number of lorries, much of which is travelling above the 30mph speed restriction. All the above sites propose vehicular exits and entrances directly onto the A25, adding to an already problematic and dangerous stretch of road. This is not</p>	<p>The site allocation requires • Safe highway access onto Nutfield Road, taking a co-ordinated approach with any other allocated development sites in the vicinity</p> <p>Policy also requires that any large development such as this should provide a transport assessment to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential</p>	<p>No change</p>

<p>a safe or sustainable proposal unless traffic calming methods are introduced, speed restrictions are enforced and visibility is improved.</p>	<p>mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	
<p>There is very little mention in the proposal of improving and/or encouraging other more sustainable methods of transport to reach the new development e.g. walking (designated footpaths), cycling (cycle routes) or bus (improved and affordable services). Currently the cycle path provision is poor, the pedestrian routes along the A25 unpleasant and the bus routes infrequent and expensive.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road with safe crossing points to access the footpath adjacent to Redstone Park (FP102)</li> <li>• Enhancement of the footpath adjacent to Redstone Hollow (FP530)</li> <li>• Local improvements to existing bus infrastructure/passenger facilities on Nutfield Road</li> <li>• Comprehensive initiatives to support and encourage sustainable travel</li> </ul>	<p>No change</p>
<p>Rain water run off. Significant investment needs to be secured to ensure appropriate infrastructure to accommodate extra rain water running from the new development. The area of the A25 at the proposed development site already experiences severe flooding to the road. In addition, the drainage to the west at the foot of Redstone Hill (outside the Toby Carvery/Premier Inn) regularly has a blown drain cover following heavy rainfall – this is an existing problem and as the drain cover is in the middle of the road it is extremely dangerous. Its only a matter of time before there's a serious accident. There needs to</p>	<p>National policy requires that sites over 1 hectare (such as this site) must carry out a site specific Flood Risk Assessment setting out how any surface water flooding issues will be addressed. The site allocation requires development to include measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</p>	<p>No change</p>



<p>be provision to accommodate current water run-off and any additional run off from the proposed development.</p>		
<p>Wildlife - The area already attracts a wide range of wildlife including deer, bats, toads, badgers, foxes - reducing their habitat would be a negative. Development area should be reduced.</p>	<p>National policy and the policies proposed in the DMP requires development to make best use of land whilst also providing for important elements such as open space, increases to biodiversity where possible, protection for trees/hedges etc. The site allocation states that development must:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the adjacent Holmesdale Biodiversity Opportunity Area.</li> <li>• Protection and enhancement of areas of ancient woodland and other areas of significant woodland, including provision of an appropriate buffer zone and long-term management proposals</li> <li>• Design measures to protect and enhance landscape quality, including building heights and massing which ensure the development is not visible in long-range views</li> </ul> <p>Many species are protected so any planning application would have to adhere to the necessary procedures associated with these to ensure they are appropriately protected</p>	<p>No change</p>

<p>Ancient woodland - the current proposal recognises that there is ancient woodland to the south of the A25 which is to be preserved in the proposal. However, this appears to fall within the development boundary and therefore is not assured. To avoid the possibility of development of the area it would make better sense to narrow the site by bringing the westerly boundary further east (perhaps in line with the allotment).</p>	<p>Ancient woodland is given a large level of protection by national and local planning policy. The site allocation states that to make development suitable it would require:</p> <ul style="list-style-type: none"> <li>• Protection and enhancement of areas of ancient woodland and other areas of significant woodland, including provision of an appropriate buffer zone and long-term management proposals</li> </ul>	<p>No change</p>
<p>Some of the wooded areas are on very steep ground – possibly too steep to develop on. This being the case it would make more sense (from an environmental view point) to adjust the boundary so that this area was not part of the development.</p>	<p>It is considered that a suitable design can be achieved. Some of the trees are Ancient woodland which the site allocation requires must be protected with a suitable buffer. Other important trees will be required to be retained in accordance with policy NHE3. Development will be required to provide open space as well to minimum standards set out in Policy OSR2</p>	<p>No change</p>
<p>Listed/ Heritage Buildings require a sense of place rather than being surrounded and overlooked by housing estates and major highways.</p>	<p>The site allocation requires development to include:</p> <ul style="list-style-type: none"> <li>• Design measures to protect the setting of adjoining listed buildings and respect the character of Nutfield Road</li> </ul>	<p>No change</p>
<p>Damage to unfettered views from buildings of historical relevance.(e.g. Birthplace of</p>	<p>The site allocation requires: Design measures to protect and enhance landscape quality, including building heights/massing and retention of open areas in visually sensitive locations, to minimise the visibility of development in long-range views</p>	<p>No change</p>

Clair James Grece the first Town Clerk of Reigate)		
A public footpath across Hillsbrow might enhance public appreciation. Many people do not know this exists in its wildness.	<p>The site allocation requires development to provide:</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road with safe crossing points to access the footpath adjacent to Redstone Park (FP102)</li> <li>• Enhancement of the footpath adjacent to Redstone Hollow (FP530)</li> </ul>	No change
Public footpaths and cycle ways are well used and must be maintained.	<p>The site allocation requires development to provide:</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road with safe crossing points to access the footpath adjacent to Redstone Park (FP102)</li> <li>• Enhancement of the footpath adjacent to Redstone Hollow (FP530)</li> </ul>	No change
I would like Hillsbrow to be last on the list, as it is so wild, and we need a bit of wilderness	Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.	No change

<p>IF this development takes place then we should aim to make it exceptional in it's aims, reach and impacts. To make it a benchmark that other places aspire to.</p>	<p>National policy does specify that policies cannot be too prescriptive but the policies in the adopted Core Strategy and the emerging DMP require high quality development, as do the site specific requirements for urban extensions.</p>	<p>No change</p>
<p>object to building on green belt. There is already too little green space.</p>	<p>National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. The Core Strategy identified Broad Areas of Search including East of Redhill. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release rather than being chosen because developers want to develop these sites. The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt. As part of the development, open space will be required.</p>	<p>No change</p>

<p>The noise levels will be increased and the views completely done, why and how is it possible for this part of the green belt to be built on?</p>	<p>National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. The Core Strategy identified Broad Areas of Search including East of Redhill. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release rather than being chosen because developers want to develop these sites. The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p>	<p>No change</p>
<p>Can the old nightclub site not be used to accommodate some of these houses or any other disused buildings not on a green belt area! The sorting office, the land by Pets at home and I'm sure many more! The sites East of Redhill have high value environment value and should be protected not built on.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p>	<p>No change</p>

	<p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>This is the view from my front door surely the residents that already have purchased houses in this area should have a say as the views were one of the reasons we bought!! This will I'm sure dramatically decrease the property values!</p>	<p>The planning portal notes "A material consideration is a matter that should be taken into account in deciding a planning application or on an appeal against a planning decision. However, issues such as loss of view, or negative effect on the value of properties are not material considerations."  <a href="http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf">http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf</a></p>	<p>No change</p>

<p>Development of this site is also in conflict with proposed policy NHE2.</p>	<p>NHE2 requires development to:</p> <p>4) Throughout the borough and especially within Biodiversity Opportunity Areas, development proposals will be expected to:</p> <p>a) Retain and enhance other valued priority habitats and features of biodiversity importance; and</p> <p>b) Be designed, wherever possible, to achieve a net gain in biodiversity (e.g. by using green roofs and bird and bat boxes). Where a development will impact on a priority habitat or species, and mitigation cannot be provided on site in an effective manner, developers may be required to offset the loss by contributing to appropriate biodiversity projects elsewhere, in a location agreed with the Council.</p> <p>Details of the impact a scheme would have and how this would be mitigated would be considered at the planning application stage when detailed proposals are submitted.</p>	<p>No change</p>
<p>The proposed sites will inevitable increase Redhill's 'sprawl', blurring the currently distinctive boundary between the town and neighbouring villages and encroaching into agricultural land which currently delineate the town from the countryside.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The</p>	<p>No change</p>

sites will then be released in a phased manner.

The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 & 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released.

Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land. The site has a relatively low overall priority for protection – Rank 5 (5 lowest, 1 highest). In particular, the land parcel is identified as having strong, defensible boundaries meaning that its development would have a relatively limited impact on urban sprawl and settlement separation.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.



<p>The proposed sites support areas rich in wildlife including bats, raptors and reptiles and provide important habitat links ('corridors') between other local sites (some of which are designated e.g. Spinneys Mere). Any proposed development should include mitigation of potential habitat and species loss.</p>	<p>NHE2 requires development to:</p> <p>4) Throughout the borough and especially within Biodiversity Opportunity Areas, development proposals will be expected to:</p> <p>a) Retain and enhance other valued priority habitats and features of biodiversity importance; and</p> <p>b) Be designed, wherever possible, to achieve a net gain in biodiversity (e.g. by using green roofs and bird and bat boxes). Where a development will impact on a priority habitat or species, and mitigation cannot be provided on site in an effective manner, developers may be required to offset the loss by contributing to appropriate biodiversity projects elsewhere, in a location agreed with the Council.</p> <p>Details of the impact a scheme would have and how this would be mitigated would be considered at the planning application stage when detailed proposals are submitted.</p>	<p>No change</p>
<p>Site ERM1 will be very visible from the North Downs looking south; destroying the natural beauty of this area and detracting from the enjoyment of the designated Greensand Ridge.</p>	<p>The site allocation requires • Design measures to protect and enhance landscape quality, including building heights and massing which ensure the development is not visible in long-range views</p>	<p>No change</p>
<p>It is not difficult to imagine a scenario where urban sprawl between this site and the Watercolours development could be easily foresaw with any remaining greenbelt being completely eradicated.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver</p>	<p>No change</p>

the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.

The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 & 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released.

Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land. The site has a relatively low overall priority for protection – Rank 5 (5 lowest, 1 highest). In particular, the land parcel is identified as having strong, defensible boundaries meaning that its development would have a relatively limited impact on urban sprawl and settlement separation.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.

<p>ERM1 through the ERM3 include c300 new units, with a further c200 on RTC3 and RTC4. This represents c20% of the total dwellings in the RH1 4 post code area and is therefore a material urbanisation of an area which has a distinct character of 1920-40s low density family houses.</p>	<p>The density of the sustainable urban extensions will be informed by the surrounding context. For example, policy DES1 requires that new development provides an appropriate transition from urban to rural, as well as other policy stipulation to provide a good quality development. Proposed policy DES5 seeks to ensure a range of housing types and tenures is provided on new developments. However, should the density be lowered drastically on the proposed sustainable urban extension sites then further Green Belt release may be required.</p>	<p>No change</p>
<p>The lack of development north of the M25 (e.g. Chipstead, Banstead and Kingswood) is questionable. Such areas are closer to London and the A217 is a dual carriage way north of the M25, the A217 and A25 are single carriageway roads, therefore I am at a loss as to how the local infrastructure is insufficient to support capacity here but is sufficient for the greenbelt extensions in Redhill and Reigate.</p> <p>With respect of the greenbelt itself, I believe that the volume of protected greenbelt in the Northern half of the borough, when compared to the southern half is not reflective of the view of the locals. For example, the land between Banstead and Kingswood feels no more worthy of protection than that south of</p>	<p>The north of the borough is very constrained by key constraints such as Areas of Outstanding Natural Beauty which are given an additional level of protection from development than Green Belt, it is not due to infrastructure. Areas of Outstanding Natural Beauty are not set by the borough Council.</p>	<p>No change</p>

Reigate/Redhill.		
Developing the mail depot and Cole Brook in addition will further compound the problems and represents c20-25% of the entire Borough's provision being build in a single isolated area.	The Royal Mail site is no longer included in the DMP as they have requested it is removed. A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).	Royal Mail have requested this site is removed from the DMP as they have no intention to redevelop the site
I have recently purchased 39 Woodside Way, Redhill. RH1 4DD and the local adjoining woodland. I have attached the Transfer of Part dated 29 <sup>th</sup> Nov 2016 indicating the extent of the land. The land seems to fall within the Potential Reserve Urban Extension Site – Land at Hillsbrow, Redhill (document ERM1). As the new owner of the land, can I ask you please to remove the area in question from your development plans.	Thank you for clarifying this - this has been amended	Site boundary amended
Concern about whether sufficient account has been taken of other infrastructure and service requirements.	Reigate & Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.	No change

<p>ERM1 - request that the two small low density housing estates suggested are removed from the consultation plans and the planning gain for allowing medium density housing on the site is used to ensure that the upper wooded slope of the Greensand ridge is replanted.</p> <p>Reason 1. Council planners are graphically recommending above that a housing estate is suited to be built immediately next to ancient woodland. This surely needs to be changed? Reason 2; The landscape damage is not worth the small number of units estates here would produce Reason 3; The height and visibility of these two proposed top-of-the-ridge development plots Reason 4. The Greensand Ridge is a valued and well protected landscape feature on a national scale Reason 5. The far-reaching visual damage that building on the ridge-top will cause. Reason 6. It is not sustainable to encourage speculators to buy such nationally important woodland landscapes and bulldoze housing estate plots out of them Reason 7. How can commitments to restore landscapes after quarrying be credible or sustainable, when these restoration commitments are invariably broken? Reason 8. If these tiny developments are allowed at the very top of the ridge, then our Greenbelt boundary</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released.</p> <p>Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt. The site has a relatively low overall priority for protection – Rank 5 (5 lowest, 1 highest). In particular, the land parcel is identified as having strong, defensible boundaries meaning that its development would have a relatively limited impact on urban sprawl and settlement separation.</p> <p>National Planning Policy Framework paragraph 83 says that</p>	<p>No change</p>
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<p>may be no longer be as defensible? Reason 9. It is not sustainable for the planning system encourage land speculators to maintain long-term wasteground, instead of allowing active agriculture Reason 10. Allowing the top two small housing estates may increase pressure for Tandridge to allow development next to Redhill Reason 11. Without the destroyed woodland buffer being restored, the trees along the Greensand Ridgeline have no support and will decline.</p>	<p>Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Tandridge would also have to take into account the purposes of the Green Belt when identifying areas for development.</p> <p>Site allocation requires:</p> <ul style="list-style-type: none"> <li>• Protection and enhancement of areas of ancient woodland and other areas of significant woodland, including provision of an appropriate buffer zone and long-term management proposals</li> <li>• Design measures to protect and enhance landscape quality, including building heights and massing which ensure the development is not visible in long-range views</li> </ul>	
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ERM1 and 3		
<p>Reluctant to see this site developed but perhaps a small well designed housing development might be acceptable. It may have a low ranking but it is still green belt. If it is to be developed it should be considered for a Redhill park and ride.</p>	<p>The various proposed policies in the DMP require good design of new development. For example Policy DES1 requires that new development provides an appropriate transition from urban to rural, as well as other policy stipulation to provide a good quality development. Proposed policy DES5 seeks to ensure a range of housing types and tenures is provided on new developments.</p> <p>National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of</p>	<p>No change</p>

	<p>housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released.</p> <p>A park and ride is not considered a suitable use for this site</p>	
<p>It is essential that there is a clear sequence of programmed development and infrastructure, with background work on the early sites sufficiently advanced to be brought forward quickly if required so that other Green Belt sites are not lost.</p>	<p>Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.</p>	<p>No change</p>

<p>Not suitable - limited infrastructure in the area, and the junction by the station is already over capacity.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
<p>The proposed developments represent urban sprawl, extending Redhill at its Eastern boundary towards Nutfield.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to</p>	<p>No change</p>



be released.

Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land. The site has a relatively low overall priority for protection – Rank 5 (5 lowest, 1 highest). In particular, the land parcel is identified as having strong, defensible boundaries meaning that its development would have a relatively limited impact on urban sprawl and settlement separation.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.

ERM2

<p>The landfill site, which I understand will continue in use for many years to come, requires an adequate buffer zone separating it from houses.</p>	<p>The site allocation for ERM2/3 requires • Appropriate buffer zone to the adjoining landfill and mitigation measures to safeguard residential amenity</p>	<p>No change</p>
<p>Biffa wasteland site should have no further urban development built near it/beside it/below it. A site that has countless odour issues, countless so called 'recycling' lorries roaring through and around it, and which is, however well managed, a severely blighted, compromised and horrible area of land - with contamination issues which will stretch way into the future, however well controlled/managed..... !</p> <p>It is a continuing scandal, as it continues to be used as a dumping ground, and will continue to be used seemingly until....2030....!?!? I presume that everyone involved in these planning decisions will have been up there to look around the place? I have had the pleasure. I have a major issue with the extraordinary proximity of this ever expanding site to Redhill, and therefore an issue with those who allowed, and continue to allow, such a place to be used.</p> <p>I cannot see why increased recycling, and other landfill sites, which are obviously</p>	<p>Surrey County Council are responsible for waste planning - more information can be found here - <a href="https://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-waste-plan">https://www.surreycc.gov.uk/environment-housing-and-planning/minerals-and-waste-policies-and-plans/surrey-waste-plan</a></p> <p>RET1 is to do with managing development within identified retail frontages</p> <p>The site allocation for ERM2/3 requires • Appropriate buffer zone to the adjoining landfill and mitigation measures to safeguard residential amenity</p>	<p>No change</p>

<p>undesirable, but sadly still required for the time being, can't be used as alternatives to the Redhill site!? Everyone involved in 'the Plan' should, as a matter of urgency, take a trip to the site, to see it for themselves, if they haven't already, in order to fully appreciate the proximity of this huge and growing wasteland to the town.</p> <p>RET 1 - 'Protect and where possible enhance' (the environment) (Page 27). If you believe that by putting a thin veneer of soil, and planting grass seed, over the top of decades of waste/rubbish/decay/contamination will make Redhill a green and pleasant land come 2030, I suggest you come and live at Water Colour or Park 25....or wherever you intend to build yet more homes (to the East of Redhill).</p> <p>Could be potentially under an increased number of Gatwick flight paths (if Gatwick were to get a second runway);</p>		
<p>EMR2 and EMR3 are built on Landfill and back directly onto existing quiet neighbourhoods with proposed high density housing. This is not in keeping with the local characteristics of the area and should be reduced to medium or low density if the scheme is to be considered.</p>	<p>The density of the sustainable urban extensions will be informed by the surrounding context. For example, policy DES1 requires that new development provides an appropriate transition from urban to rural, as well as other policy stipulation to provide a good quality development. Proposed policy DES5 seeks to ensure a range of housing types and tenures is provided on new</p>	<p>No change</p>

	developments. However, should the density be lowered drastically on the proposed sustainable urban extension sites then further Green Belt release may be required.	
Furthermore, placing aged individuals in sheltered or supported living on the outskirts of Redhill is unlikely to improve their quality of live, given the distance to the town centre.	The site allocation requires • Local improvements to existing bus infrastructure/passenger facilities on Nutfield Road. The site allocation also stipulates that provision is for extra care/retirement facilities, elderly accommodation covers a wide range of needs and preferences, it can apply to those who are still very active but want to downsize.	No change
The Watercolours residents already complain about the smell from landfill sites and this is well documented in local media outlets. Given the proximity to the landfill site, it is not difficult to conceive a larger problem that that reported by Watercolour residents being present.	The site allocation for ERM2/3 requires • Appropriate buffer zone to the adjoining landfill and mitigation measures to safeguard residential amenity	No change
Who would want to live so close to a landfill site I can only imagine the poor people in social and council housing being put there.	Policy DES4 seeks a mix of housing must be provided as part of any development, as such this development would comprise both market and affordable housing. The site allocation requires development to provide an appropriate buffer zone to the adjoining landfill and mitigation measures to safeguard residential amenity. The phasing of the site has also been set taking account of when the landfill is set to cease occupation.	No change
Existing public footpaths appear to being lost in ERM2 and ERM3, a direct	The reason is correct, if this area is included in the site boundary then there is more capacity for these areas to	No change

<p>contradiction to the wider policy paper and adversely impacting existing homeowners enjoyment.</p>	<p>be improved as part of a comprehensive scheme covered under one planning application . There is potential for these footpaths to be improved further to provide a better sustainable network (i.e. better surfacing for enhanced cycle provision). The site requirements also require:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the Holmesdale Biodiversity Opportunity Area, and Holmethorpe Site of Nature Conservation Importance and the Greensand Ridge.</li> <li>• Protection and enhancement of areas of significant woodland</li> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road and significant upgrades of the existing footpath east of Redstone Park (Foot Path No. 102 and Cycle Route 21)</li> <li>• Additional north-south pedestrian and cycle links through the site as an integral part of the design</li> <li>• A new, high quality public open space in the south of the site and play facilities</li> </ul>	
<p>The Copyhold site and adjacent field site to the north of the A25 is a SNCI. This means the local Council is tasked with protecting (and improving) this area and its nature conservation value - not building on it.</p>	<p>An ecology survey has previously been undertaken for this site and this concluded that the "Western Field does not play any significant role in supporting ecological features for which the SNCI was designated, nor does it support other ecological features of sufficient value either individually or collectively to warrant inclusion in the SNCI designation in their own right. Furthermore, the habitats that are present do not appear to be providing any supporting value for features that comprise any significant</p>	<p>No change</p>

	<p>contributory or supporting value to the SNCI."</p> <p>However, it does note that there are features of ecological value that would need to be avoided, mitigated or compensated for. Proposed policy NHE2 states that:</p> <p>2)3) Development that is likely to have an adverse effect upon within or adjacent to any site designated as a Site of Nature Conservation Importance, Regionally Important Geological Site or Local Nature Reserve will only be granted where:</p> <p>a) The need for, and benefits of, the development on that site clearly outweigh the impacts on nature and geological conservation features and community value; and</p> <p>b) It is demonstrated that adequate mitigation of or, as a last resort, compensation for, the impact of the development will be put in place</p> <p>At a detailed planning application stages policy NHE2 would have to be adhered to.</p>	
<p>These two sites are also part of the Holmesdale Woods Biodiversity Action Area that runs east of Redhill. This means if this is lost it must be compensated for elsewhere. This has not been proposed.</p>	<p>Section 1.3 of the document "Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network" states the following:</p> <p>"It is important to note however, that this does not preclude all development within a BOA; these are primarily spatial planning tools to focus and realise opportunities, not offer further superfluous constraint. As with any eligible development, proposals within or adjacent to a BOA would be required to deliver biodiversity enhancements, but within a BOA such</p>	<p>No change</p>

enhancements will be most effective when they are tailored to meet the stated objectives of that BOA. As ever, the scale of enhancements should be guided by the size and impact of the development; their achievability must be assured and they may also draw on the multiplier metrics currently being piloted to guide Biodiversity Offsetting."

The guidance does not outright require compensation elsewhere, it is an example of how impacts could be mitigated. This would be considered at the planning application stage

The site allocation requires: delivery of biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the Holmesdale Biodiversity Opportunity Area and Holmethorpe Site of Nature Conservation Importance; Protection and enhancement of areas of significant woodland; and Layout to incorporate a buffer zone and improvements to the Redhill Brook corridor

Policy NHE2 also requires:

- 4) Throughout the borough and especially within Biodiversity Opportunity Areas, development proposals will be expected to:
  - a) Retain and enhance other valued priority habitats and features of biodiversity importance; and
  - b) Be designed, wherever possible, to achieve a net gain in biodiversity (e.g. by using green roofs and bird and bat boxes). Where a development will impact on a priority habitat or species, and mitigation cannot be provided on

	<p>site in an effective manner, developers may be required to offset the loss by contributing to appropriate biodiversity projects elsewhere, in a location agreed with the Council.</p>	
<p>Open space at the south of the site Inclusion of this is welcome, but I am concerned that if there is no specific reference to the size of this space at this stage, it will be reduced in any final development. Include reference to how large the public space should be.</p>	<p>Public space for larger development such as this will agreed on a case by case basis, however, they will have to accord with the minimum requirements set out in Policy OSR2 which requires:</p> <p>1) New housing developments will be expected to make suitable provision for public open space, children’s play and outdoor sport facilities in accordance with the following minimum standards:</p> <p>a) On sites of 25 or more net additional dwellings, amenity space should be provided at a standard of 0.72ha/1,000 people</p> <p>b) On sites of 40 or more net additional dwellings, formal equipped play space should be provided at a standard of 0.25ha/1,000 people</p> <p>c) On sites of 300 or more net additional dwellings, outdoor sport provision should be provided at a standard of 1.6ha/1,000 people</p> <p>The above standards should be taken as a minimum but may vary on a case by case basis taking into account the specific circumstances. Open space details should be set out in a development brief where relevant.</p>	<p>No change</p>



<p>Concern about possible impact on views from the AONB, including Gatton Park.</p>	<p>The Council is not aware of the proposed ERM1 development potentially invalidating any aspect of the AONB designation. The area has not been proposed for consideration as an extension of the AONB, and the AONB Board did not raise this issue with us in their own consultation response. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Design measures to protect and enhance landscape quality, including building heights and massing which ensure the development is not visible in long-range views</li> </ul>	<p>No change</p>
<p>Concern about possible impact on the highway system as the A25 is already heavily congested at peak periods.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	<p>No change</p>
<p>Concern about whether sufficient account has been taken of other infrastructure and service requirements.</p>	<p>Infrastructure and service requirements are considered borough wide, taking account of all projected development. An example of measures taken to support infrastructure for this site is the safeguarding of land for a school should this be required at the point of time that a planning application is submitted for this site. Infrastructure is covered in detail in the Infrastructure Delivery Plan</p>	<p>No change</p>

<p>I ask to move the proposed red hatched area to only enclose the developer’s site &amp; not enclose two footpaths and the public countryside on either side of the plot. A council planner has suggested a reason the council has enclosed these two footpaths &amp; the publicly owned countryside on two sides of the development plot within the boundary of their new proposed RUES, was to allow the developers to improve these footpaths. However these two footpaths have recently been improved to a high standard, so they would gain nothing from having a theoretical option to get yet more improvements. But even if improvements do happened to be needed, then normal planning gain can cover it. I am concerned that the small area of public countryside between the developer’s plot and the railway line may be made vulnerable at a later date by this hatched area being left where it is.</p>	<p>The reason is correct, if this area is included in the site boundary then there is more capacity for these areas to be improved as part of a comprehensive scheme covered under one planning application . There is potential for these footpaths to be improved further to provide a better sustainable network (i.e. better surfacing for enhanced cycle provision). The site requirements also require:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the Holmesdale Biodiversity Opportunity Area, and Holmethorpe Site of Nature Conservation Importance and the Greensand Ridge.</li> <li>• Protection and enhancement of areas of significant woodland</li> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road and significant upgrades of the existing footpath east of Redstone Park (Foot Path No. 102 and Cycle Route 21)</li> <li>• Additional north-south pedestrian and cycle links through the site as an integral part of the design</li> <li>• A new, high quality public open space in the south of the site and play facilities</li> </ul>	<p>No change</p>
<p>Planners have highlighted the need for a wide bunded screen to shield the new development from the site next door site (the brown hashed line), but they do not highlight any screen to shield this country footpath linking Redhill to Merstham from a packed housing estate perhaps 3 of 4 feet away.</p>	<p>The site allocation requires • Layout to incorporate a buffer zone and improvements to the Redhill Brook corridor. This is considered an appropriate requirement to separate the footpath from the development.</p>	<p>No change</p>

<p>can the north west part of ERM2 be designated as an urban open space?</p>	<p>Policy OSR2 states that open space in new developments, once provided, will be treated as though designated as urban open space and policy OSR1 will apply.</p>	<p>No change</p>
<p>It is essential that there is a clear sequence of programmed development and infrastructure, with background work on the early sites sufficiently advanced to be brought forward quickly if required so that other Green Belt sites are not lost.</p>	<p>Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.</p>	<p>No change</p>
<p>This is a green break that should be preserved as green space for the growing population of central Redhill - there is already too little green space</p>	<p>National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. The Core Strategy identified Broad Areas of Search including East of Redhill. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release when options are considered as a whole borough wide, and rather than being chosen because developers want to develop these sites. The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be</p>	<p>No change</p>

	<p>released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p> <p>The site allocation requires that development must provide a new, high quality public open space in the south of the site and play facilities.</p>	
<p>Not suitable - limited infrastructure in the area, and the junction by the station is already over capacity.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
<p>Public footpaths and cycle ways are well used and must be maintained. The proposal shows the development incorporates the pedestrian paths and cycleway (Route 21). These areas are of particular importance and it seems logical to adjust the boundaries so that these important access points aren't part of the development.</p>	<p>The site allocation requires that development must deliver:</p> <ul style="list-style-type: none"> <li>- Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road and significant upgrades of the existing footpath east of Redstone Park (Foot Path No. 102 and Cycle Route 21)</li> <li>- Additional north-south pedestrian and cycle links through the site as an integral part of the design</li> </ul>	<p>No change</p>

<p>The sites are not ideally situated: they are off a busy main road (the A25) up a steep hill. The road is already congested (more so since the road system was changed in Redhill) with a lot of heavy traffic, ie. trucks using the landfill site throughout the entire day. Pushing additional traffic down this already dangerous road in the form of houses or people accessing a public open space would exacerbate existing problems.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	<p>No change</p>
<p>This would effect the landscape feature of this part of the Greensand Ridge that should link in to the similar areas in Tandridge which are already protected. There is a preliminary assessment by Natural England for it to be designated an AONB.</p>	<p>The Council is not aware of the proposed ERM1 development potentially invalidating any aspect of the AONB designation. The area has not been proposed for consideration as an extension of the AONB, and the AONB Board did not raise this issue with us in their own consultation response.</p> <p>Reference to need to consider Greensand Ridge has been included in the policy. The site allocation also requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the adjacent Holmesdale Biodiversity Opportunity Area and the Greensand Ridge.</li> <li>• Protection and enhancement of areas of ancient woodland and other areas of significant woodland, including provision of an appropriate buffer zone and long-term management proposals</li> <li>• Design measures to protect and enhance landscape quality, including building heights and massing which ensure the development is not visible in long-range views</li> </ul>	<p>No change</p>

<p>The landfill site, which I understand will continue in use for many years to come, requires an adequate buffer zone separating it from houses.</p>	<p>The site allocation requires: • Appropriate buffer zone to the adjoining landfill and mitigation measures to safeguard residential amenity</p>	<p>No change</p>
<p>The area adjoining the Copyhold site is a nature reserve (The Moors) and has the Greenwich cycle path running through it. It has taken a long time for this area to be regenerated following the building of houses at Watercolour. The area to the north of the development (adjacent to the railway) is a wetlands area which has been developed to attract wildlife. It seems strange that following significant investment to create this area the council now believe it should be developed.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Layout to incorporate a buffer zone and improvements to the Redhill Brook corridor</li> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the Holmesdale Biodiversity Opportunity Area, and Holmethorpe Site of Nature Conservation Importance and the Greensand Ridge.</li> <li>• Protection and enhancement of areas of significant woodland</li> <li>• A new, high quality public open space in the south of the site and play facilities</li> </ul> <p>By including these elements within the boundary there is more capacity for the Council to require improvements to these</p>	<p>No change</p>
<p>Flooding. In recent year the bridle path and wetlands area have flooded. A new development is likely to create additional water run-off which would increase the likelihood of flooding to the area.</p>	<p>National policy requires that sites over 1 hectare (such as this site) must carry out a site specific Flood Risk Assessment setting out how any surface water flooding issues will be addressed. The site allocation requires development to include measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</p>	<p>No change</p>

<p>Contamination. Some of the land may be (or is) contaminated. Understandably, developers would have to address this as part of their own proposal to the council. However, chances of there being affordable housing seem to go down. There is a danger that this area will not include affordable housing, instead it will result in high cost commuter properties what won't serve the local people. Worse still it could turn in to a partially developed site that never gets finished.</p>	<p>Proposed policy DES6 seeks to require a higher amount of affordable housing contribution from greenfield sites. However, the Council also have to try to deliver their housing targets (460 homes a year). There would be a negotiation to ensure that a viable scheme can be achieved but with as much affordable housing as possible. Viability has been considered as part of the Development Management Plan process.</p>	<p>No change</p>
<p>The A25 is already struggling to cope with the volume of traffic. However, adding a school to the site could compound things even further. We won't just be concerned with the extra road users from the developments but also the increase in traffic as parents from the catchment area drive to deliver and collect their children each day. Wouldn't it be better to build a school more centrally. What about returning the site of the adult learning centre to its original use as a school (RTC5 - Former Longmead Centre, Holland Close, RH1 1HT)?</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>Taking account of viability, size of sites and education projections this site is considered to the most appropriate.</p>	<p>No change</p>
<p>TDC would like to raise concerns regarding the impact on the A25. It is noted that the development could warrant increase public transport services on the Nutfield Road, but</p>	<p>Surrey County Council's 2017 Strategic Highways Assessment modelled and considered the potential cumulative impact of all planned development to 2031. Although its base-date is 2009, the highways network has</p>	<p>No change</p>

<p>this would not offset the additional private traffic, which is already at a high level.</p>	<p>been audited and updated to reflect the position at 2014. As it does not take into account potential for modal shift or improvements to sustainable transport modes (rail, bus, walking and cycling), nor any other mitigation, it represents a worse-case scenario. It is a strategic highway model, and is not able to consider the precise composition of a proposed development, its modal split, detailed access arrangements and any highways mitigation proposed to support it. This is more appropriately done at the planning application stage, through a developer's Transport Assessment, which includes more detailed modelling.</p> <p>Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated.</p> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	
<p>The requirements to improve existing links is welcome, but I am concerned that by not explicitly mentioning the National Cycle Network (which is directly adjacent to the north of the site) and the bridge over the railway to Cavendish Road, it may be more difficult to require improvements to these critical links as part of any development. Add explicit reference to these links.</p>	<p>The site allocation has been updated to specifically refer to the national cycle network (which includes the bridge) and now states that development must deliver:</p> <ul style="list-style-type: none"> <li>- Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road and significant upgrades of the existing footpath east of Redstone Park (Foot Path No. 102 and Cycle Route 21)</li> <li>- Additional north-south pedestrian and cycle links through the site as an integral part of the design</li> </ul>	<p>No change</p>



<p>This land contributes significantly to the beauty and character of the area. The proposal here is to build homes on the immediate boundary of a landfill that has had historically a very high number of odour complaints. I do hope we can avoid building on this green belt land, for the sake of new and existing homeowners</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released.</p> <p>The site allocation requires: • Appropriate buffer zone to the adjoining landfill and mitigation measures to safeguard residential amenity</p>	<p>No change</p>
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ERM2/3		
<p>I have concerns about the noise levels the building works and access roads will undoubtedly create, in fact I am worried that the garden may actually become unusable due to noise levels and activity. I am also intrigued as to how the traffic (already often at standstill during rush hours) will be managed both during the build and afterwards when there are several more hundred cars joining the A25.</p>	<p>Policy DES11 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed. This should include the elements mentioned in this representation.</p> <p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	<p>No change</p>
<p>It is apparent that you have not yet exhausted all other options to develop on pre-existing urban areas and until that is the case, considering building on greenbelt is surely not viable? I am pleased to see you are encouraging the public to think of alternative sites, surely with the number of disused offices around Redhill there must</p>	<p>National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the</p>	<p>No change</p>

<p>be other options?</p>	<p>DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options.</p>	
<p>Not enough to set land aside for a school - must be a mandated development as part of any approval, otherwise the other schools in the area will become even more over-subscribed.</p>	<p>Although the work that we have done on projecting education requirements indicates that there is likely to be a need for a school in this area of the borough, this may not be the case should the site come forward nearer to the end of the plan period which runs until 2027. Other schools may have been built in the meantime as well. The need for a school must however be assessed at the point of this site coming forward in a planning application. The site allocation has been updated to read:</p>	<p>The site allocation has been updated to read:</p> <p>Serviced land set aside for a new two-form of entry primary school the need for which will be</p>

	<p>Serviced land set aside for a new two-form of entry primary school the need for which will be reassessed prior to submission of a planning application. If land is not needed, the need for an alternative community facility must be tested.</p>	<p>reassessed prior to submission of a planning application. If land is not needed, the need for an alternative community facility must be tested.</p>
<p>As the plan acknowledges, the site is allocated for waste management purposes in the Surrey Waste Plan 2008 and considered suitable for aggregates recycling. It is located adjacent to the Patteson Court landfill site. The potential urban extension to the east of Redhill appears to be one of the most sustainable options open to the Borough - should the release of green belt land be required for housing during the plan period. The broad location for the urban extension is already identified in the Local Plan Core Strategy and this includes the Copyhold site. Notwithstanding the continuing need for waste management capacity in Surrey, if the site should be required for residential development we would expect that the district and borough will work proactively with the county council to ensure that areas needed for additional waste management facilities can be appropriately located. In addition we would require that the impact of future residential development fully takes</p>	<p>From discussions with SCC it is understood that these sites are unlikely to be in the next iteration of the Waste Local Plan. Discussions with SCC are ongoing</p>	<p>No change</p>

in to account the potential impact of this residential development on the efficient operation of the adjoining Patteson Court waste management site and that suitable mitigation measures are adopted and implemented. The development of sensitive land uses (such as housing) close to operating waste management sites can cause problems for their efficient ongoing operation. It is therefore essential that any housing development on the former Copyhold Works site, including land to the west, does not prejudice the efficient operation of Patteson Court landfill and associated specialist waste management uses. This landfill site is of strategic importance and is currently programmed to be completed in 2027 and the site fully restored by December 2030.

Potential conflicts should be minimised by ensuring: 1) The release of housing land is phased in such a way to ensure that operations at Patteson Court are substantially completed before residential development takes place. The phased plan should ensure that any ongoing waste operations can be managed to minimise any potential conflict; and 2) Any continuing waste operations and site restoration works at Patteson Court are fully taken into account during the master

<p>planning of the urban extension. This would need to respond to the circumstances at the time, but may mean that a substantial buffer is in place and that higher density development is located towards the existing urban area and furthest away from the sensitive site boundary with the landfill site. The current indicative layout does not satisfactorily address these issues.</p>		
<p>The proposed development to the side of the land fill area in Redhill just off the A25 is of particular concern regarding parking and car use. The size of this area would mean that the potential residents would be largely car owning and in order to access the local amenities they would need to use their cars to even access the main road, not to mention the buses and railway station.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	<p>No change</p>
<p>An assessment needs to be undertaken on land contamination of the whole of that area prior to any development.</p>	<p>The site allocation requires • Full contamination survey and land remediation measures as appropriate</p>	<p>No change</p>

<p>The site boundary is shown incorrectly. The northern edge of the site is now woodland and contains a cycle route which is part of the National Cycle Network. This should be retained. This area was historically used for allotments; instead of housing it should be used to increase allotment provision close to central Redhill (where a lot of housing without gardens or outdoor amenity space has been recently completed, has planning permission or is proposed in the DMP).</p>	<p>The footpaths are included in the site boundary as there is then more capacity for these areas to be improved as part of a comprehensive scheme covered under one planning application . There is potential for these footpaths to be improved to provide a better sustainable network (i.e. better surfacing for enhanced cycle provision). The site requirements also require:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the Holmesdale Biodiversity Opportunity Area, and Holmethorpe Site of Nature Conservation Importance and the Greensand Ridge.</li> <li>• Protection and enhancement of areas of significant woodland</li> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road and significant upgrades of the existing footpath east of Redstone Park (Foot Path No. 102 and Cycle Route 21)</li> <li>• Additional north-south pedestrian and cycle links through the site as an integral part of the design</li> <li>• A new, high quality public open space in the south of the site and play facilities</li> </ul> <p>ERM1 site allocation requires:</p> <ul style="list-style-type: none"> <li>• Potential extension to existing allotment site</li> </ul>	<p>No change</p>
<p><b>ERM2 and 3</b> - These two sites are also both part of the Surrey Waste Plan. Part of the Copyhold site is required to be restored to countryside and green field status but a small amount of land is identified as a site for non-thermal waste treatment.</p>	<p>From discussions with SCC it is understood that these sites are unlikely to be in the next iteration of the Waste Local Plan. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Design measures to protect and enhance landscape quality, including building heights/massing and retention</li> </ul>	<p>No change</p>

<p>Alternative provision within existing industrial areas, such as Holmethorpe industrial estate could conflict with current uses (and high level of occupancy) of this area. The field site is included in the Surrey waste plan as a buffer between potential use of this site and existing homes. Such a buffer is not only needed in the future, it is needed now – the nearby landfill site is still in operation and causes frequent smell and dust problems to residents.</p>	<p>of open areas in visually sensitive locations, to minimise the visibility of development in long-range views</p> <ul style="list-style-type: none"> <li>• Appropriate buffer zone to the adjoining landfill and mitigation measures to safeguard residential amenity</li> </ul>	
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ERM3		
<p>Given its unsightliness from afar, dilapidated buildings, probably contamination and non-proximity to existing housing, I would actively welcome the redevelopment of this site. Wording in relation to prioritisation of the SUEs. Explore how development could be brought forward on this site, at least as the first SUE to be used, if not in advance of that.</p>	<p>Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.</p>	<p>No change</p>
<p>Concern about possible impact on the highway system as the A25 is already heavily congested at peak periods.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also</p>	<p>No change</p>



	allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).	
Concern about whether sufficient account has been taken of other infrastructure and service requirements.	Infrastructure and service requirements are considered borough wide, taking account of all projected development. An example of measures taken to support infrastructure for this site is the safeguarding of land for a school should this be required at the point of time that a planning application is submitted for this site. Infrastructure is covered in detail in the Infrastructure Delivery Plan	No change
It is essential that there is a clear sequence of programmed development and infrastructure, with background work on the early sites sufficiently advanced to be brought forward quickly if required so that other Green Belt sites are not lost.	Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.	No change
Not suitable - limited infrastructure in the area, and the junction by the station is already over capacity.	Reigate & Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan and the Transport Assessment on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.	No change

<p>The proposed developments represent urban sprawl, extending Redhill at its Eastern boundary towards Nutfield.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released.</p> <p>Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from</p>	<p>No change</p>
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	<p>encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land. The site has a relatively low overall priority for protection – Rank 5 (5 lowest, 1 highest). In particular, the land parcel is identified as having strong, defensible boundaries meaning that its development would have a relatively limited impact on urban sprawl and settlement separation.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>The sites are not ideally situated: they are off a busy main road (the A25) up a steep hill. The road is already congested (more so since the road system was changed in Redhill) with a lot of heavy traffic, ie. trucks using the landfill site throughout the entire day.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	No change
<p>The landfill site, which I understand will continue in use for many years to come, requires an adequate buffer zone separating it from houses.</p>	<p>The site allocation requires development to provide an appropriate buffer zone to the adjoining landfill and mitigation measures to safeguard residential amenity</p>	No change

<p>Copyhold Works should only be redeveloped for housing if not currently safeguarded by Surrey CC for waste infrastructure. Surrey has pressing needs for modern waste management infrastructure as landfill runs out and its use reduced in line with the EU Landfill Directive. Waste management is critical infrastructure in support of the Borough's homes and businesses, and strong reasons should be used if any existing SCC policies in favour of a waste use are to be overturned. You have a duty to discuss this meaningfully with Surrey CC a view to reaching agreement on the issue.</p>	<p>From discussions with SCC it is understood that these sites are unlikely to be in the next iteration of the Waste Local Plan. Discussions with SCC are ongoing</p>	<p>No change</p>
<p>TDC would like to raise concerns regarding the impact on the A25. It is noted that the development could warrant increase public transport services on the Nutfield Road, but this would not offset the additional private traffic, which is already at a high level. Further, Cormongers Lane is frequently used by those in north Redhill and those living at the Watercolour development, to access the A25 and to bypass Redhill town centre. Cormongers Lane is a narrow lane with 'blind' passing points, and which suffers from flooding. Whilst it is noted that the indicative masterplan does not suggest a main access onto/from Cormongers Lane the use of the lane would be exacerbated by additional vehicles in both directions. At</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road and significant upgrades of the existing footpath east of</li> </ul>	<p>No change</p>

the 'Watercolour' end of Cormongers Lane, on the RBBC side of the boundary and where it meets Nutfield Marsh Road, traffic calming measures are in place with restricted vehicle size. This is frequently ignored by oversized vehicles and lorries, and forces inappropriate diversion up past Mercers Lake Country Park and onto the narrow Church Hill, to regain access to the A25. Additional measures would need to be put in place to reduce this risk given the likely increase of vehicles.

In addition, surface water run-off from the new development, if not properly mitigated, would exacerbate the current flooding issues in that location for both the homes in the Nutfield Marsh location, and the road network. TDC would welcome a better understanding and engagement on any mitigation measures should RBBC progress this urban extension into a preferred approach.

Redstone Park (Foot Path No. 102 and Cycle Route 21)

- Additional north-south pedestrian and cycle links through the site as an integral part of the design
- Local improvements to existing bus infrastructure/passenger facilities on Nutfield Road
- Comprehensive initiatives to support and encourage sustainable travel
- Measures to manage the effects on nearby rural and residential roads, including Cormongers Lane/Fullers Wood Lane, from rat-running and re-routing
- Safe highway access onto Nutfield Road, taking a co-ordinated approach any other allocated development sites in the vicinity

National policy requires that sites over 1 hectare (such as this site) must carry out a site specific Flood Risk Assessment setting out how any surface water flooding issues will be addressed. The site allocation requires development to include measures to manage and reduce surface water run-off including a comprehensive system of SUDs. An updated Strategic Flood Risk Assessment Level 1 has been prepared to support the emerging Development Management Plan

<p>Clearly it could only be developed if the land west of Copyhold Works was also developed, Redhill. Given its location at a distance from the urban centre I doubt that it can be regarded as a sustainable extension.</p>	<p>The sites called ERM2 and ERM3 in the Regulation 18 version of the DMP have now been combined. The adopted Core Strategy identified Broad Areas of Search including East of Redhill. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release when options are considered as a whole borough wide. Any development would be expected to enhance opportunities for sustainability as well, for example the site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Nutfield Road and significant upgrades of the existing footpath east of Redstone Park (Foot Path No. 102 and Cycle Route 21)</li> <li>• Additional north-south pedestrian and cycle links through the site as an integral part of the design</li> <li>• Local improvements to existing bus infrastructure/passenger facilities on Nutfield Road</li> <li>• Comprehensive initiatives to support and encourage sustainable travel</li> </ul>	<p>No change</p>
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ERM4		
no objections to the development of the old Nuttings site on Bletchingley Road	Noted	No change

<p>Bridle ways and nature reserves in Merstham Ward (ERM4) need to be protected. There are better locations in alternatives for development.</p>	<p>The site allocation requires • Improvement and extension of pedestrian and cycle facilities, including new footways on Bletchingley Road and significant upgrades of the existing bridleway through the site (BW119)</p> <p>Proposed policy NHE2 protects nature reserves.</p> <p>The adopted Core Strategy identified Broad Areas of Search including East of Redhill. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release when options are considered as a whole borough wide.</p> <p>The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites.</p> <p>Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p>	<p>No change</p>
<p>ERM4 does not comply with DMP Objective SC1 as the proposed land is: part of Surrey's historic landscape, located at the boundary of the AONB and AGLV, within the green belt, and most importantly the ERM4 site identified as Landscape Character</p>	<p>SC1 is an objective, this will be delivered through policies DES1 - DES4</p>	<p>No change</p>

Areas 2015 in Surrey County Council's interactive map		
Excessive construction in the area already	National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. However, Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.	No change
Concern about possible impact on views from the AONB, including Gatton Park.	<p>The Council is not aware of the proposed ERM1 development potentially invalidating any aspect of the AONB designation. The area has not been proposed for consideration as an extension of the AONB, and the AONB Board did not raise this issue with us in their own consultation response. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Design and layout to enhance landscape quality, provide an appropriate transition to surrounding countryside and minimise visibility of the development in long range views</li> </ul>	No change
Concern about possible impact on the highway system as the A25 is already heavily congested at peak periods.	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any</li> </ul>	No change



	<p>improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</p> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p>	
Concern about whether sufficient account has been taken of other infrastructure and service requirements.	Reigate & Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.	No change
It is essential that there is a clear sequence of programmed development and infrastructure, with background work on the early sites sufficiently advanced to be brought forward quickly if required so that other Green Belt sites are not lost.	Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.	No change

<p>Bridlepath BW118: The footpath runs from Bletchingley Road to Nutfield Marsh Road and Mercers Lake is in constant use and is enjoyed by many people from in and around Merstham (runners, walkers, wildlife enthusiasts, cyclists, families, dog walkers etc.) and I feel that with the development of houses on either side of this public footpath/ surrey cycle way will severely damage the environment and destroy the habitat for all the wildlife living in this area. Please note, this is only to get to Spynes Nature Reserve and Mercers Lake from Merstham and so it is imperative that it is not changed, blocked, removed or redeveloped in any way.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, and an appropriate relationship with the adjoining nature reserve and reflecting the Holmesdale Biodiversity Opportunity Area</li> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Bletchingley Road and significant upgrades of the existing bridleway through the site (BW119)</li> </ul>	<p>No change</p>
<p>: As a resident of Woodlands Close, I strongly oppose to any access on our unadopted, resident owned road to any building works on the field behind Woodlands Close. This would ruin our cul-de-sac for several years. Heavy vehicles requiring access to Woodlands Close would most likely damage some of the Woodlands Close properties, as the road is not designed for construction traffic as it is too narrow. Woodland Close would most likely damage some of the Woodlands Close properties, as the road is not designed for construction traffic as it is too narrow. Woodland</p>	<p>It is understood that the landowner of the land to the south of Darby House has agreements in place with the housebuilder to the north in respect of access and servicing arrangements.</p> <p>Policy DES11 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed</p>	<p>No change</p>

<p>Close residents would definitely be disrupted and incredibly inconvenienced, for example it would put an end to our children being able to scooter/ cycle safety in the cul-de-sac. if the development ever went ahead, the traffic levels from the proposed addition fo 20 house, would require access through Woodlands Close to Bletchingley Road and this would have a big impact on the current Woodland Close residents, our cul-de-sac was not designed for such traffic volumes.</p>		
<p>The proposed development would also impact on the wildlife residing in the field behind Woodlands Close, as it would be removed entirely and ruin the current natural 'green feel' to this part of Merstham.</p>	<p>Policy NHE2 and NHE3 in the Development Management Plan cover the protection of biodiversity and trees.</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, and an appropriate relationship with the adjoining nature reserve and reflecting the Holmesdale Biodiversity Opportunity Area</li> <li>• Protection and enhancement of woodland boundaries</li> <li>• Design and layout to enhance landscape quality, provide an appropriate transition to surrounding countryside and minimise visibility of the development in long range views</li> <li>• Protection and enhancement of the character and setting of existing listed buildings</li> <li>• Design to respect and enhance the character of Bletchingley Road</li> </ul>	<p>No change</p>

<p>Currently, all the local secondary schools are oversubscribed and it fills me with concern that only consideration has been made in respect of Primary Schools.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure. School provision will be made elsewhere within Reigate &amp; Redhill to provide for demand in line with projection work undertaken.</p>	<p>No change</p>
<p>The main access identified for the land south of Woodlands Close is through Woodlands Close which is inappropriate. Woodlands Close is a private road used by 20 residential properties. This private road consists of decorative "Red Brick" and it is not designed for construction traffic (HGVs, cranes, lorries and delivery vehicles). Moreover, construction traffic will put all residents and our children at risk of collision and accidents in addition to causing noise, dust and air pollution throughout the construction period. We suggest removing the proposed access route to ERM4 land through Woodlands Close in the DMP in order to ensure health, safety and wellbeing of our residents during construction of the development - The DMP MUST identify a temporary construction route and PROTECT Woodlands Close from any kind of construction traffic including</p>	<p>Policy DES11 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed. This should include the elements mentioned in this representation.</p>	<p>No change</p>

contractor's pedestrian access.		
<p>increased traffic congestion on Bletchingley Road in both directions. it seems that there is recognition that the ERM4 &amp; 5 developments with over 200 houses will cause further congestion at School Hill. However, it is my concern that Bletchingley Road as a whole is unsuited to the increased traffic these new homes would bring. Bletchingley Road is traffic calmed to the west, making it effectively a single track road, it is also a main bus route. To the east, Bletchingley Road becomes Merstham Road which is often flooded during at Pendell Road. Both sites have primary access onto Bletchingley Road. As a resident of Woodlands Close it will be much harder to get anywhere during peak hours as a result of the increased load.</p>	<p>The site allocation requires • Improvement and extension of pedestrian and cycle facilities, including new footways on Bletchingley Road and significant upgrades of the existing bridleway through the site (BW119)</p> <p>Proposed policy NHE2 protects nature reserves.</p> <p>The adopted Core Strategy identified Broad Areas of Search including East of Redhill. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release when options are considered as a whole borough wide.</p> <p>The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites.</p> <p>Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p>	No change

<p>Also objection - strain on education services. I can see from the documents that consideration has been given to extended primary school places however the only non-faith secondary school in the area (Warwick) is already over-subscribed, with some children travelling as far as Coulsdon for place.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
<p>Objection due to impact on access to local nature areas. This area comprises the area dissected by Bridlepath 118 which leads to Spynes Mere nature reserve and the recreational area of Mercers Lake. Bridlepath BW118 is a lovely wooded route that enjoys frequent daily use with dog-walkers, runners, cyclists and walkers throughout the year. It is one of the most used pathways in East Merstham as it is the only way to get to any large nature area in Merstham. Bridlepath BW118 joins Bridlepath BW119 which is very heavily used by cyclists as it terminates onto the Surrey Cycleway. The north end of BW119 has minimal traffic as it terminates onto a stretch of Bletchingley Road with no pavement. It is also used at high speed by cyclists directly diverted from the Surrey cycle way. This is why BW108 is so well used by the entire community of East Merstham.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Bletchingley Road and significant upgrades of the existing bridleway through the site (BW119)</li> </ul>	<p>No change</p>

<p>Objection due to impact on character and quality fo local nature areas: the impact of any development would irreversibly damage the natural feel and wildlife living in this area. The current greenbelt to the east of BW118 is a beautifully kept, wide expanse of grass and thickets that not only adds to the natural feel of the area but is also provides habitat for animals living in and around the Spynes Mere Reserve and West Mercers Lake area.</p>	<p>Policy NHE2 and NHE3 in the Development Management Plan cover the protection of biodiversity (including sites of nature conservation like Spynes Mere nature reserve and trees.</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, and an appropriate relationship with the adjoining nature reserve and reflecting the Holmesdale Biodiversity Opportunity Area</li> <li>• Protection and enhancement of woodland boundaries</li> <li>• Design and layout to enhance landscape quality, provide an appropriate transition to surrounding countryside and minimise visibility of the development in long range views</li> <li>• Protection and enhancement of the character and setting of existing listed buildings</li> <li>• Design to respect and enhance the character of Bletchingley Road</li> </ul>	<p>No change</p>
<p>the west side of the proposed ERM4 has no available access. The only way to access this area would be via the Bridlepath BW118 (which would be catastrophic) or via Woodlands Close. The roads in Woodlands Close are unadopted and are owned by the residents of Woodlands Close. Our children regularly play outside in the safety of our cul-de-sac on their bikes and scooters, the residents would not allow sustained access to the planned site and would strenuously object to any plan to provide sustained access via</p>	<p>It is understood that the landowner of the land to the south of Darby House has agreements in place with the housebuilder to the north in respect of access and servicing arrangements.</p> <p>Policy DES11 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed</p>	<p>No change</p>

Woodlands Close.		
<p>Whilst I recognise the need to plan for additional housing needs, Merstham seems a poor place to locate large developments. I understand that my objections may not prevent anything actually happening in Merstham, after all no-one wants their 'own backyard' developed. In the event that these potential sites are needed, ERM5 could accommodate some additional housing as this is mostly unused and unseen GB bordering onto a major motorway. The frequency of public access is far reduced and any modest developments here would be largely unnoticed. The footpath/ bridleway at the centre of ERM4 is the gateway for East Merstham to a popular and well-used network of paths and the surrounding nature reserves and should not be developed further unless as a last resort. I don't feel that there is sufficient infrastructure to support either development, and that East Merstham is ill equipped to deal with an additional 200 houses. From the roads, to the schools there isn't room to accommodate such a large development site in East Merstham.</p>	<p>National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. However, Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p> <p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure. School provision will be made elsewhere within Reigate &amp; Redhill to provide for demand in line with projection work undertaken.</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities, including new footways on Bletchingley Road and significant upgrades of the existing bridleway through the site (BW119)</li> </ul>	No change



<p>As a resident of Woodlands Close which is surrounded by ERM4 and ERM5, I'd like to understand more clearly under what circumstances the 'potential reserve' extension sites would become available for development. Part of the potential site of ERM4 suggests access through Woodlands Close, I am interested to understand how this access would be secured over our communal road. I am very concerned that any development such as that described in ERM4 would have a negative effect on our quality of life during any construction (which is likely to span years) and spoil our enjoyment of the local open spaces and surround of Spynes Mere and Mercers Lake for years to come.</p>	<p>Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.</p> <p>It is understood that the landowner of the land to the south of Darby House has agreements in place with the housebuilder to the north in respect of access and servicing arrangements.</p> <p>Policy DES10 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed</p>	<p>No change</p>
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<p>TDC would raise concerns on the impact of traffic in this location which is likely to put additional pressures on the surrounding rural road network and a better understanding of required mitigation would be useful.</p> <p>It is not apparent at this stage how the effects of surface water run-off from the new development would be managed. Given the proximity of the Nutfield Marshes and wetland areas, if not properly mitigated, development in this location would exacerbate the current flooding issues (Flood Zone 2). TDC would welcome a better understanding and engagement on any mitigation measures, should RBBC progress this urban extension into a preferred approach.</p> <p>This site is also adjacent to the Surrey Hills AONB which extends into TDC and any development in this location would need to be suitably designed to ensure no negative impact on the setting of the AONB.</p>	<p>National and local policy requires that sites over 1 ha demonstrate how they will not impact on flooding elsewhere and mitigate any potential impacts, both for the site itself and the surrounding area. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Measures to manage and reduce surface water run-off including a comprehensive system of SUDs</li> </ul> <p>Policy CCF2 also states that proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding.</p> <p>Surrey County Council's 2017 Strategic Highways Assessment modelled and considered the potential cumulative impact of all planned development to 2031. Although its base-date is 2009, the highways network has been audited and updated to reflect the position at 2014.</p> <p>As it does not take into account potential for modal shift or improvements to sustainable transport modes (rail, bus, walking and cycling), nor any other mitigation, it represents a worse-case scenario. It is a strategic highway model, and is not able to consider the precise composition of a proposed development, its modal split, detailed access arrangements and any highways mitigation proposed to support it. This is more appropriately done at the planning application stage, through a developer's Transport Assessment, which includes more detailed modelling.</p> <p>The transport assessment indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and</p>	<p>No change</p>
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	<p>how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</li> </ul> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough’s Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p> <p>The site allocation requires: Design and layout to enhance landscape quality, particularly in proximity to the AONB and minimise visibility of the development in long range views</p>	
<p>The main road access from Merstham to A23 is via School Hill and Battlebridge Lane. In the morning peak hours there is always a long traffic queue both at School Hill and Battlebridge Lane. Average waiting time to get on to A23 from Merstham is 15 – 20 minutes. We suggest an appropriate traffic improvement plan should be implemented at A23/School Hill Junction, so that the existing traffic (not</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the</li> </ul>	<p>No change</p>

<p>only the additional traffic for the proposed development) can access A23 easily in a reduced time.</p> <p>The Council MUST provide a plan for improved road access at A23/School Hill Junction for existing residents of Merstham within this DMP. The Council indicated an optional contribution from developers to contribute towards traffic improvement, however, we suggest the Council to produce a traffic improvement plan immediately within this DMP and implement it for the benefit of existing residents of Merstham.</p>	<p>impact of additional traffic on safety and efficiency of this junction.</p> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p>	
<p>General public access to the proposed open space within ERM4 land will be limited, so the SC5 objective cannot be achieved due to the location of the land behind Woodlands Close. There is already a recreation area and playground located near to Merstham train station</p>	<p>SC5 is an objective which is delivered by policies OSR1, OSR2 and OSR3. These will ensure that important Urban Open Space is protected via a designation, that adequate open space is provided in new developments and covers the provision of outdoor sport and recreation facilities. It is felt that a children play area will accommodate children at the other end of Merstham.</p>	No change
<p>The land behind Woodlands Close is the transition between urban area and the county park which should remain open as part of the original green belt. The proposed development of ERM4 will also affect the biodiversity of the area.</p>	<p>National policy and the policies proposed in the DMP requires development to make best use of land whilst also providing for important elements such as open space, increases to biodiversity where possible, protection for trees/hedges etc. Policies NHE2 and NHE3 in the DMP cover trees and biodiversity.</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, and an appropriate</li> </ul>	No change

	<p>relationship with the adjoining nature reserve and reflecting the Holmesdale Biodiversity Opportunity Area</p> <ul style="list-style-type: none"> <li>• Protection and enhancement of woodland boundaries</li> <li>• Design and layout to enhance landscape quality, provide an appropriate transition to surrounding countryside and minimise visibility of the development in long range views</li> </ul>	
<p>Sewer Flooding/Leakage: The proposed land for ERM4 behind Woodlands Close is sloped down towards the floodplain. The sewer network for the proposed properties cannot be connected to the existing sewer main at Bletchingley Road by gravity. The head drop is approximately 3-4m from any manholes at Bletchingley Road which means pumped mains will be required for the development. If any new rising main is proposed through Woodlands Close then it will affect our residents temporarily during construction and increase the risk of sewer flooding in front of our properties permanently.</p>	<p>The landowner has confirmed that services have been provided which could service this site. Further details would be required as part of a planning application</p>	No change
<p>ERM4 does not comply with DMP Objective SC3. does not comply with multiple policies in the document so should be removed from the plan</p>	<p>SC3 is an objective which is delivered by policies DES10, DES11 and DES12.</p>	No change
<p>Poor infrastructure: roads too narrow already and it is difficult to exit the area with high congestion</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p>	No change

	<ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</li> </ul> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough’s Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p>	
<p>Worried about noise pollution and dust due to building works</p>	<p>Policy DES11 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed. This should include how noise pollution and dust will be managed.</p>	<p>No change</p>

ERM5

<p>Worried about noise pollution and dust due to building works</p>	<p>Policy DES11 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed. This should include how noise pollution and dust will be managed.</p>	<p>No change</p>
<p>The Sustainability appraisal &amp; the strategic environment assessment reports I believe will highlight some major issues. Your proposal to include New high quality public open space, including appropriate play facilities, so let be clear on this, playing facilities right next door to a busy motorway ( M23) which by the way accommodates many thousands of vehicles per day, suggested pollution level to be approx 40mg/m3 this is really care in the community gone mad. The A23 High street meeting school hill already has an Air quality management order for the pollutant nitrogen dioxide, so the councils plan to increase this level I find shocking.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Appropriate buffer zone to the adjoining motorway and mitigation measures to protect future residents from noise pollution/air quality issues</li> <li>• Protection and enhancement of woodland, particularly on boundaries</li> <li>• Protect existing residential amenity</li> </ul> <p>Proposed Policy DES10 requires the following which would have to be adhered to. If a scheme could not mitigate against unacceptable impact then it would not be permitted. This would have to be demonstrated at a planning application stage.</p> <p>2) Development for new housing or other sensitive development will not normally be permitted where existing fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution are unacceptable and there is no reasonable prospect that these can be mitigated against.</p> <p>3) Noise sensitive uses should be located away from existing sources of noise. If no other reasonable alternative sites exist, development will only be permitted if the noise can be</p>	<p>No change</p>

	<p>satisfactorily mitigated to acceptable levels.</p> <p>5) Measures to reduce the amount of air pollution in the area will be encouraged. Within areas of poor air quality (as defined by the presence of Air Quality Management Areas) development must be designed to minimise the occupants' or users' exposure to air pollution, both internally and externally.</p>	
<p>As this site is owned by a developer I guess it is already lost. So just need to make sure we have a decent development with adequate parking.</p>	<p>The site would only be released for development should the Council no longer be able to demonstrate a 5 year housing supply.</p> <p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No change</p>
<p>Loss of views</p>	<p>The planning portal notes "A material consideration is a matter that should be taken into account in deciding a planning application or on an appeal against a planning decision. However, issues such as loss of view, or negative effect on the value of properties are not material considerations."</p> <p><a href="http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf">http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf</a></p>	<p>No change</p>
<p>Loss of agricultural land</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the</p>	<p>No change</p>



DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.

However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.

The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 & 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.

<p>lot of extra pressure on the local schools and doctors surgery, there is already a short fall in school places in the area and still no guarantee of another secondary school being built, and this is also with a new primary school having recently been constructed, the doctors surgery is full to bursting and appointments are a premium.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
<p>TDC would raise concerns on the impact of traffic in this location which is likely to put additional pressures on the surrounding rural road network and a better understanding of required mitigation would be useful.</p>	<p>Surrey County Council's 2017 Strategic Highways Assessment modelled and considered the potential cumulative impact of all planned development to 2031. Although its base-date is 2009, the highways network has been audited and updated to reflect the position at 2014. As it does not take into account potential for modal shift or improvements to sustainable transport modes (rail, bus, walking and cycling), nor any other mitigation, it represents a worse-case scenario. It is a strategic highway model, and is not able to consider the precise composition of a proposed development, its modal split, detailed access arrangements and any highways mitigation proposed to support it. This is more appropriately done at the planning application stage, through a developer's Transport Assessment, which includes more detailed modelling.</p> <p>The transport assessment indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to</li> </ul>	<p>No change</p>

	<p>carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</p> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p> <p>Site allocation requires: Design and layout to enhance landscape quality, particularly in proximity to the AONB and minimise visibility of the development in long range views</p>	
<p>Indicative plans would suggest development on the site would be separated from the Tandridge border by an area of green space.</p> <p>This site is also adjacent to the Surrey Hills AONB which extends into TDC and any development in this location would need to be suitably designed to ensure no negative impact on the setting of the AONB.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside</li> <li>• Protect existing residential amenity</li> <li>• Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new green corridor and public open space in the eastern part of the site</li> <li>• Protection and enhancement of woodland, particularly on boundaries</li> <li>• Design and layout to enhance landscape quality, particularly in proximity to the AONB and minimise visibility of the development in long range views</li> <li>• Appropriate buffer zone to the adjoining motorway and mitigation measures to protect future residents from noise</li> </ul>	<p>No change</p>

	pollution/air quality issues	
The new development at Portland drive is a great future for merstham as a village dont ruin it by over development.	National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. The Core Strategy identified Broad Areas of Search including Merstham. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release when options are considered as a whole borough wide, and rather than being chosen because developers want to develop these sites. The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.	No change

<p>Oakley farm is green belt, it protects this side of merstham from the m23, it makes merstham still a village, also a great concern in this part of merstham is the ground water drainage, particularly in the east bordering the oakley centre and oakley farm. This year our garage and drive flooded on numerous occasions for the first time. The green area between bolsover grove and radstock way in the bottom west corner is always waterlogged. The access to merstham via battlebridge lane or school hill is becoming increasingly congested, and access from the bletchingley road side is liable to severe flooding in the winter months.</p>	<p>National and local policy requires that sites over 1 ha demonstrate how they will not impact on flooding elsewhere and mitigate any potential impacts, both for the site itself and the surrounding area. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Measures to manage and reduce surface water run-off including a comprehensive system of SUDs</li> </ul> <p>Policy CCF2 also states that proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding.</p>	<p>No change</p>
<p>drainage, water run off and flooding if the fields are built on</p>	<p>National and local policy requires that sites over 1 ha demonstrate how they will not impact on flooding elsewhere and mitigate any potential impacts, both for the site itself and the surrounding area. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Measures to manage and reduce surface water run-off including a comprehensive system of SUDs</li> </ul> <p>Policy CCF2 also states that proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding.</p>	<p>No change</p>

<p>traffic burden near the primary school</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</li> </ul> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p>	<p>No change</p>
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<p>To allow development on the Oakley Farm site would allow development up to the boundary with Tandridge District Council, which in Tandridge's search for land could encourage them to build up to Reigate's boundary which would least affect their residents but result in a complete destruction of the countryside here. It would appear also that further development is being considered beyond the Darby house development once again on Green Belt land which many local people enjoy when walking their dogs or walking across to Mercers Lake. Construction for the motorway and the M23/M25 interchange left Merstham with considerable noise and air pollution, decimated wildlife habitats and cut a swathe through beautiful countryside. The Green belt at least provided a natural barrier between the motorway and the estate and gradually over recent years some wildlife habitats have returned and ensured that the people of Merstham maintained a valued part of the environment.</p> <p>When I questioned a representative of the Planning Department as to why Merstham's Green Belt has been earmarked for possible development and not that in Reigate i was told that most of Reigate was an area of outstanding natural</p>	<p>National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The addopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. Urban extension sites are proposed in Horley, east Redhill, South Reigate and Merstham as these areas have the least constraints and are the most sustainable.</p> <p>Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the use of</p>	<p>No change</p>
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beauty but that sites in Reigate were being considered. When questioned as to where in Reigate he said Woodhatch and South Park. Strange that. Both, like Merstham, are areas of Council accommodation. Because people live in poorer areas of the borough are they less entitled to live in a decent environment? We too value our countryside and the environment in which we live.

recycling of derelict and other urban land. The site has a relatively low overall priority for protection – Rank 5 (5 lowest, 1 highest). In particular, the land parcel is considered to have strong boundaries, and development of the parcel would also only have a limited impact on settlement separation.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.

Tandridge are currently working on their Local Plan and they have identified that they are looking to accommodate their housing need through a stand alone settlement. They consulted on their proposed options in Autumn 2017, none of which included this area. As per the above, they would have to justify that any development proposal was sustainable and did not compromise the purposes of the Green Belt, as set out above.



<p>There has never been a direct bus link through the estate to Merstham train station. Parking for the station around residential roads has been a huge problem. No need to mention the problems with the trains. I doubt that they could cope with the passengers. Schools are under pressure and will be even more so in the future even though a new school has been built at Battlebridge and a new secondary school is planned for the area. Since the motorway was built properties and land around Bolsover Grove/ Radstock Way have suffered from excess water. We were told at the time that drainage systems would be put in place but gardens and land nearby become saturated after rain and any repairs to road surfaces are just washed away. Leaving Merstham in the morning is a nightmare, whichever exist you use, be it School Hill or Battlebridge Lane. The only other exist consists of narrow country lanes. Even with improvements to the junction of School Hill/ A23 the problem would not be resolved and would probably cause even more problems on A23. Adding more traffic would make matters even worse. I question why this land is being considered when there are other sites that could be built on.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</li> </ul> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p> <p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p> <p>National and local policy requires that sites over 1 ha demonstrate how they will not impact on flooding elsewhere</p>	<p>No change</p>
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Why allow buildings and brownfield sites in the borough to remain empty for years when people need homes?

Why Shaftesbury House, School Hill, has been allowed to stand empty for years. There must be many such buildings crying out for updating and occupation and their development would ensure that the GB could be protected. Over the years protection for the GB has been fought for by many local residents. More than one attempt has been made by developers to purchase Oakley Farm.

and mitigate any potential impacts, both for the site itself and the surrounding area. The site allocation requires:

- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs

Policy CCF2 also states that proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding.

The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land. A planning application is currently being assessed for Shaftesbury House.

However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.

<p>Over the past few years Reigate and Banstead Council have already allowed the urban spread of Redhill to Merstham with most recently the Watercolour Development. Small pieces of land within Merstham have been developed to their maximum for example the old Purbeck Close area and the site behind Portland house. A small development sneaked on park land within Dundrey Crescent and most recently the Derby House Site. The centre of Merstham is currently undergoing redevelopment bringing even more new homes in addition to the existing housing stock. The Epiphany Church Site, Merstham Library, the Limes and the Oakley Youth Centre are all earmarked for development which shows an already extensive development of Merstham in a very short period of time.</p>	<p>National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. The Core Strategy identified Broad Areas of Search including Merstham. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release when options are considered as a whole borough wide, and rather than being chosen because developers want to develop these sites. The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p> <p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
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<p>We have many concerns including the loss of Green Belt, woodland and open agricultural land, some of which lies within an Area of Outstanding Natural Beauty. This land and associated trees act as a much needed buffer between urban housing and the motorways. It is an area rich in wildlife and plant habitats and goes some way to providing necessary relief from air and noise pollution.</p> <p>There would also be an inevitable increase in traffic movements on what is already considered to be busy and potentially dangerous roadways and junctions.</p> <p>We feel there is much confusion on the part of planners. Where is the sense in demolishing the medium/high density housing on the Portland Drive, Merstham site, only to replace it with low density housing and then to plan and seek approval for building medium density housing and commercial property on irreplaceable Green Belt, woodland and open agricultural land?</p> <p>Should planning be granted and building commenced it would set a precedent for Tandridge Council to submit similar planning applications for the land adjacent to the motorways. Where will it end?</p>	<p>National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released.</p> <p>Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land. The site has a relatively low overall priority for protection – Rank 5 (5 lowest,</p>	<p>No change</p>
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	<p>1 highest). In particular, the land parcel is considered to have strong boundaries, and development of the parcel would also only have a limited impact on settlement separation.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p> <p>The Portland Drive redevelopment increased the number of units. Our policies seek to make most efficient use of land balanced whilst ensuring good design which takes account of site constraints.</p> <p>Tandridge are currently working on their Local Plan and they have identified that they are looking to accommodate their housing need through a stand alone settlement. They consulted on their proposed options in Autumn 2017, none of which included this area. As per the above, they would have to justify that any development proposal was sustainable and did not compromise the purposes of the Green Belt, as set out above.</p>	
<p>With regards to the Motorway intersection East of Merstham. I currently live on the East edge of Merstham. The noise from the Motorways is significant. On good days it is a subtle hum and on bad days it roars, depending on the wind direction. We are already subject to this noise pollution and that is with the existing benefit of the mature and well established trees and greenery which the farm</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Appropriate buffer zone to the adjoining motorway and mitigation measures to protect future residents from noise pollution/air quality issues</li> <li>• Protection and enhancement of woodland, particularly on boundaries</li> <li>• Protect existing residential amenity</li> </ul> <p>Proposed Policy DES11 requires the following which would</p>	<p>No change</p>

provides. These trees and their extensive canopies are hundreds of years old, no amount of fencing or planting of new tree borders will provide the same level of protection that these beautiful natural barriers offer us. Development of Oakley farm will destroy this and subject this side of Merstham to further more disruptive noise pollution.

have to be adhered to. If a scheme could not mitigate against unacceptable impact then it would not be permitted. This would have to be demonstrated at a planning application stage.

DES11

1) Development will only be permitted (and subject to compliance with other policies) where it can be demonstrated that (on its own or cumulatively) it will not result in a significant adverse or unacceptable impact on the natural and built environment (including sensitive habitats); amenity; or health and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution. Where there would be potential adverse effects from pollution and adequate mitigation cannot be provided, development will not normally be permitted. This includes pollution from construction and pollutions as a result of the life of the development, and particular attention should be paid to development within Air Quality Management Areas.

2) Development for new housing or other sensitive development will not normally be permitted where existing fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution are unacceptable and there is no reasonable prospect that these can be mitigated against.

3) Noise sensitive uses should be located away from existing sources of noise. If no other reasonable alternative sites exist, development will only be permitted if the noise can be satisfactorily mitigated to acceptable levels.

5) Measures to reduce the amount of air pollution in the area will be encouraged. Within areas of poor air quality (as defined by the presence of Air Quality Management Areas)

	<p>development must be designed to minimise the occupants' or users' exposure to air pollution, both internally and externally.</p>	
<p>ERM5: This development was refused at least twice in 1988 as being too much development in that area. We have the M25 to the north of us and the M23 to the east, so if the existing trees and forestry is disturbed it will effect the oxygen levels and fumes from both motorways, also dust and dirt particles</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Appropriate buffer zone to the adjoining motorway and mitigation measures to protect future residents from noise pollution/air quality issues</li> <li>• Protection and enhancement of woodland, particularly on boundaries</li> <li>• Protect existing residential amenity</li> </ul> <p>Proposed Policy DES11 requires the following which would have to be adhered to. If a scheme could not mitigate against unacceptable impact then it would not be permitted. This would have to be demonstrated at a planning application stage.</p> <p><u>DES11</u></p> <p>1) Development will only be permitted (and subject to compliance with other policies) where it can be demonstrated that (on its own or cumulatively) it will not result in a significant adverse or unacceptable impact on the natural and built environment (including sensitive habitats); amenity; or health and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution. Where there would be potential adverse effects from pollution and adequate mitigation cannot be provided, development will not normally be permitted. This includes pollution from construction and pollutions as a result of the life of the development, and particular attention should be paid to development within Air Quality Management Areas.</p>	<p>No change</p>

	<p>2) Development for new housing or other sensitive development will not normally be permitted where existing fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution are unacceptable and there is no reasonable prospect that these can be mitigated against.</p> <p>3) Noise sensitive uses should be located away from existing sources of noise. If no other reasonable alternative sites exist, development will only be permitted if the noise can be satisfactorily mitigated to acceptable levels.</p> <p>5) Measures to reduce the amount of air pollution in the area will be encouraged. Within areas of poor air quality (as defined by the presence of Air Quality Management Areas) development must be designed to minimise the occupants' or users' exposure to air pollution, both internally and externally.</p>	
<p>Besides the wild life, deer, owls and bats we see in the trees and fields. All the roads are basically B roads and not designed for increased traffic both commercial and private vehicles also the Bletchingley Road is a rat run to the M25 and the Hawthorn School.</p>	<p>Policy NHE2 and NHE3 in the Development Management Plan cover the protection of biodiversity and trees.</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside</li> <li>• Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new green corridor and public open space in the eastern part of the site</li> <li>• Protection and enhancement of woodland, particularly on boundaries</li> <li>• Design and layout to enhance landscape quality, particularly in proximity to the AONB and minimise visibility of the development in long range views</li> <li>• Appropriate buffer zone to the adjoining motorway and mitigation measures to protect future residents from noise</li> </ul>	<p>No change</p>



pollution/air quality issue

An ecology survey would be required for this site and any protected species found on the site would have to be accommodated appropriately in line with statutory procedures associated with these to ensure they are appropriately protected

A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:

- Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.

This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.

<p>Redevelopment would be right up to the existing boundary line, leaving us in Bolsover Grove with no outlook whatsoever. If there were a strip of GB between the proposed development and Bolsover Area it might be more acceptable. Given that Oakley House and land is being developed, we feel that should be enough for this area, otherwise we could be hemmed in on three sides.</p>	<p>National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. The Core Strategy identified Broad Areas of Search including Merstham. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release when options are considered as a whole borough wide, and rather than being chosen because developers want to develop these sites.</p> <p>The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside</li> <li>• Protect existing residential amenity</li> <li>• Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new green corridor and public open space in the eastern part of the site</li> </ul>	<p>No change</p>
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	<ul style="list-style-type: none"> <li>• Protection and enhancement of woodland, particularly on boundaries</li> <li>• Design and layout to enhance landscape quality, particularly in proximity to the AONB and minimise visibility of the development in long range views</li> <li>• Appropriate buffer zone to the adjoining motorway and mitigation measures to protect future residents from noise pollution/air quality issues</li> </ul>	
<p>Our current situation is that trying to leave Merstham in the morning to go to work is near on impossible. If you dare attempt this after 8am you will find yourself in stationary traffic in Battlebridge Lane or School Hill for at least 15mins. Once you pass these points and make it on to the A23 or Frenches Road you once again become gridlocked making the journey to work a misery to endure just leaving our 'village'. I note that you are aware of this as you identify in you plans an improvement at A23/School Hill is 'likely' to be required. It is needed now with the current population, I cannot see that even traffic lights at the top of school hill could make the current situation any easier let alone be sufficient with a whole new community to cater for. It will just add to the current congestion on the A23 and make leaving Merstham in the morning an impossible task.</p>	<p>The site allocation requires: • Safe highway access onto Bletchingley Road, taking a co-ordinated approach with other sites in the vicinity</p> <p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</li> </ul> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on</p>	<p>No change</p>

	improving the local road network which they manage.	
<p>I would also like to challenge your responsibility as our local council. The Green Belt is to protect us from urban sprawl and is our only remaining protection we have left. You have allowed the sprawl from Redhill and this is the last bit of land you are responsible for before the boundary of Tandridge. Building on this leaves us wide open to further sprawling of Merstham on the other side of the Motorway, something that you will have no control over as it would be at the mercy of Tandridge District Council. I don't doubt they would see this as perfect opportunity to address their development needs and would have little impact on their communities and therefore it would meet little to no opposition. You can stop this by preserving our Green Belt and preventing development of Merstham over their boundary. I ask you please to really consider this, this piece of land has such a significant value in preventing extensive future development and you control it. Please consider your responsibility and the consequence of destroying this Green Belt in view of its borough boundary significance.</p>	<p>National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released.</p> <p>Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to</p>	No change

	<p>assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land. The site has a relatively low overall priority for protection – Rank 5 (5 lowest, 1 highest). In particular, the land parcel is considered to have strong boundaries, and development of the parcel would also only have a limited impact on settlement separation.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p> <p>Tandridge are currently working on their Local Plan and they have identified that they are looking to accommodate their housing need through a stand alone settlement. They consulted on their proposed options in Autumn 2017, none of which included this area. As per the above, they would have to justify that any development proposal was sustainable and did not compromise the purposes of the Green Belt, as set out above.</p>	
<p>In July 2014 the Core Strategy was publicised as showing the council as committed to the continued protection of the green belt. What a difference two years makes. It is now apparent that this commitment was false and the development of the Green Belt land east of Merstham is very much on the agenda so much so that the Development Management Plan Regulation 18 fact Sheet even goes as far as to show a suggestion of how building on this land will</p>	<p>National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p>	<p>No change</p>

look.

It is very clear that Reigate and Banstead have this land very much within their sights now and yet in 2014 in a Call for Sites report (Ref S2011M14) in relation to suitability of the land for development it was said:

'The site is designated Green Belt and a small part of the site is a designated AONB an area of outstanding natural beauty. There are also a small number of listed buildings on the site. The site is located on the urban edge of Merstham and is close to the M25/M23 interchange and liable to noise pollution'

It was summarised:

'The site is not deliverable or developable. However, the site may be considered potentially suitable for development subject to further analysis and a Green Belt review' Has this happened? is this something else that has been hidden from those who live and enjoy this beautiful landscape as it currently stands?

However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.

Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.

<p>Finally I would like to challenge your example of how the 'Oakley Farm Urban extension site' could be laid out. I feel it represents a total disregard to the residents who currently border the open green land of the farm. Not only are you proposing to destroy our landscape but show an intention to position the most densely developed part of the plan adjacent to existing properties. To address 'green space', nothing for those who enjoy it at present, a small 'woodland strip' on the furthest boarder right next to the M23. Who benefits from this? Not the existing residents, you are encapsulating them in development. Families who have worked hard to move to this area to enjoy the green space and beautiful views will find themselves encapsulated by buildings. I moved here so that my children could enjoy living on the edge of the countryside as I had done as a child. You are proposing to take this away from me and many other families in Merstham. The consequences of this development would be devastating.</p>	<p>This was an indicative masterplan of what the site could look like for illustrative purposes only, it is not intended to be the final design. This would need to be informed by detailed consideration of the site and would have to be submitted through a planning application. The site allocation requires any design to accord with the following:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside</li> <li>• Protect existing residential amenity</li> <li>• Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new green corridor and public open space in the eastern part of the site</li> <li>• Protection and enhancement of woodland, particularly on boundaries</li> <li>• Design and layout to enhance landscape quality, particularly in proximity to the AONB and minimise visibility of the development in long range views</li> <li>• Appropriate buffer zone to the adjoining motorway and mitigation measures to protect future residents from noise pollution/air quality issues</li> </ul>	<p>No change</p>
<p>I do not accept that over the whole borough you cannot find alternative sites for these 95 homes. I think you see this as an easy option to solve your housing challenges with no real consideration to the negative</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p>	<p>No change</p>

impact it will have on those living within Merstham. Tell me how you can have the audacity to suggest examples of how our Green Belt land could be developed when just a stones through away there are sites such a Shaftsbury House in School Hill, derelict for several years, vandalised and unoccupied and ignored. If you tried hard enough you would find plenty of these small sites. I'm sure it is much easier for you to continue to add on to communities that are already struggling, taking away the small pleasures the communities have. Shame on you and your destructive propositions. Once you have destroyed our small piece of country side we can never have it back.

The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land. Shaftsbury House is the subject of a current planning application - Ref: 17/00444/F

However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.

The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 & 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.



<p>A23/School Hill: The junctions between A23 and Blechingley road is not designed to accommodate the current traffic volume. In the morning peak hour, it takes approximately 15 - 25 minutes to just to get on to A23. The traffic is even worse through New Battlebridge lane. On Average Merstham residents spend up to 30 minutes just to get on A23. The Development Management Plan must give an appropriately designed plan for traffic improvement at A23/Blechingley Rd Junction. The plan must also give directions on how it should be implemented; not just stating the developers may contribute to road improvements.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</li> </ul> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p>	<p>No change</p>
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<p>Each homes will come with at least two cars per household, that's a lot of extra traffic merging onto the already busy Bletchingley Road</p>	<p>The site allocation requires: • Safe highway access onto Bletchingley Road, taking a co-ordinated approach with other sites in the vicinity</p> <p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</li> </ul> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p>	<p>No change</p>
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<p>Significant upgrades of the existing footpath on Blenchingly Road &amp; Upgrading of off-carriageway pedestrian/cycle routes to nearby local centres and Merstham station, why does it take a new development to get this works carried out? The council should be doing this anyway for the existing residents of Merstham as many roads &amp; footpaths are in need of urgent repair for its 8,000 residents.</p>	<p>Surrey County Council manage the existing road network. Their various strategies can be found here: <a href="https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies">https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies</a></p>	<p>No change</p>
<p>Development of this site would have a direct access issue into &amp; exiting Merstham via School Hill &amp; Battlebridge Lane. To build up to 148 units could see an increase of traffic of 300 cars all trying to use the already very congested routes in &amp; out of the village.</p>	<p>The site allocation requires: • Safe highway access onto Bletchingley Road, taking a co-ordinated approach with other sites in the vicinity</p> <p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</li> </ul> <p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough’s Infrastructure Delivery Plan</p>	<p>No change</p>

	(IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.	
Each of these homes will come with at least two cars per household, if there is insufficient parking this will have an effect on the surrounding roads with an overspill of cars needing to park	Noted. Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .	No change
Redevelopment of the Portland Drive area with new flats and houses having already been completed in Fieldoaks Way and Purbeck Close as well as on the site of the Old Iron Horse pub with more building to take place when the flats and shops are demolished, this is still more strain on local resources. Darby House, (also with a proposal to build behind) and the Oakley Centre are sufficient for the immediate area and the currently fragile infrastructure that we have. The area is already surrounded by two motorways, a landfill site, the Water Colours estate and Park 25.	<p>National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search</p>	No change

	<p>for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p> <p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	
<p>Concern about possible impact on the highway system as the A25 is already heavily congested at peak periods.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the A23/School Hill junction. At the planning application stage developers would be required to carry out a feasibility study, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety and efficiency of this junction.</li> </ul>	<p>No change</p>

	<p>This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). This feeds into the work that Surrey County Council do on improving the local road network which they manage.</p>	
<p>Concern about whether sufficient account has been taken of other infrastructure and service requirements.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
<p>It is essential that there is a clear sequence of programmed development and infrastructure, with background work on the early sites sufficiently advanced to be brought forward quickly if required so that other Green Belt sites are not lost.</p>	<p>Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.</p>	<p>No change</p>
<p>This would increase noise and light pollution for surrounding properties</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Appropriate buffer zone to the adjoining motorway and mitigation measures to protect future residents from noise pollution/air quality issues</li> <li>• Protect existing residential amenity</li> </ul> <p>Proposed Policy DES11 requires the following which would have to be adhered to. If a scheme could not mitigate against unacceptable impact then it would not be permitted. This would have to be demonstrated at a planning application stage.</p>	<p>No change</p>

DES11

1) Development will only be permitted (and subject to compliance with other policies) where it can be demonstrated that (on its own or cumulatively) it will not result in a significant adverse or unacceptable impact on the natural and built environment (including sensitive habitats); amenity; or health and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution. Where there would be potential adverse effects from pollution and adequate mitigation cannot be provided, development will not normally be permitted. This includes pollution from construction and pollutions as a result of the life of the development, and particular attention should be paid to development within Air Quality Management Areas.

2) Development for new housing or other sensitive development will not normally be permitted where existing fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution are unacceptable and there is no reasonable prospect that these can be mitigated against.

3) Noise sensitive uses should be located away from existing sources of noise. If no other reasonable alternative sites exist, development will only be permitted if the noise can be satisfactorily mitigated to acceptable levels.

5) Measures to reduce the amount of air pollution in the area will be encouraged. Within areas of poor air quality (as defined by the presence of Air Quality Management Areas) development must be designed to minimise the occupants' or users' exposure to air pollution, both internally and externally.

<p>To have a building site on this Green Belt of outstanding beauty only 3 foot away from my windows, would be suffocating. The dust, noise and awful pollution, would be intolerable. Because of this, I would not be able to open windows in the summer and literally, I would go crazy.</p>	<p>Policy DES11 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed.</p> <p>Proposed policy DES11 states:</p> <p>1) Development will only be permitted (and subject to compliance with other policies) where it can be demonstrated that (on its own or cumulatively) it will not result in a significant adverse or unacceptable impact on the natural and built environment (including sensitive habitats); amenity; or health and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution. Where there would be potential adverse effects from pollution and adequate mitigation cannot be provided, development will not normally be permitted. <u>This includes pollution from construction</u> and pollutions as a result of the life of the development, and particular attention should be paid to development within Air Quality Management Areas.</p>	<p>No change</p>
<p>Bletchingley Road is a dangerous road with a Nursing Home next door. It could never be considered safe to support a large volume of vehicles going in or out of an entrance on this blind corner.</p>	<p>The site allocation requires: • Safe highway access onto Bletchingley Road, taking a co-ordinated approach with other sites in the vicinity</p>	<p>No change</p>



<p>This will devalue existing homes in the area so much, their owners will be unable to sell them.</p>	<p>The planning portal notes "A material consideration is a matter that should be taken into account in deciding a planning application or on an appeal against a planning decision. However, issues such as loss of view, or negative effect on the value of properties are not material considerations."  <a href="http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf">http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf</a></p>	<p>No change</p>
<p>Merstham local centre and other local facilities currently accommodate over 8,000 people in the village who support them, we do not need another 450 people to put a strain on these services.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
<p><b>Flooding</b> - The Oakely fields are a significant area for water draining from the hills behind, they become regularly marshy from Autumn-Spring, with these fields being built on the problem will become worse with the threat of flooding onto Bletchingley Road, as already happens in a couple of spots, putting the new properties of Darby House at risk. All the drainage and sewer works have been changed with the construction of the Darby House site, another site will mean an increased requirement for drainage and sewage.</p>	<p>National and local policy requires that sites over 1 ha demonstrate how they will not impact on flooding elsewhere and mitigate any potential impacts, both for the site itself and the surrounding area. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Measures to manage and reduce surface water run-off including a comprehensive system of SUDs</li> </ul> <p>Policy CCF2 also states that proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding.</p>	<p>No change</p>

REI

Shops and houses at the Town Hall site - restricted access and egress onto a very busy road would be dangerous.	This comment has been noted. The site allocation requires Safe vehicular access in and out of the site, and appropriate traffic management on Castlefield Road	No change
This is more appropriate for residential use than retail as it is outside Reigate town centre. The access to the Surrey Choices use (which was used to justify the end of use of Colebrook in Redhill) should be sustained.	This comment has been noted. The site would actually sit within the designated Town Centre boundary, although not within a shopping frontage. The building that Surrey Choice occupy is not part of the site allocation.	No change
RE11 - the Town Hall area is particularly sensitive	This comment has been noted. The site allocation requires High quality design and layout sensitive to the setting of the Grade II listed Town Hall, character/setting of the Conservation Area and Scheduled monument.	No change
concerned - particularly if the scheme impinges upon the Castle Grounds. I cannot determine whether this is the case from your map	This comment has been noted. The site does not sit within the scheduled monument designation or Historic Parks and Gardens designation which covers the Castle Grounds, but is located within a Conservation Area. The scheme is only located on the Town Hall car park.	No change
Concern that development here will obscure views of the listed Town Hall building.	This comment has been noted. The site allocation requires High quality design and layout sensitive to the setting of the Grade II listed Town Hall, character/setting of the Conservation Area and Scheduled monument.	No change
Concern that development here will lead to a loss of parking.	Noted. Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development	No change

	would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .	
The proposed convenience store on the Reigate Town Hall car park will detract from the success of Reigate Town Centre. By providing a convenience store outside the town, the flow of visitors to Reigate and customers from the Town Hall and other large office complexes nearby will inevitably reduce. There is already a new convenience store by Reigate Station so why is this new store necessary (apart from rental income to the Council)? A new convenience offer (whether Waitrose or any other similar company) will undoubtedly have an impact on town centre traders, especially given its proximity to the Council Offices and Reigate College which provide a large percentage of trips to Reigate Town Centre at peak periods.	This comment has been noted. Retail is no longer being proposed on this site	Retail no longer being proposed
This will also lead to highways issues as current pedestrian crossings to the north of the town centre are at capacity and exiting from the Council Car park is difficult even outside peak hours, especially for those travelling east towards Redhill from the Town Hall car park as there are two lanes to cross.	This comment has been noted. Any planning application would have to demonstrate that an appropriate scheme with safe access and egress could be achieved in line with DMP Policy TAP1. The site allocation requires: <ul style="list-style-type: none"> <li>• Safe vehicular access in and out of the site, and appropriate traffic management on Castlefield Road</li> </ul>	Retail no longer being proposed
Should be left as our town hall car park. If we must develop it then it should be for very high quality flats	This comment has been noted. A Transport Assessment was carried out for the sites proposed	No change

<p>which we can let to provide income.</p>	<p>in the DMP, this did not flag this road as a hotspot. However, any planning application would have to demonstrate that an appropriate scheme with safe access and egress could be achieved in line with DMP Policy TAP1. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Safe vehicular access in and out of the site, and appropriate traffic management on Castlefield Road</li> </ul> <p>An option for residential only has been included</p>	
<p>plans for a high rise around the beautiful council offices in central Reigate is horrible so close to the castle park. This would greatly affect the view of the castle from the top of the Priory park hill.</p>	<p>This comment has been noted. The site allocation requires High quality design and layout sensitive to the setting of the Grade II listed Town Hall, character/setting of the Conservation Area and Scheduled monument.</p>	<p>No change</p>
<p><b>Traffic/congestion</b> - on extremely congested roads - extra traffic during construction or after would make for terrible delays for local and other traffic using the A25.</p>	<p>This comment has been noted. A Transport Assessment was carried out for the sites proposed in the DMP, this did not flag this road as a hotspot. However, any planning application would have to demonstrate that an appropriate scheme with safe access and egress could be achieved in line with DMP Policy TAP1. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Safe vehicular access in and out of the site, and appropriate traffic management on Castlefield Road</li> </ul>	<p>No change</p>

REI2

<p>If you choose to redevelop the site that includes the Reigate Library please ensure that the library is included into the new building and not lost.</p>	<p>The site allocation requires the "Retention, replacement or relocation of existing community uses, particularly the library/registry office"</p>	<p>No change</p>
<p>Any proposal that involves the loss of Reigate Library will not be supported by the Guild. The Library is a vital resource for the town centre and much could be done to improve the current offer including more regular open times and community events.</p>	<p>The site allocation requires the "Retention, replacement or relocation of existing community uses, particularly the library/registry office"</p>	<p>No change</p>
<p>parking is critical in Reigate, the Bancroft Road car park is too small, so we must have proper parking. People in Reigate will have one probably two cars.</p>	<p>Noted. Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No change</p>
<p>It is important to safeguard a library in Reigate. This amenity is important to young and old alike. Any new building should incorporate the facility for a library.</p>	<p>The site allocation requires the "Retention, replacement or relocation of existing community uses, particularly the library/registry office"</p>	<p>No change</p>
<p>RE1: The DMP highlights the 0.21ha site, which is partially owned by SCC as a potential allocations for mixed use development site with up to 1000sqm of retail/commercial/leisure uses and approx. 25 homes. The site is identified within the DMP as within the Reigate town centre boundary. The allocation requires active ground frontage to be provided, and a development that respects the character and setting of the adjacent conservation</p>	<p>Noted - we will continue to engage as part of our Duty to Cooperate</p>	<p>No change</p>

<p>area. Surrey County Council would wish therefore to be actively engaged in further discussions regarding the site, and the development opportunities and the consideration of the community uses currently on the site. Given this, the timeframe for delivery of 5-10 years is currently supported by again discussions is welcomed regarding potential timescales.</p>		
<p>We are concerned about viability if 25 dwellings are to finance a replacement library.</p>	<p>The site allocation requires the "Retention, replacement or relocation of existing community uses, particularly the library/registry office". A scheme would only be permitted if the library was retained, replaced or relocated in line with this requirement. Surrey County Council manage the libraries in our borough and own the current library site, it would be for them to decide, in making any decision on this site and the management of the library, if a viable scheme could be achieved. The numbers are considered suitable, based on assessment of the site, constraints etc and considering viability as a broad level. The residential numbers are approximate, so SCC could argue a higher number if a suitable design can be achieved taking into account the site requirements</p>	<p>No change</p>
<p>Register my objection to this site as a business owner on this site with a new lease and no break clause until 2025. It would seem convenient that only recently that Bancroft Road was removed from the Conservation Area that would allow any development to take place on this site We support the local community by employing local residents and support local businesses and</p>	<p>Conservation Areas are not something within the remit of planning policy and the policy team are not influenced by other departments in the Council. This site is now being put forward as an opportunity area which reflects that full availability is unknown but some comprehensive development would be supported. However, the intention is not to lose successful businesses, the intention is to make better use of town centre locations and the site</p>	<p>The site allocation has been updated to state:</p> <ul style="list-style-type: none"> <li>• accommodate existing businesses or</li> </ul>

<p>residents, we have an excellent reputation and this site is ideal for our type of business with parking for customers with disabilities and retail access. There are few of our type of business through the borough, only 2 in fact! Ours and one in Horley. All the business's at Pool House have chosen this site because it suits their type of business and the rent is at an affordable level within Reigate.</p> <p>We looked extensively before locating this address and should we be forced to close for redevelopment we would have no option but to close the business as are no other suitable sites within Reigate and our now established area, having traded within Reigate for the past 15 years.</p> <p>How is the local council supporting businesses within the town centre by developing on a site when they are already permitting so many conversions of office buildings into residential dwellings? You are doing this throughout Reigate, Redhill and beyond, it makes this site completely unnecessary, the access is already poor at most times of the day with traffic queues the entire length of Bancroft Road in morning rush hour and then 3-30 to 6pm every evening. With a residential development this would greatly exaggerate the problem causing a much larger traffic problem than is already present. The council already exceeds the pollution levels daily around the town and cannot solve the problem, this would only make the problem worse.</p> <p>We would use our everything at our disposal to object to this development, as I'm sure all the other 6 business's will too, all of which employ local</p>	<p>allocation has been updated to state:</p> <ul style="list-style-type: none"> <li>• accommodate existing businesses or provide a relocation strategy for existing business occupiers</li> </ul> <p>Other points mentioned would have to be tested through a planning application, including parking, access and traffic which is covered by policy TAP1 and pollution which is covered by policy DES11</p>	<p>provide a relocation strategy for existing business occupiers</p>
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residents totalling approx. 25-30 people.		
This should be used for a two or three floor apartment block with staff parking at the rear.	The site is located within the Town Centre Boundary and it is considered that an active frontage should be retained in this location. The site allocation also requires retention, replacement or relocation of existing community uses, particularly the library/registry office. The site allocation also requires a relocation strategy for existing business/industrial occupiers or where appropriate accommodate existing businesses.	No change
Any work in Bancroft Rd should be exclusively housing (apartments)	The site is located within the Town Centre Boundary and it is considered that an active frontage should be retained in this location. The site allocation also requires retention, replacement or relocation of existing community uses, particularly the library/registry office. The site allocation also requires a relocation strategy for existing business/industrial occupiers or where appropriate accommodate existing businesses	No change
The library is an important part of Reigate and would hate to see it closed.	This comment has been noted. The site allocation requires the "Retention, replacement or relocation of existing community uses, particularly the library/registry office"	No change



REI3		
<p>With the Holmethorpe industrial estate just a few miles away I do not believe the Albert Road North industrial estate is practical or needed.</p>	<p>Comment is noted. The site has now been categorised as an opportunity area now to reflect that the site is in a number of ownerships and as such a comprehensive scheme may not be able to come forward - although we are including it in the plan to encourage this to come forward</p> <p>The opportunity area site allocation seeks to retain as a minimum the same amount of employment floor area as is currently provided but it is recognised that more intensive industrial uses are not appropriate for this residential area. As such, employment space should be for small businesses/start-ups/ incubator space and workshops within the B1 use class (which covers Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.) The intention is that the scheme will be comprehensive redevelopment of the site which will enable more efficient use of land to be achieved. As such, up to 50 new homes could be achieved.</p>	<p>No change</p>

<p>I would support the redevelopment of Albert Rd North Estate but would mainly use this for housing</p>	<p>Comment is noted. The site has now been categorised as an opportunity area now to reflect that the site is in a number of ownerships and as such a comprehensive scheme may not be able to come forward - although we are including it in the plan to encourage this to come forward</p> <p>The opportunity area site allocation seeks to retain as a minimum the same amount of employment floor area as is currently provided but it is recognised that more intensive industrial uses are not appropriate for this residential area. As such, employment space should be for small businesses/start-ups/ incubator space and workshops within the B1 use class (which covers Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.) The intention is that the scheme will be comprehensive redevelopment of the site which will enable more efficient use of land to be achieved. As such, up to 50 new homes could be achieved.</p>	<p>No change</p>
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<p>the plan to remove employment areas well away from residential areas conflicts with reduced traffic and parking targets</p>	<p>Comment is noted. The site has now been categorised as an opportunity area now to reflect that the site is in a number of ownerships and as such a comprehensive scheme may not be able to come forward - although we are including it in the plan to encourage this to come forward</p> <p>The opportunity area site allocation seeks to retain as a minimum the same amount of employment floor area as is currently provided but it is recognised that more intensive industrial uses are not appropriate for this residential area. As such, employment space should be for small businesses/start-ups/ incubator space and workshops within the B1 use class (which covers Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.) The intention is that the scheme will be comprehensive redevelopment of the site which will enable more efficient use of land to be achieved. As such, up to 50 new homes could be achieved.</p>	<p>No change</p>
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<p>This is a difficult one. It is inexpensive employment area that I would be reluctant to use. However Albert Road North cannot take the very largest lorries that still serve some of the site users. I would support some housing but a small unit industrial and office area should still remain.</p>	<p>Comment is noted. The site has now been categorised as an opportunity area now to reflect that the site is in a number of ownerships and as such a comprehensive scheme may not be able to come forward - although we are including it in the plan to encourage this to come forward</p> <p>The opportunity area site allocation seeks to retain as a minimum the same amount of employment floor area as is currently provided but it is recognised that more intensive industrial uses are not appropriate for this residential area. As such, employment space should be for small businesses/start-ups/ incubator space and workshops within the B1 use class (which covers Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.) The intention is that the scheme will be comprehensive redevelopment of the site which will enable more efficient use of land to be achieved. As such, up to 50 new homes could be achieved.</p>	<p>No change</p>
<p>Specifically we have a number of comments regarding the identification of the Alber Road North Industrial Estate as a potential development site:          - Our site on Albert Road North, which is the location of our business premises, is privately owned. Many businesses aim to own their freehold as it makes good financial sense and as a company we have made substantial investment in doing that at ARN          - The Albert Road North employment land is currently occupied by thriving businesses employing local people. The Council's own</p>	<p>Comment is noted. The site has now been categorised as an opportunity area now to reflect that the site is in a number of ownerships and as such a comprehensive scheme may not be able to come forward - although we are including it in the plan to encourage this to come forward</p> <p>The opportunity area site allocation seeks to retain as a minimum 7500 sqm and this should be for employment space should be for small businesses/start-ups/ incubator space and workshops within the B1 use class (which covers Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.)</p>	<p>No change</p>

document 'Employment Area Review' states:  
 Vacancies are historically low across the estate and the site is a viable and attractive business location. The Council refused planning consent to an application in 2011 on the ground of loss of employment land and the more recent development was only made possible by changes to permitted development rights.

- The industrial estate provides affordable rented commercial premises for small businesses that provide a wide mix of jobs. Affordable commercial property is not in abundance in the local area and businesses already struggle to find suitable premises. The loss of Albert Road North employment area will result in local businesses being forced out of the borough.
- The four 'principal' employment areas listed in the DMP are largely occupied and do not contain suitable vacant or necessarily affordable premises. The Council should also consider that many of the newer premium grade or larger industrial premises throughout the local area are 'leasehold' and not 'freehold'. For a successful business who own their freehold, moving to a leasehold property is not an acceptable option.
- The Council's own summary of site characterisation states 'significant access constraint and residential location somewhat affects business environment and suitability for occupiers. This statement is a matter of opinion and does not address the reasons for the access constraints such as the lack of adequate

However, we would not want to see the loss of existing and successful business. In respect of your comment, we have amended the site boundary to exclude the units to the north east of the site.

<p>parking restrictions on the recommended route to the industrial estate via Somers Road. The problem car parking in the surrounding roads is compounded by commuters traveller from Reigate railway station and others working at offices &amp; businesses in and around Reigate that do not have sufficient on-site parking.</p>		
<p>Albert Road North has been lined up as a potential development site. The current access road to this site already struggles with existing demand. I would suggest the provision of an additional access road to Manor Road along with new footpaths and enhanced Street lighting in area.</p>	<p>This would not be possible, the railway line constricts access from the north, as do existing properties on the northern side of the railway line. Coppice Lane is a private road and all the land to the west of the site is Green Belt land.</p>	<p>No change</p>
<p>At present the surrounding roads are not suitable for the heavy goods vehicles that support the current estate occupiers. The traffic is a danger and to other road users and pedestrians and causes significant local disturbances. On a weekly basis I have seen lorises stuck in roads causing traffic chaos and the noise they bring is disruptive.</p>	<p>Comment is noted. The site has now been categorised as an opportunity area now to reflect that the site is in a number of ownerships and as such a comprehensive scheme may not be able to come forward - although we are including it in the plan to encourage this to come forward</p> <p>The opportunity area site allocation seeks to retain as a minimum the same amount of employment floor area as is currently provided but it is recognised that more intensive industrial uses are not appropriate for this residential area. As such, employment space should be for small businesses/start-ups/ incubator space and workshops within the B1 use class (which covers Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.) The intention is that the scheme will be comprehensive redevelopment of the site which will enable</p>	<p>No change</p>

	more efficient use of land to be achieved. As such, up to 50 new homes could be achieved.	
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SSW2		
<p>Increased traffic impact on road, particularly the A217 and the Woodhatch traffic lights - already badly congested area at peak times, existing routes and junction will be overwhelmed</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough’s Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers</li> </ul>	<p>No change</p>

	<p>Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</p> <ul style="list-style-type: none"> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> <li>• Include off road routes to the Primary School.</li> </ul>	
<p>uneven road widths will not accommodate additional traffic or construction traffic without severe detrimental effect on the road system and quality of life of the existing residents.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> </ul>	<p>Site requirements updated to include:</p> <ul style="list-style-type: none"> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> </ul>



	<ul style="list-style-type: none"> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> <li>• Include off road routes to the Primary School.</li> </ul> <p>Policy DES11 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed.</p>	
<p>Many already use these roads as 'rat runs' to avoid congestion in major roads in the area. Both the speed and volume of traffic at existing levels already degrade the quality of life of Betchworth parishioners. Development at this site will increase traffic on narrow rural roads and will make this situation significantly worse</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local</li> </ul>	<p>Site requirements updated to include:</p> <ul style="list-style-type: none"> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross</li> </ul>

	<p>centre (along Prices Lane)</p> <ul style="list-style-type: none"> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> <li>• Include off road routes to the Primary School.</li> </ul>	<p>Primary School, for example through building expansion or improvements to traffic management.</p>
<p>260 houses will add too much traffic pressure to Sandcross Lane and Prices Lane. As the site is on the edge of town, these are the only two roads that people can travel by car to reach other parts of the Reigate/Redhill area. It will also lead to more traffic on the country lanes running west of the site.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough’s Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p>	<p>Site requirements updated to include:</p> <ul style="list-style-type: none"> <li>• Consideration should be given to whether there are opportunities to improve the function of</li> </ul>

	<ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> <li>• Include off road routes to the Primary School.</li> </ul>	<p>Sandcross Primary School, for example through building expansion or improvements to traffic management.</p>
<p>Making road improvements to Prices Lane, presumably widening the road, is likely to destroy business for the local Woodhatch shops, as the parking spaces on the secondary roads for the shops would be lost.</p>	<p>The Woodhatch shops are designated as a local centre to reflect the importance of these shops to the community. The site allocation only refers to improvement of off-carriageway cycle road to the nearby local centre and does not indicate that Prices road should be widened.</p>	<p>Site requirements updated to include:</p> <ul style="list-style-type: none"> <li>• Consideration should be given to whether there are opportunities to improve the</li> </ul>

		function of Sandcross Primary School, for example through building expansion or improvements to traffic management.
No schools are being proposed for the same site. This is not acceptable as there is no guarantee that a school will be built on the Redhill law courts site. Dovers Green School has already been expanded in recent years and so has Sandcross School.	Reigate & Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure. School provision will be made elsewhere within Reigate & Redhill to provide for demand in line with projection work undertaken.	No change
It may be designated 'low grade' green belt, but to those who live opposite it is not.	<p>This comment has been noted. National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of</p>	No change

housing have been brought forward. The sites will then be released in a phased manner.

National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.

Paragraph 80 of the National Planning Policy Framework outlines the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land. The Green Belt designation does not take into consideration the aesthetics or quality of the land. One of the main criteria for identifying sites which could potentially be developed is whether they are sustainable or not.

<p>2) How about food sustainability, when we lose yet another productive field?</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	<p>No change</p>
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<p>Even low grade green belt provide extra 'lung capacity'</p>	<p>This comment has been noted. National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.</p> <p>Paragraph 80 of the National Planning Policy Framework outlines</p>	<p>No change</p>
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	<p>the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the use of recycling of derelict and other urban land. The Green Belt designation does not take into consideration the aesthetics or quality of the land. One of the main criteria for identifying sites which could potentially be developed is whether they are sustainable or not.</p>	
<p>Flooding is an issue now, has got worse over recent years and is unlikely to get better</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>the site allocation requires:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2 - Measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	<p>No change</p>



<p>This site may have strong defensible boundaries (Pg 155 DMP) but I don't think that would stop urban sprawl creepage in the future. How about the field over White Hall Lane....?</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p> <p>Paragraph 80 of the National Planning Policy Framework identifies</p>	<p>No change</p>
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	<p>the five purposes of Green Belt, namely to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. These purposes are taken into account when identifying potential site allocations in the Green Belt.</p> <p>The field to the east of Whitehall lane is also being proposed but as per the above allocations will only be done as part of thh Local Plan process</p>	
<p>This site is too big, and has too many houses proposed. The density is not in keeping with that to the east of the site.</p>	<p>Policy DES1 requires design of new development to 3) Have due regard to the layout, density, plot sizes, building siting, scale, massing, height, and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site.</p> <p>The level of development has been set taking account of the constraints on the site (including topography, views into and out of the site), and the general density of development in the area It is felt that the figure proposed strikes a balance between making best use of the land and delivering an appropriately designed development sensitive to its context.</p> <p>The exact design will be considered through the planning application process</p>	<p>No change</p>

<p>What would be required..?  Infrastructure: Please amend as follows: Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction. Improvements to the Woodhatch junction. At the application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</p>	<p>Suggested wording added</p>	<p>No change</p>
<p>Prices Lane and Sandcross Lane are busy, especially at school pick up and drop off times when it will be dangrous for kids walking to school in the Sandcross area. There would have to be significant road improvements to stop cars mounting the pavements as they do at the moment.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Include off road routes to the Primary School.</li> </ul>	<p>No change</p>

<p>This should also not be at the detriment of Sandcross Lane's rural feel as the views are of fields at the moment. Tree planting is crucial</p>	<p>Policy DES1 requires design of new development to 3) Have due regard to the layout, density, plot sizes, building siting, scale, massing, height, and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site.</p> <p>The level of development has been set taking account of the constraints on the site (including topography, views into and out of the site), and the general density of development in the area. It is felt that the figure proposed strikes a balance between making best use of the land and delivering an appropriately designed development sensitive to its context.</p> <p>The exact design will be considered through the planning application process</p> <p>Policy DES1 requires soft landscaping and NHE3 requires retention of important trees</p> <p>The site allocation also requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside reflecting the Earlswood to Redhill common biodiversity opportunity area</li> <li>• Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new public open space in the west of the site</li> <li>• Protection of existing trees and hedgerows</li> <li>• Incorporate a buffer zone to the existing ditch network within the site to safeguard ecology and water quality</li> </ul>	<p>No change</p>
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<p>the road would become a terrible hazard, as it is a bit of a rat run first thing in the morning and evening rush hour. This is currently bearable but would get worse on the addition of 500-1000 extra cars. The junction of Slipshatch Rd and Sandcross Lane is currently overloaded...fear that added traffic with current frustrations could cause a fatality.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> </ul>	<p>No change</p>
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	<ul style="list-style-type: none"> <li>• Include off road routes to the Primary School.</li> </ul>	
<p>We already have a nightmare scenario with Sandcross school and traffic. This area cannot sustain anymore traffic. The yellow lines do not stop the parents parking and with the garden centre and scout hut enough is enough.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough’s Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where</li> </ul>	<p>No change</p>

	<p>necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</p> <ul style="list-style-type: none"> <li>• Include off road routes to the Primary School.</li> </ul>	
<p>But walking time of 20 minutes to Reigate Station from Sandcross Lane very ambitious; more like 40 minutes in reality Please be realistic about people walking into Reigate town centre and to the station from Sandcross Lane. Local rural lanes are narrow, high sided and unlit and do not have pavements. Local lanes are already used as rat runs and cannot take any more traffic. Vital that access to Woodhatch Junction p156 be adequate as surrounding lanes extremely narrow, unlit and high sided, could become a dangerous rat run without proper infrastructure in place; especially as reality of walking to Reigate Station challenging because of lack of footpaths/pavements/lighting local lanes. This needs to be taken seriously as few people will feel safe to walk or cycle into Reigate from Sandcross Lane and will rely on cars.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where</li> </ul>	<p>No change</p>

	<p>necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</p> <ul style="list-style-type: none"> <li>• Include off road routes to the Primary School.</li> </ul> <p>The walking distances to inform the parking standards have been refined</p>	
<p>South Park/Woodhatch, an area already heavily congested with traffic - long queues in rush hour on A217 (usually extends for three miles or more) and road in from Earlswood lakes is also badly congested. I have to get onto the A217 via the backroad, emerging at The Beehive pub to turn right onto the A217. I have no right of way and I have to force my way into the traffic.</p> <p>Slipshatch Road, is known as the 'rat run' as offers a route to bypass Reigate. Its reverse camber z-bends attract the boy racers - unsuitable for such traffic. The residential roads in Woodhatch are not suited to increased traffic.</p> <p>Outside Sandcross school, it is not uncommon for cars to mount the pavement in order to pass.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential</li> </ul>	<p>No change</p>



<p>Proposed development would lead to several hundred extra cars being forced to use already over-congested roads and place extra load onto unsuitable country roads.</p> <p>The additional traffic from Westvale Park development alone (likely 3000 cars) will bring the area to its knees.</p> <p>The local hospital is only a few miles away and the local ambulance station is situated close to the A217. The worse the traffic congestion problem gets, the slower will be the response time.</p>	<p>roads from rat-running and re-routing</p> <ul style="list-style-type: none"> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> <li>• Include off road routes to the Primary School.</li> </ul>	
<p>The plan is it so concentrated in the south, the north of the borough seems to be rather let off lightly.</p>	<p>The north of the borough is very constrained by key constraints such as Areas of Outstanding Natural Beauty which are given an additional level of protection from development than Green Belt. Areas of Outstanding Natural Beauty are not set by the borough Council.</p>	<p>No change</p>

<p>Reigate is a small town surrounded by beautiful green countryside. Despite being a town, it retains the feeling of a village community. It feels a safe place to live but I fear that this will change greatly. The Reigate we know and love is under threat of becoming just another district in the urban sprawl that will eventually be part of the “Super-city of London.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	<p>No change</p>
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<p>The area has a vast biodiversity. The general openness of the land and these birds make up the ambient sounds of the area. Development on the scale and density of the proposal would obliterate these sound with the cacophony of urban noise pollution. Great crested newts can be found in local ponds which leads to the possibility of them existing in the waterway through the field at Sandcross Lane. These rare animals would not survive in the proposed concrete jungle.</p>	<p>The site allocation requires- biodiversity and green infrastructure enhancements, including links to the wider countryside reflecting the Earlswood to Redhill common biodiversity opportunity area.</p> <p>An ecology survey would be required for this site and any protected species found on the site would have to be accommodated appropriately</p>	<p>No change</p>
<p>Flooding - The land is in fact a flood plain and the earth is not permeable. Hence, when the rains come, water lays for quite some time. The trends in climate change indicate that this part of the country is likely to suffer from increased annual rainfall so the problem is likely to worsen over time as it is, let alone with the added drainage problem associated with so many square miles of concrete and tarmac. In severe weather, the water is within inches of our front door.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>the site allocation requires:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> <li>- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</li> </ul>	<p>No change</p>

	<p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	
<p>Schools - There is a concentration of schools in Reigate but there are not enough school places in the area to accommodate the needs of the current population. Extra houses would mean a considerable increase in the number of children requiring school places.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
<p>With so many new homes already approved and in construction please consider that Reigate residents chose to live in a semi rural setting not the middle of a housing estate. impact on semi-rural character of the area</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the</p>	<p>No change</p>

	<p>Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>potential to create a serious transport problem eg: there is a local school, shops, garden centre and bus route existing in that one area and diverting traffic down Slipshatch Road and/or Whitehall / Clayhall Lane is not the answer and these are not wide enough to take large, heavy loads.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example</li> </ul>	<p>No change</p>

	<p>through building expansion or improvements to traffic management.</p> <ul style="list-style-type: none"> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> <li>• Include off road routes to the Primary School.</li> </ul>	
parking is impossible	<p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p> <p>The site allocation also requires:</p> <ul style="list-style-type: none"> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Include off road routes to the Primary School.</li> </ul>	No change

<p>Safety of construction so close to a primary and junior school.</p>	<p>Policy DES10 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed.</p>	<p>No change</p>
<p>Sandcross schools' previous planning promises made during their recent extension regarding parents walking in have not been fully implemented, and the school traffic is very heavy. It has no appropriate parking, which creates issue for residents as we have no places to park our own cars.</p>	<p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p> <p>The site allocation also requires:</p> <ul style="list-style-type: none"> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Include off road routes to the Primary School.</li> </ul>	<p>No change</p>
<p>The traffic congestion at Woodhatch at peak times is considerable at the moment.[examples provided] Different traffic controlling measures will not alleviate this. A potential 600 plus cars in the area will aggravate it further. (The reality is that there is usually 2 cars per family unit). The footfall in the area has also increased as</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	<p>No change</p>

<p>2 bed / 3 bed houses are being extended into larger family homes.</p> <p>The junctions at Sandcross La, Slipshatch Rd, Prices La, New North Rd, Whitehall La becoming heavily congested. Lorry traffic in and around the area could cause serious problems at the beginning and end of the school day.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> <li>• Include off road routes to the Primary School.</li> </ul>	
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<p>The noise and dust from a development of 260 homes and all that it entails could be detrimental to the pupils currently attending the primary school.</p>	<p>Policy DES10 of the emerging DMP states that the Council will expect all developments to be managed in a safe and considerate manner. Where considered necessary, the Council will require a construction management plan setting out how the construction of development will be managed.</p> <p>Proposed policy DES11 states:</p> <p>1) Development will only be permitted (and subject to compliance with other policies) where it can be demonstrated that (on its own or cumulatively) it will not result in a significant adverse or unacceptable impact on the natural and built environment (including sensitive habitats); amenity; or health and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution. Where there would be potential adverse effects from pollution and adequate mitigation cannot be provided, development will not normally be permitted. <u>This includes pollution from construction</u> and pollutions as a result of the life of the development, and particular attention should be paid to development within Air Quality Management Areas.</p>	<p>No change</p>
<p>The local hospital, surgery and schools are already oversubscribed without an increase in the local population.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
<p>Slipshatch Road, via a short section of Clayhall Lane, joins Flanchford Road which provide a crossing over the river Mole. Therefore it is an important</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network, including in</p>	<p>No change</p>

through route for local traffic. It is a small road, a section of Clayhall Lane is virtually a single lane road and the bridge is a one lane road. Like so much of the local road network, Slipshatch Road is already very busy, especially at peak times. In contrast, Sandcross Lane tends to have slower moving traffic. Therefore, if SSW2 is used, I suggest that the access should be only from Sandcross Lane.

terms of access, and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).

The site allocation requires:

- Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)
- Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.
- Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents
- Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction
- Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing
- Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction
- Include off road routes to the Primary School.

<p>The illustrative plan for SSW2 shows a line of retained trees. I suggest that the area to the south-west of that line of trees should be retained as Green Belt. I did not know the reason for considering the SSW2 site being "low grade" Green Belt but i do not agree that the area south-west of the proposed line of trees should be considered "low grade". Retaining that part as Green Belt would not greatly reduce the number of houses within SSW2 but it would prevent the degradation of the countryside aspect either side of Slipshatch Road once past the continuous built-up section.</p>	<p>The level of development has been set taking account of the constraints on the site (including topography, views into and out of the site), the general density of development in the area, as well as the Green Belt characteristics of the site. It is felt that the figure proposed strikes a balance between making best use of the land and delivering an appropriately designed development sensitive to its context, taking account of the strong boundary that the road to the west provides. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new public open space in the west of the site</li> </ul>	<p>No change</p>
<p>I understand that RBBC have prepared these plans in response to Government pressure. Also, I appreciate that the Council has been working hard to impress on the Government that building so many new homes is putting intolerable pressure on our community. Not just that spare land is in short supply but also so much of our infrastructure is being overwhelmed by the current</p>	<p>Government policy identifies that the need to provide housing in line with the targets set for the Council by the Governement means that Green Belt can be considered if there are no other options. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.</p> <p>Reigate &amp; Banstead Borough Council have worked with</p>	<p>No change</p>

<p>pressures, made worse by having to build thousands of extra homes. I remember when the M25 was first completed. Reigate and Dorking got back the use of the A25 at weekends and the villages within the "Dorking Box" were no longer overwhelmed by local traffic trying to find alternative routes to get around. Over the years, traffic has become so bad, we need the M25 to be greatly enlarged and the local A roads need to be converted into dual carriage roads. Doing that would mean demolishing many houses - where would those displaced people go? It is not just the road network, but our local hospital, doctor's surgeries etc.</p>	<p>infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	
<p>More importantly though, with many species of wildlife under threat like never before, as revealed in the recent State of Nature report launched by Surrey resident Sir David Attenborough, it has never been more important that we protect their habitat – our fields, our meadows and our woodlands. In addition to all that, recent research has increasingly shown that when people have the</p>	<p>National policy and the policies proposed in the DMP requires development to make best use of land whilst also providing for important elements such as open space, increases to biodiversity where possible, protection for trees/hedges etc. Policies NHE2 and NHE3 in the DMP cover trees and biodiversity. The site allocation requires:</p> <ul style="list-style-type: none"> <li>• biodiversity and green infrastructure enhancements, including links to the wider countryside reflecting the Earlswood to Redhill common biodiversity opportunity area.</li> <li>• Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new public open</li> </ul>	<p>No change</p>

<p>chance to connect with nature, it is of huge benefit not only to their physical health but also their mental health too. So, for all these reasons, we should be protecting and cherishing our countryside, not building houses on it – especially when there are so many brownfield sites available in our towns and cities that would benefit from this much-needed investment.</p>	<p>space in the west of the site</p> <ul style="list-style-type: none"> <li>• Protection of existing trees and hedgerows</li> <li>• Incorporate a buffer zone to the existing ditch network within the site to safeguard ecology and water quality</li> </ul> <p>An ecology survey would be required for this site and any protected species found on the site would have to be accommodated appropriately in line with statutory procedures associated with these to ensure they are appropriately protected</p> <p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner. Broad Areas of Search were identified in the Core Strategy and further work has been undertaken in order to identify the proposed sustainable urban extensions. This can be found in the Sustainable Urban Extensions Technical Stage 1 &amp; 2 Reports.</p> <p>Policy OSR2 requires that new developments include open space</p>	
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	and OSR1 provides protection for all areas designated as Urban Open Space.	
There seems to be no provision for a school.	Reigate & Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure. School provision will be made elsewhere within Reigate & Redhill to provide for demand in line with projection work undertaken.	No change
impact on health care provision (the South Park Surgery has been under threat of closure at least twice in the last few years and is the only one serving the area).	Reigate & Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.	No change

<p>change the feel of the area, rural feel of Reigate is a key element to its appeal.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	<p>No change</p>
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Loss of views	<p>The planning portal notes "A material consideration is a matter that should be taken into account in deciding a planning application or on an appeal against a planning decision. However, issues such as loss of view, or negative effect on the value of properties are not material considerations."</p> <p><a href="http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf">http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf</a></p>	No change
<p>The area of South Park is already densely populated. Traffic congestion is already a problem, to build any more houses would only increase this problem and even if certain road junctions were altered the bottle neck of traffic would move further along the roads. There are many occasions when the traffic queues bumper to bumper from Reigate town centre back along the A217 blocking roads in South Park and Woodhatch.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. See proposed policy TAP1 for further requirements. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of off-carriageway cycle routes to the nearby local centre (along Prices Lane)</li> <li>• Consideration should be given to whether there are opportunities to improve the function of Sandcross Primary School, for example through building expansion or improvements to traffic management.</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/services to new and existing residents</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential</li> </ul>	No change



	<p>roads from rat-running and re-routing</p> <ul style="list-style-type: none"> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> <li>• Include off road routes to the Primary School.</li> </ul>	
<p>This field is bordered by mature trees and hedges and it would be a great loss of habitat for many wildlife and birds. This field is not a bit of waste ground, it has been planted every year for the past 32 years and this Spring sheep grazed on it.</p>	<p>National policy and the policies proposed in the DMP requires development to make best use of land whilst also providing for important elements such as open space, increases to biodiversity where possible, protection for trees/hedges etc. Policies NHE2 and NHE3 in the DMP cover trees and biodiversity. The site allocation requires-:</p> <ul style="list-style-type: none"> <li>• biodiversity and green infrastructure enhancements, including links to the wider countryside reflecting the Earlswood to Redhill common biodiversity opportunity area.</li> <li>• Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new public open space in the west of the site</li> <li>• Protection of existing trees and hedgerows</li> <li>• Incorporate a buffer zone to the existing ditch network within the site to safeguard ecology and water quality</li> </ul> <p>An ecology survey would be required for this site and any protected species found on the site would have to be accommodated appropriately in line with statutory procedures associated with these to ensure they are appropriately protected</p>	<p>No change</p>

<p>The children of Sandcross grow in their formative years looking out from the school playground across the wonderful Surrey countryside, your proposal to build on that very same green belt land will rob generations of and understanding of the countryside that they can discover with their own eyes. Land that allows a transition from urban housing into the wonderful Surrey countryside is so important and should not be lost. If development is needed use existing brown field sites within the borough not our precious green belt.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	<p>No change</p>
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<p>The floodplain is inundated every year, in the fields at the front of Slipshatch Road and at the back of Slipshatch Road. Two thirds of the gardens are underwater in the rainy season; all the farmer's ditches are full to overflowing. Building on the greenbelt here would only mean this water would come into our homes and ruin them, and of course all new build would be under threat of flooding as well.</p> <p>Can we expect the council to indemnify all existing property's owners against flood damage caused by the myopic and technically flawed studies so far published?</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>the site allocation requires:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> <li>- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	<p>In line with updated Strategic Flood Risk Assessment Level 2 inclusion of following requirement in site allocation:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> </ul>
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<p>Area flood - very careful consideration should be given to the risk of flooding that these developments could cause in a low-lying area close to the River Mole. regularly suffer flooding in the surrounding fields and gardens during periods of sustained heavy rainfall.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>the site allocation requires:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2 - Measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	<p>In line with updated Strategic Flood Risk Assessment Level 2 inclusion of following requirement in site allocation:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> </ul>
<p>It would be important to regularly maintain existing watercourses / ditching to ensure floodwaters can drain away.</p>	<p>The site allocation requires development to Incorporate a buffer zone to the existing ditch network within the site to safeguard ecology and water quality. This will</p>	<p>In line with updated Strategic Flood Risk Assessment Level 2 inclusion of following requirement in site allocation:</p>

		<ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> </ul>
<p>the ground is very close to the water table...if the field opposite my house becomes a concrete jungle the rain water will quickly run into any area of open ground however small. This could result in our gardens being flooded. No amount of drainage would stop all the rainwater which the field currently acts as a sponge and disperses. Concern that development will result in flooding of property that will make home impossible to sell or insure.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>the site allocation requires:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> <li>- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	<p>In line with updated Strategic Flood Risk Assessment Level 2 inclusion of following requirement in site allocation:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk</li> </ul>

		Assessment Level 2
<p>The proposed site for 260 new homes on the Sandcross Lane site is transversed by streams. Many houses in the South Park area have wells (frequently unmarked on maps). The water table does get high and the site is low lying and could cause flooding. I suggest that the area is liable to flood as the surrounding roads do in the winter. Plus underground water courses.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>the site allocation requires:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> <li>- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	<p>In line with updated Strategic Flood Risk Assessment Level 2 inclusion of following requirement in site allocation:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> </ul>

<p>This is Greenbelt land, linking with outskirts of Reigate, Reigate Priory Park and impairs the gap between Reigate and Leigh. Development is against Government policy and the NPPF guidelines.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options.</p>	<p>No change</p>
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<p>Loss of good quality arable land which is used for this purpose, weakening future food security.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. It is felt that these sites are the most appropriate sites to be released. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	<p>No change</p>
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<p>Damage to local ecology, the land in question is home to protected species such as owls, bats and buzzards, snakes, frogs, toads and newts. Also Foxes, deer and other animals</p>	<p>National policy and the policies proposed in the DMP requires development to make best use of land whilst also providing for important elements such as open space, increases to biodiversity where possible, protection for trees/hedges etc. The site allocation states that development must:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, reflecting the adjacent Holmesdale Biodiversity Opportunity Area.</li> <li>• Protection and enhancement of areas of ancient woodland and other areas of significant woodland, including provision of an appropriate buffer zone and long-term management proposals</li> <li>• Design measures to protect and enhance landscape quality, including building heights and massing which ensure the development is not visible in long-range views</li> </ul> <p>Many species are protected so any planning application would have to adhere to the necessary procedures associated with these to ensure they are appropriately protected</p>	<p>No change</p>
<p>Reigate Heath SSI is already impacted and degraded by the number of recreational visitors, adding a development of this size is bound to cause additional stress to this site as the locality is so close.</p>	<p>NHE2 states that development that is likely to have an adverse effect on the special interest features of a Site of Special Scientific Interest will only be permitted where it is demonstrated that the benefits of the development in that location clearly outweigh the impacts on the special interest feature and on the national network of Sites of Special Scientific Interest, and any impacts will be suitably mitigated</p>	<p>No change</p>

<p>Severe light pollution will arise from such a high number of houses would be detrimental to local species, the rural surrounding and existing residents.</p>	<p>Proposed Policy DES11 requires the following which would have to be adhered to. If a scheme could not mitigate against unacceptable impact then it would not be permitted. This would have to be demonstrated at a planning application stage.</p> <p><u>DES11</u></p> <p>1) Development will only be permitted (and subject to compliance with other policies) where it can be demonstrated that (on its own or cumulatively) it will not result in a significant adverse or unacceptable impact on the natural and built environment (including sensitive habitats); amenity; or health and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution. Where there would be potential adverse effects from pollution and adequate mitigation cannot be provided, development will not normally be permitted. This includes pollution from construction and pollutions as a result of the life of the development, and particular attention should be paid to development within Air Quality Management Areas.</p> <p>2) Development for new housing or other sensitive development will not normally be permitted where existing fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution are unacceptable and there is no reasonable prospect that these can be mitigated against.</p> <p>3) Noise sensitive uses should be located away from existing sources of noise. If no other reasonable alternative sites exist, development will only be permitted if the noise can be satisfactorily mitigated to acceptable levels.</p> <p>5) Measures to reduce the amount of air pollution in the area will be encouraged. Within areas of poor air quality (as defined by the presence of Air Quality Management Areas) development must be designed to minimise the occupants' or users' exposure to air pollution, both internally and externally.</p>	<p>No change</p>
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<p>Existing transport routes and junctions will be overwhelmed by this number of households, increasing air pollution</p>	<p>Proposed Policy DES11 requires the following which would have to be adhered to. If a scheme could not mitigate against unacceptable impact then it would not be permitted. This would have to be demonstrated at a planning application stage.</p> <p><u>DES11</u></p> <p>1) Development will only be permitted (and subject to compliance with other policies) where it can be demonstrated that (on its own or cumulatively) it will not result in a significant adverse or unacceptable impact on the natural and built environment (including sensitive habitats); amenity; or health and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution. Where there would be potential adverse effects from pollution and adequate mitigation cannot be provided, development will not normally be permitted. This includes pollution from construction and pollutions as a result of the life of the development, and particular attention should be paid to development within Air Quality Management Areas.</p> <p>2) Development for new housing or other sensitive development will not normally be permitted where existing fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution are unacceptable and there is no reasonable prospect that these can be mitigated against.</p> <p>3) Noise sensitive uses should be located away from existing sources of noise. If no other reasonable alternative sites exist, development will only be permitted if the noise can be satisfactorily mitigated to acceptable levels.</p> <p>5) Measures to reduce the amount of air pollution in the area will be encouraged. Within areas of poor air quality (as defined by the presence of Air Quality Management Areas) development must be designed to minimise the occupants' or users' exposure to air pollution, both internally and externally.</p>	<p>No change</p>
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	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough’s Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL). The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction.</li> <li>• Improvement and extension of pedestrian and cycle facilities, including crossing points on Dovers Green Road</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Dovers Green Road</li> </ul>	
<p>The proposal for the development off Sandcross Lane in particular is ludicrous and paves the way for complete desecration of the countryside surrounding Reigate. It's only a matter of time before the solar farm offers the council enough money to give it the go ahead. That's how cynical people are about the current council.</p>	<p>National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council</p>	<p>No change</p>

	<p>cannot force landowners to build on their land.</p> <p>However, in order for us to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released. Government policy identifies that the need to provide housing in line with the targets set for the Council by the Government means that Green Belt can be considered if there are no other options. As part of this, an assessment of the boroughs actual need identified that the borough actually had a need for 600 - 640 homes to be provided, however the Council were able to argue that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.</p>	
<p>This Green Belt site does not appear to have a clearly defined boundary. This calls into question why the sites and site boundaries elsewhere have been chosen and defined – it would appear that man-made features (road boundaries) have driven planning</p>	<p>The Green Belt review has been undertaken in line with national policy (NPPF) which states: When defining boundaries, local authorities should: ...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The Green Belt review gives further detail around methodology and site assessments</p>	<p>No change</p>

<p>rather than natural features. This site also reflects the same lack of consideration given to ecological, landscape and biodiversity aspects (as well as sustainability of transport access) for the sites east of Redhill. The area to the west of the small stream looks illogical for inclusion, as the stream would provide a more natural boundary to development, which could be strengthened through tree planting to form a clear natural boundary to this site.</p>		
<p>The site on the west side of Sandcross Lane from the Sovereign to the Nursery could be used for housing say 2 floor apartments. It is currently in an uncared for state and I would regard as infilling</p>	<p>This forms part of the proposed site allocation SSW2</p>	<p>No change</p>
<p>I think this should be the very last resort in terms of the SUEs, to be used only if required after all others have been developed. Wording in relation to prioritisation of the SUEs.</p>	<p>Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.</p>	<p>No change</p>
<p>Perhaps the Sovereign centre could be improved and expanded giving them more out door space.</p>	<p>The site allocation has been updated as follows:</p> <ul style="list-style-type: none"> <li>• Enhancements to local community provision</li> </ul>	<p>The site allocation has been updated as follows:</p>

		<ul style="list-style-type: none"> <li>• Enhancements to local community provision</li> </ul>
not expect to see high rise buildings as these would not fit with the current structures which are two storey	Policy DES1 requires design of new development to 3) Have due regard to the layout, density, plot sizes, building siting, scale, massing, height, and roofscapes of the surrounding area, the relationship to neighbouring buildings, and important views into and out of the site.	No change

SSW7		
Increased traffic impact on the A217 and the Woodhatch traffic lights, an already badly congested area at peak times.	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this</li> </ul>	No change

	<p>junction.</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities, including crossing points on Dovers Green Road</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Dovers Green Road</li> </ul>	
<p>One asinine statement is that as the areas around Slipshatch Road are contiguous with housing on at least one boundary, this somehow justifies the use of farm land for housing. This totally bogus reasoning is also used on most other areas being consulted on as well and reflects sadly on the intellectual abilities of the authors.</p> <p>In five years' time the same argument will be used again for the next field and so on until we have achieved Central City stretching from London to the South Coast.</p> <p>That such statements are made in these documents for most of the areas under consideration indicates that these documents are simply sops to the public and cannot be taken seriously. They are certainly not technically sound or robust and can faulted on a large number of issues far too many to be included in this letter. But a rebuttal document can be produced to cover many of the</p>	<p>This comment has been noted. National Planning Policy Paragraph 47 requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, it is important to note that the Council cannot force landowners to build on their land.</p> <p>However, in order for the Council to deliver the target there may need to be release of a small amount of Green Belt. Proposed policy MLS1 says that this land will continue to be treated as Green Belt until the Council are no longer able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The sites will then be released in a phased manner.</p> <p>The adopted Core Strategy identified Broad Areas of Search for release of development. Further works (Sustainable Urban Extensions Stage 1 &amp; 2 Technical Reports) have been undertaken to identify possible sites. The methodology used have been assessed through the adopted Core Strategy process. It is felt that these sites are the most</p>	<p>No change</p>



<p>geographic areas selected by our poor quality planners. We have NO confidence in the ability or the impartiality of the planners. The planning record for Reigate and nearby areas is hardly to their credit. The vast number of empty offices indicate a total lack of planning expertise (some are now being converted to housing, but they should not have been there in the first place). If these white elephants had been used initially for housing perhaps there would not be a shortage of housing in the area today.</p>	<p>appropriate sites to be released taking account of factors such as availability, assessment of constraints, sustainability and Green Belt impact. For specific details on these sites please see the before mentioned reports.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	
<p>What would be required..? Please amend as follows: Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</p>	<p>Suggested wording added</p>	<p>Suggested wording added</p>

<p>Areas selected Castle Drive is NOT suitable for any development of the kind suggested. It is already a busy road and well populated; however, the bus service to the area is on a very restricted time table which would mean any dwellings built would need transport - hence more traffic and noise.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction.</li> <li>• Improvement and extension of pedestrian and cycle facilities, including crossing points on Dovers Green Road</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Dovers Green Road</li> </ul>	<p>No change</p>
<p>I believe that this site should be not be considered together with the adjoining site, but appraised on its own merit. Although defined as Green Belt this site was earmarked for residential development when the Green Belt land to the East was compulsory purchased by the Local Authority for housing. This site has a 9" foul water sewer connection laid to the Northern boundary and all main services are available nearby. A local bus</p>	<p>The site has been separated into two land parcels</p>	<p>No change</p>

<p>route stop is almost opposite the entrance to the site and local shopping is available within walking distance making possible development sustainable.</p>		
<p>believe that they could be redeveloped early in the priority list of SUEs (if not in advance of that).</p>	<p>Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.</p>	<p>No change</p>
<p><b>SSW7</b> - We fully support the proposed reserve urban extension site known as HARTSWOOD NURSEY. However the Potential reserve urban extension site: SSW7- HARTSWOOD NURSEY AND LAND WEST OF CASTLE DRIVE, REIGATE appears to be allocated as a joint site which we object to. Neither owner has made representations towards a joint housing allocation. These sites should be allocated separately as there is no direct link between to two sites. They both have separate access points and different characteristics. Linking both sites could also impede the delivery of the sites going forward as the sites are in separate ownership with possible different timetables and objectives.</p> <p>The Key constraints refer to "Contamination". The Council give no justification or reason for the assumption</p>	<p>The site has been separated into two land parcels. The site allocations have been updated accordingly.</p> <p>We have consulted with our environmental health department who indicate that from their records there could be contamination issues on this site.</p> <p>The map on pg 11 of the following document identifies that this site lies within the Earlswood to Redhill common biodiversity BOA. As such, in line with policy NHE2 and the Green Infrastructure any scheme on this site should consider what could be incorporated into the development, in a proportionate manner, to enhance biodiversity:  <a href="https://surreynaturepartnership.files.wordpress.com/2014/11/biodiversity-opportunity-areas_surrey-nature-partnership_20151.pdf">https://surreynaturepartnership.files.wordpress.com/2014/11/biodiversity-opportunity-areas_surrey-nature-partnership_20151.pdf</a></p> <p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. A scheme of this size would still have an impact on the local highways network.</p>	<p>The site allocation has been updated for clarity, and now states: • Appropriate on-site public open space and play facilities in line with policy OSR2- Open space in new developments</p>

<p>that the sites might be contaminated. Where is the evidence the Council have that the current or past use of the site would suggest possible contamination?</p> <p>"Flooding/ surface water flooding" refers to the northern site and the "Heritage" setting of the listed building onto Dovers Green Road refers to the Hartswood Nursery site.</p> <p>The general design approach and mitigation we general support. However, the delivery of biodiversity and green infrastructure enhancements linking the wider countryside to the Earlswood to Redhill Common biodiversity opportunity area needs to be justified and show a direct connection to the site. It must also be reasonable and proportionate. We are not convinced this objective is justified or practical as the only means of access to these areas is via the existing public footpaths on Dovers Green Road or via the school playing field to the rear of Hartswood Nursery?</p> <p>What are the justifiable reasons for the level of improvements and extensions of pedestrian and cycle facilities including crossing points on Dover Green Road from an appropriate 20 unit housing site</p>	<p>The site allocation requires improvements to bus infrastructure/passenger facilities, which includes the physical facilities i.e. bus stops</p> <p>The requirement for improvement and extension of pedestrian and cycle facilities etc is reflective of discussions with Surrey County Council, more information on which can be found here:  <a href="http://www.reigate-banstead.gov.uk/downloads/file/2649/sustainable_urban_extensions_stage_2_site_specific_technical_report">http://www.reigate-banstead.gov.uk/downloads/file/2649/sustainable_urban_extensions_stage_2_site_specific_technical_report</a></p> <p>The site allocation has been updated for clarity, and now states: • <u>Appropriate on-site public open space and play facilities in line with policy OSR2- Open space in new developments</u></p>	
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<p>with existing access onto the existing road network. Are the Council suggesting the existing bus service provision along Dovers Green Road is inadequate to serve a 30 unit housing site? Again is the provision of a 30 unit scheme likely to have significant or demonstrable impact upon the Wood hatch junction. We believe this is highly unlikely and therefore questionable.</p> <p>What are the " appropriate on-site public open space and play facilities" needed on this site. If a assessment has been made to justify this obligation specific facilities should be known and identified for the site(s).</p>		
<p>SSW2, SSW7 and SSW9, these will need to be considered and assessed in combination rather than in isolation, in terms of their cumulative impacts on the local highway network, including the Woodhatch Road junction.</p>	<p>The site allocations for these sites requires "Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction."</p>	<p>No change</p>

<p><b>Impact on local infrastructure</b> - in particular schools and health care provision (the South Park Surgery has been under threat of closure at least twice in the last few years and is the only one serving the area).</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>
<p><b>Flooding</b> - Very careful consideration should be given to the risk of flooding that these developments could cause in a low-lying area close to the River Mole.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken, which provides details on water issues on this site. Part of this assessment looks at site allocations, including this site and any development would need to take account of this. Informed by this the site allocation requires:</p> <ul style="list-style-type: none"> <li>- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs. At the planning application stage, a site-specific flood risk assessment (considering all sources of flooding) and surface water drainage strategy will be required, using the Strategic Flood Risk Assessment.</li> <li>- Layout to ensure no development on land within Flood Zones 2 and 3</li> </ul>	<p>No change</p>

SSW9		
<p>Likely that there would be increased traffic along Lonesome Lane (new residents travelling south or cutting through Lodge Lane to join the A23) and A217. Traffic from the proposed development would also impact on the estate at the top of Lonesome Lane as cars cut through Lynn Walk etc to reach Woodhatch Road/Pendleton Road and the A23. ncreased traffic impact on the Woodhatch</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused</p>	<p>No change</p>

<p>traffic lights, an already badly congested area at peak times.</p> <p>SSW9: Any development on these sites will exacerbate the traffic problems residents of Woodhatch and South Park have to deal with on a daily basis. There is a large number (over 1000) homes already being built further along the A217 - the residents of these homes will add to the traffic problems we already experience. The infrastructure in the South West area of Reigate cannot support any additional volumes of population.</p>	<p>anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</li> <li>• Safe highway access, including through improvements to the existing junction onto the A217</li> <li>• Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction</li> <li>• Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing</li> <li>• Local improvements to existing bus infrastructure/passenger facilities in and around Dovers Green Road</li> <li>• Improvement and extension of pedestrian and cycle facilities on Dovers Green Road and Lonesome Lane and upgrading of the existing bridleway (BW61) through the site</li> </ul>	
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<p>Danger of creating too much of a ribbon development close to Dovers Green Road in our stretch which would have a big impact on the feeling of spaciousness created by the grass verges on each side of the A217 as one leaves Reigate driving south beyond Woodhatch</p>	<p>National government require that the Council maintain a 5 year housing land supply in order to deliver our housing target of 460 homes a year. As it is predicted that toward the end of the plan period (plan period is 2012 - 2027) urban sites may not be sufficient to provide a 5 year housing supply, Green Belt land must be considered. The Core Strategy identified Broad Areas of Search including South Reigate. Further technical work has been undertaken to identify possible sites within these areas. This work is detailed in the Sustainable Urban Extensions Technical Reports 1 &amp;2. The Sustainable Urban Extensions proposed are the sites which the Council feels most appropriate for release. The Development Management Plan Reg 19 also identifies a number of town centre opportunity sites. It is intended that these will come forward before Green Belt land is released, as will other windfall sites. Proposed policy MLS1 notes that the Sustainable Urban Extensions will only be released once the Council is unable to demonstrate a five year land supply, they will then be released in a phased manner. Until this time the land will continue to be treated as Green Belt.</p> <p>National Planning Policy Framework paragraph 83 says that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Land will therefore not continually be released.</p>	<p>No change</p>
<p>to be assessed, in particular schools and health care provision (the South Park Surgery has been under threat of closure at least twice in the last few years and is the only one serving the area).</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing,</p>	<p>No change</p>



	<p>this will help the Council deliver the required infrastructure.</p>	
<p>Very careful consideration should be given to the risk of flooding that these developments could cause in a low-lying area close to the River Mole.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>the site allocation requires:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment should be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> <li>- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	<p>No change</p>

<p>Our cottage is at some risk of flooding as on a flood plain so presumably properties built immediately adjacent will be at similar risk. The drains on the road outside our property are non functional (grass growing from some of them!) In addition the pavement where our drive is regularly flooded 510-80% with even the smallest amount of rain, which persists for days and is an unnecessary hazard to pedestrians - heavier rain causes water to cascade across our front path making this dangerous (slippery dangerous sloping old red brick path currently being replaced by reclaimed flagstones to match existing nearer the house). The problem where our driveway meets the road could be easily remedied by building up the pavement a little at this point to change the gradients towards the road, rather than the cosmetic patching which has been done approx. twice over the last 4 years.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>the site allocation requires:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment must be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> <li>- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p> <p>However, outside of the impacts of new development, existing flooding is not within the remit of the Development Management Plan. Various stakeholders are involved in existing flooding management, and this is coordinated by Surrey County Council. More information can be found here:  <a href="https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf">https://www.surreycc.gov.uk/__data/assets/pdf_file/0005/136724/Surrey-Local-Flood-Risk-Management-Strategy-FINAL_v2.pdf</a></p>	<p>No change</p>
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<p>Shame to see this land go but is probably acceptable but with adequate parking.</p>	<p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No change</p>
<p>This is going to fundamentally change the whole nature of the area. It is currently green belt and the drive is widely used locally by walkers, dog-walkers and cyclists for safe, traffic-free, access to the fields and woods off Lonesome Lane. It is one of the few ways we can get to the countryside without walking along the ever more busy A217, which is not pedestrian friendly, or taking the car. I feel that development on this site, especially if access is onto the A217 via the Dovers Farm Drive will result in a significant loss of amenity for the local area.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of land outside urban areas. This will only come forward if the Council can no longer demonstrate a 5 year housing supply.</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Improvement and extension of pedestrian and cycle facilities on Dovers Green Road and Lonesome Lane and upgrading of the existing bridleway (BW61) through the site</li> </ul>	<p>No change</p>

<p>What would be required..? Please amend as follows: Improvements to the local highway network, including the Dovers Green Road/Sandcross Lane junction and Slipshatch Road/Sandcross Lane junction. Improvements to the Woodhatch junction. At the planning application stage developers would be required to carry out a feasibility study and transport modelling at this junction, and where necessary contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction</p>	<p>Suggested wording added</p>	<p>Suggested wording added</p>
<p>Amend Plan - Further to your email asking us to confirm the boundary of our garden, please see the map below. I have outlined our boundaries in ink. I trust you will rectify the matter swiftly.</p>	<p>Thank you for confirming - this has been amended on the map.</p>	<p>Proposal map amended</p>
<p>I think this should be the second last resort in terms of the SUEs (second only to SSW7), to be used only if required after all others have been developed.</p>	<p>Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.</p>	<p>No change</p>
<p>Suggestion - As owners of a much-loved Grade II listed cottage we are anxious to preserve its unique character and that of its surroundings as much as possible. There is a mature large oak in the north-west corner of our garden, which is subject to a preservation order, as, I believe, may be at least one of our pine trees also at the edge of our garden. With this in mind we assume that any new building will not be too close to these trees. If back gardens fo planned new houses are 'back-to-back' with our own garden this should help to prevent undue proximity of new houses to our cottage and</p>	<p>The actual design of the development will be subject to a planning application but this would need to appropriately accommodate protected and mature trees as well as neighbouring amenity. The matter of the drainage would also be something that would be covered thorough the planning application process.</p>	<p>No change</p>

<p>prevent it being crowded in by taller oppressive modern new builds. I should like to bring one other specific matter to your attention: We currently have private sewerage treatment facility in our garden, serviced every 6 months, but it does discharge treated 'clean' effluent into the ditch to the front of our property towards Castle Drive. With the extended mains drainage system clearly required for any proposed development near our property, we wondered whether our own drainage pipework should also be at that stage be incorporated into mains drainage for the general good.</p>		
<p>Mini-roundabout where Castle Drive meets A217? Speeding traffic (the rule rather than the exception) makes the current T-junction difficult if not potentially dangerous with anticipated increased traffic flow, especially as visibility is poor owing to shrubs to the left as one exits Caste Drive.</p>	<p>Existing roads are the remit of Surrey County Council - their strategies can be found here- <a href="https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies">https://www.surreycc.gov.uk/roads-and-transport/roads-and-transport-policies-plans-and-consultations/surrey-transport-plan-ltp3/surrey-transport-plan-strategies</a> Any planning application would have to demonstrate that safe access could be achieved and at this stage, if it was considered that additional traffic would have an unacceptable impact, then the scheme would have to include appropriate mitigation.</p>	<p>No change</p>

<p>The identified site for potential development at Meath Green Lane comes with some serious key constraints that to some opinions constitute the site unsuitable for development, mainly due to the flood risks involved that significantly reduce the flood risk-free area. As a consequence, this site will provide a limited number of residential units with any future potential increase or expansion impossible.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area. It is not felt that the flooding on the site would stop the potential for development on the parts out side the flood area.</p> <p>the site allocation requires:</p> <ul style="list-style-type: none"> <li>• A site specific flood risk assessment must be undertaken which takes account of the Strategic Flood Risk Assessment Level 2</li> <li>- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs.</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	<p>No change</p>
<p>Access to development planned on land adjacent to our property would probably be best, in our opinion, from an access road from Castle Drive just where it turns right (near house 146 and first corner coming from A217).</p>	<p>Noted. The access and egress of this site would need to be tested as part of the planning application stage.</p>	<p>No change</p>

<p>Our Grade II listed cottage is set back from the road with a substantial grass verge (owned by the Council) stretching back from the pavement to the edge of our property and this verge extends along to Castle Drive, fronting the private land to be developed. Whilst it appears from the planning proposal that the verge between our boundary and the A217 will be preserved it would seem preferable, at least from our point of view, that the building line for new properties also be continued along to Castle Drive roughly in line with our cottage or at least not too much further forward to preserve the pleasing 'countrified' aspect which opens out along this stretch of the A217 and also to avoid our cottage being overwhelmed by a line of new buildings too near the road</p>	<p>The site allocation requires development to</p> <ul style="list-style-type: none"> <li>• Protect and respect the appearance of the common land verge</li> </ul>	<p>No change</p>
<p>woodland along Lonesome Lane south of the junction with Ashdown Road should be retained to screen the new houses</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Protection of existing trees and hedgerows, in particular the area of woodland along Lonesome Lane should be retained</li> </ul>	<p>No change</p>

HOR1

<p>This site could provide challenges in respect of retail access [deliveries] and car parking for retail staff or residents or is the borough assuming use of the central car park but at cost whereas other town centre developments have included parking, for example, Russell Square. We have concerns about the loss of parking, which will in future be needed with a busier town centre and increase in population. This car park is also used for a number of community events throughout the year. We would also like to see the retention of the “No 54” café adjacent to the car park, which is well used by local community groups. This site has possibilities but with the above concerns.</p>	<p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p> <p>The allocation also requires:</p> <ul style="list-style-type: none"> <li>• Development proposals to consider town centre parking needs</li> <li>• Provision of appropriate parking for proposed uses</li> </ul> <p>TAP1 also requires appropriate servicing provision</p> <p>It is understood that the Regeneration Team will be improving the pedestrian precinct on the High Street which would provide a space for activities. It is proposed that the cafe is not included in the site allocation boundary</p>	<p>Site allocation boundary amended to not include the cafe</p>
<p>The Borough Council and the Town Council have proved feeble in their attempts to attract and retain the kinds of market which inevitably prove a successful draw to people to shop in the town: whether such regular events were to take place in the high street itself, or on the car park space, this area needs to be retained.</p>	<p>It is understood that the Regeneration Team will be improving the pedestrian precinct on the High Street which would provide a space for activities, such as a market.</p>	<p>No change</p>



<p>What would be required...? Please include Improvements to the existing subway adjacent to the site to provide a pedestrian and cycle link to Horley Station.</p>	<p>Added</p>	<p>Suggested wording added</p>
<p>The DMP covers regeneration and sustainability of Horley town centre yet you are looking at developing High Street car park with the loss of valuable parking which will turn people away if they are unable to park.</p>	<p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets . The site allocation also requires that Development proposals to consider town centre parking needs</p>	<p>No change</p>
<p>Should remain a car park as the increase in local housing means more parking is needed.</p>	<p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets . The site allocation also requires that Development proposals to consider town centre parking needs</p>	<p>No change</p>

<p>Removing this car park will mean that there will be more pressure on the central car park.</p>	<p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets . The site allocation also requires that Development proposals to consider town centre parking needs</p>	<p>No change</p>
<p>It would be good if this included some attractive outdoor seating and a grass area.</p>	<p>Policy DES1 states that development should provide street furniture and public art where it would enhance the public realm and/or reinforce a sense of place.</p>	<p>No change</p>

HOR2 - This site has been removed from the DMP as has had a number of recent planning applications approved

<p>HOR3</p>		
<p>We note that on map building marked Thornbury Vet Centre is a children's nursery.</p>	<p>The base map is one that we have obtained from the ordance survey</p>	<p>No change</p>

<p>I do not want to see another ugly out-of-proportion block like Russell Square.</p>	<p>The policies in the adopted Core Strategy and the emerging DMP seek to ensure that design has due regard to the layout, density, plot sizes, building siting, scale, massing, height, and roofscapes of the surrounding area and the relationship to neighbouring buildings, whilst making most efficient use of land. .</p> <p>Russell Square would have been considered under the existing policies contained in the Local Plan 2005. However design is an extremely subjective area of discussion - of course, it cannot ever be guaranteed that the results will please all of the people all of the time.</p>	<p>No change</p>
<p>Disappointed this is likely to be pulled down and the facades not retained meaning that Horley will lose character.</p>	<p>Policy DES1 of the DMP states new development must: Promotes and reinforces local distinctiveness and respects the character of the surrounding area, including positive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene.</p>	<p>No change</p>

HOR4 - Site is removed as Royal Mail have confirmed they have no intention to redevelop the site

HOR5

<p>TDC note that the Horley library is in the ownership of Surrey County Council and that redevelopment for residential purposes would be reliant on finding an alternative site for the library. Horley library is utilised by TDC residents, particularly in the Smallfield and Burstow areas and wholesale loss of this facility would be opposed.</p>	<p>Surrey County Council manage the libraries in our borough and own the current library site, so they would have to provide a library this site or elsewhere if permission was to be given to redevelop this site. It is understood that the intention is to provide a new library in the new Russell Square development in the centre of Horley (See more details here - <a href="https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1">https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1</a> ) however as this has not been finalised yet we will retain in the policy the need to retain or relocate the existing library as we understand the importance of this facility.</p>	<p>No change</p>
<p>Where would the Horley library be located if that site is developed?</p>	<p>Surrey County Council manage the libraries in our borough and own the current library site, so they would have to provide a library this site or elsewhere if permission was to be given to redevelop this site. It is understood that the intention is to provide a new library in the new Russell Square development in the centre of Horley (See more details here - <a href="https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1">https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1</a> ) however as this has not been finalised yet we will retain in the policy the need to retain or relocate the existing library as we understand the importance of this facility.</p>	<p>No change</p>

<p>We are concerned that 35 new dwellings will not be sufficient to finance a replacement library and community facilities with adequate parking.</p>	<p>The site allocation requires the "Retention, replacement or relocation of existing community uses, particularly the library/registry office". A scheme would only be permitted if the library was retained, replaced or relocated in line with this requirement. Surrey County Council manage the libraries in our borough and own the current library site, it would be for them to decide, in making any decision on this site and the management of the library, if a viable scheme could be achieved. The numbers are considered suitable, based on assessment of the site, constraints etc and considering viability as a broad level. The residential numbers are approximate, so SCC could argue a higher number if a suitable design can be achieved taking into account the site requirements</p>	<p>No change</p>
<p>Don't move the library to the edge of the town. No buses stop from Redhill, Court Lodge, at that part of Horley.</p>	<p>Surrey County Council manage the libraries in our borough and own the current library site, so they would have to provide a library this site or elsewhere if permission was to be given to redevelop this site. It is understood that the intention is to provide a new library in the new Russell Square development in the centre of Horley (See more details here - <a href="https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1">https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1</a> ) however as this has not been finalised yet we will retain in the policy the need to retain or relocate the existing library as we understand the importance of this facility.</p>	<p>No change</p>

<p>Build above the present Library and leave the car parking space to serve those visiting the library or the health centre.</p>	<p>Surrey County Council manage the libraries in our borough so they would have to provide this on this site or elsewhere if permission was to be given to this site. It is understood that the intention is to provide a new library in the new Russell Square development in the centre of Horley (See more details here - <a href="https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1">https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1</a> ) however as this has not been finalised yet we will retain in the policy the need to retain or relocate the existing library as we understand the importance of this facility.</p>	<p>No change</p>
<p>The library could become part of a community centre with meeting rooms, exhibition space to hire out and public toilets and possibly vending machines, supervised by Council staff with community volunteers.</p>	<p>Surrey County Council manage the libraries in our borough and own the current library site, it would be for them to decide how to deliver a library provision (although as per the policy we would expect library provision to be retained either on site or somewhere else).</p>	<p>No change</p>
<p>it seems that the council have already decided that it will be moved to a position were there won't be adequate parking.</p>	<p>Surrey County Council manage the libraries in our borough so they would have to provide this on this site or elsewhere if permission was to be given to this site. It is understood that the intention is to provide a new library in the new Russell Square development in the centre of Horley (See more details here - <a href="https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1">https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1</a> ) however as this has not been finalised yet we will retain in the policy the need to retain or relocate the existing library as we understand the importance of this facility.</p> <p>Any proposal would have to accord with parking standards set out in the adopted Local Plan 2005</p>	<p>No change</p>

<p>The idea of building on the car park behind the library that is used by several elderly and disabled people going to the GP surgeries is ridiculous.</p>	<p>The site allocation states that development would be required the:</p> <ul style="list-style-type: none"> <li>- Safeguarding of existing parking provision for adjoining community uses</li> <li>- Consideration of, and adequate provision for, residential parking needs</li> </ul> <p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. Policy TAP1 requires that if development would result in the loss of existing car parking spaces, a planning application must demonstrate that there is no need for these car parking spaces. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No change</p>
<p>Horley library is in a good position for most of its users. It is close to surgeries, chemists, dentist, post office, supermarket, retirements homes and bus stops. It seems that the change of location would see a fall in use, followed by closure.</p>	<p>Surrey County Council manage the libraries in our borough and own the current library site, it would be for them to decide how to deliver a library provision (although as per the policy we would expect library provision to be retained either on site or somewhere else).</p>	<p>No change</p>
<p>The SHLAA identifies the sites as HC10 as having the potential capacity for 35 dwellings and is developable in years 0-5. This density is reflected in the allocation. SCC own the 0.29ha site and are aware of the site assessments issues raised regarding surface water flooding. The DMP allocation also raises the issue of relocation or retention of the current library as a community use on the site. SCC and</p>	<p>Noted</p>	<p>No change</p>

<p>RBBC I are already in dialogue regarding actively identifying a replacement for the library site and welcome the opportunity to discuss this further with the Borough Council. This is both in relation to more detailed pre-application discussions, as well as the opportunities that may facilitate the site coming forward in the required timescales, in accordance with the 5 year land supply, as required by the CS.</p>		
<p>The library facility must either remain or move to a location of equal size to cope with a growing town. The library should not be moved to a smaller site if the town is growing - that is illogical.</p>	<p>Surrey County Council manage the libraries in our borough and own the current library site, it would be for them to decide how to deliver a library provision (although as per the policy we would expect library provision to be retained either on site or somewhere else).</p>	<p>No change</p>
<p>From the minutes of a SCC meeting held in May this year, it appears to be a 'done deal' and the inclusion of the proposal in the present 'consultation' is thus mere 'window dressing'.</p>	<p>Surrey County Council manage the libraries in our borough so they would have to provide this on this site or elsewhere if permission was to be given to redevelop this site. It is understood that the intention is to provide a new library in the new Russell Square development in the centre of Horley (See more details here - <a href="https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1">https://mycouncil.surreycc.gov.uk/documents/g4588/Printed%20minutes%20Tuesday%2024-May-2016%2014.00%20Cabinet.pdf?T=1</a> ) however as this has not been finalised yet we will retain in the policy the need to retain or relocate the existing library as we understand the importance of this facility.</p>	<p>No change</p>



<p>It would be good if this included some attractive outdoor seating and a grass area.</p>	<p>Policy DES1 states that development should provide street furniture and public art where it would enhance the public realm and/or reinforce a sense of place.</p>	<p>No change</p>
<p>no objections to this development site, subject to better provision for disabled parking bays for the two very busy surgeries. We note that the general parking provision is to be retained for the two adjoining healthcare centres, something which we would regard as essential, along with safe pedestrian access to both surgeries.</p>	<p>Wording has been updated to require "adequate disabled parking"</p>	<p>Wording has been updated to require "adequate disabled parking"</p>

<p>HOR6</p>		
<p>any design must allow for rear access for deliveries and not on Victoria Road as is the case now. Parking provision for all units needs to be on site. We have concerns regarding delivery lorries parking on a narrow one-way system and feel that there is a need for unloading bays.</p>	<p>The site allocation requires adequate access and servicing from Consort Way East.</p> <p>Parking would be required to be provided in line with parking standards which have been designed taking account of accessibility of development, the size of developments alongside an understanding of the local context of the borough. The policy also states that Development should not result in unacceptable levels of on-street parking demand in existing or new streets .</p>	<p>No change</p>

HOR7		
no objections to this development site based on the assumption that, with modern technology, a building of this size and location is no longer needed.	Noted - The telephone exchange is now identified as an opportunity area as it is not actively being promoted for development	No change
Sites such as the Telephone Exchange and Royal Mail need considerable scoping.	Noted - any site identified in the development management plan would still need to submit a planning application. The telephone exchange is now identified as an opportunity area as it is not actively being promoted for development	No change
There are very few leisure facilities in Horley – most residents travel to Crawley, which has much better provision than Horley. How about a cinema on the telephone exchange site?	Noted - The telephone exchange is now identified as an opportunity area as it is not actively being promoted for development. Reference to leisure uses has been included	No change
It would be good if this included some attractive outdoor seating and a grass area.	Policy DES1 states that development should provide street furniture and public art where it would enhance the public realm and/or reinforce a sense of place.	No change

HOR8		
We note that the proposed site includes Sangers House etc. for which residential redevelopment has already received approval. Any redevelopment needs to acknowledge that the pub part is a listed building.	The Sangers House part of the site has been removed from this site allocation given the recent planning approval. The site allocation recognises that sensitive design will be required to take account of the locally listed buildings, both in terms of Sangers House and the south part of the Chequers hotel building	No change

<p>The type of housing provision must be closely examined, and genuinely affordable housing needs to be a priority.</p>	<p>Proposed policy DES4 seeks to require a range of housing types and tenures on new developments.</p> <p>DES6 provides details on requirements on affordable housing which developers have to adhere to. Planning permission will only be granted for development if the scheme includes the right amount of affordable housing in line with policy, or if the developer can demonstrate that a scheme would not be viable should they have to provide affordable housing. If this is the case, we would still seek a lesser contribution on site or a financial contribution. Where a lesser/no contribution is allowed due to viability issues, we can include a requirement in the conditions of a planning permission that stipulates should the development make more profit than envisaged the Council would be able to "claw back" some of that money to go towards affordable housing.</p>	<p>No change</p>
<p>There needs to be detailed evaluation of the traffic impacts of such a development: the Chequers roundabout is yet another area major congestion, especially at peak times, when queuing traffic stretches right back along Horley Row.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that there is capacity. However, any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	<p>No change</p>

<p>Pleased to learn that the old part of the Chequers Hotel is listed and will remain, and pleased that the more recent extension will be developed. We cannot believe that The Chequers site is included for regeneration - this word tends to have a negative meaning. It is the most historic site in Horley and it would be vandalism to destroy it.</p>	<p>Noted - The Sangers House part of the site has been removed from this site allocation given the recent planning approval. The site allocation recognises that sensitive design will be required to take account of the locally listed buildings, both in terms of Sangers House and the south part of the Chequers hotel building. "Policy NHE7 - Heritage Assets" also requires that heritage assets (including locally listed buildings) are protected, and any harm to them or their setting must be suitably justified in line with national policy.</p>	<p>No change</p>
<p>Ensure that the listed elements are properly protected.</p>	<p>Noted - The Sangers House part of the site has been removed from this site allocation given the recent planning approval. The site allocation recognises that sensitive design will be required to take account of the locally listed buildings, both in terms of Sangers House and the south part of the Chequers hotel building. "Policy NHE7 - Heritage Assets" also requires that heritage assets (including locally listed buildings) are protected, and any harm to them or their setting must be suitably justified in line with national policy.</p>	<p>No change</p>

<p>NWH1</p>		
<p>Also detrimental affect to local countryside. Given the signifant increase in homes already agreed for this area I am concerned at the need to expand further into the countryside.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p>	<p>No change</p>

	<p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of land outside the urban area. The adopted Core Strategy identifies that the rural surrounds of Horley should be looked at before Green Belt. However, any land outside the urban areas will only be released should the Council no longer be able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The Council are proposing to put the Rural Surround of Horley into the Green Belt</p>	
<p>Local widening of the river corridor is essential to create a varied green ecological and recreational environment. There is a danger that the concept of the river corridor will be compromised by promoting too much development. Flooding concerns remain.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside and reflecting the River Mole Biodiversity Opportunity Area</li> <li>• Layout to ensure no development on land within</li> </ul>	<p>No change</p>

	<p>Flood Zones 2 and 3, with flood affected land safeguarded as public open space to link up the Riverside Green Chain and enable improvements to the Burstow Stream river corridor</p> <ul style="list-style-type: none"> <li>• Measures to manage and reduce surface water run-off including a comprehensive system of SUDs</li> <li>• New public open space along the river corridor as a continuation of the Riverside Green Chain and appropriate play facilities</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	
<p>Meath Green lane is narrow and totally unsuitable for additional traffic it already has considerable traffic peaks during rush hour due to congestion on the A217 and A23.</p>	<p>The site allocation has been updated to state:</p> <p>Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</p>	<p>The site allocation has been updated to state:</p> <p>Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</p>
<p>River Mole Biodiversity Opportunity Area</p>	<p>Noted - reference has been amended</p>	<p>No change</p>

<p>Object to the proposed allocation of Site NWH1 for reserve housing. It is reliant on the delivery of key infrastructure associated with the North West sector neighbourhood – infrastructure which, we understand, is the responsibility of a third-party landowner to deliver. It is clear that there is no certainty as to when the necessary infrastructure will be delivered. Therefore, in the context of the NPPF Paragraph 47 tests relating to housing supply, the site is neither ‘deliverable’ nor ‘developable’. The site also has a variety of physical constraints. Further feasibility work should be undertaken to ascertain whether the 75 dwelling capacity identified for the site in the DMP is realistic.</p>	<p>The North West sector is already being developed, and the infrastructure is a condition of the planning permission. As such, we are confident that the North West sector will be delivered. The site allocation recognises the constraints, including flooding, and requires appropriate mitigation. It is considered, given account has been taken of the site constraints, that the figure of 75 is an acceptable capacity.</p>	<p>No change</p>
<p>The county council’s transport development planning team has concerns about this site for the development of up to 75 dwellings. This section of Meath Green Lane is a narrow, winding, country lane, which is subject to a 40mph speed limit. There are no pedestrian, cycle or bus facilities along this section, and the lane often floods in this location. For these reasons, there should be no vehicular access at all from the site onto Meath Green Lane. Consideration must therefore be given to providing access to the site via the North West Sector access points/link roads.</p>	<p>The site allocation states:</p> <ul style="list-style-type: none"> <li>• Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</li> <li>• Upgrading of pedestrian/cycle routes, including FP410 which runs along the boundary of the site and</li> <li>• Measures to ensure development has appropriate access to proposed North West Sector bus routes and links into pedestrian/cycle routes to the planned neighbourhood centre</li> </ul>	<p>No change</p>

Your proposal to rezone the land on the above mentioned plan is not objected to. This is actually a logical move that removes a current anomaly whereby there is just a “protruding” section of land south of the Burstow Stream that is excluded from the development area. However, what is objected to is that it is illogical to not include all properties within this “protruding” section of land south of the Burstow Stream. Our property (Meath Green House) especially will effectively become sandwiched between development land. Therefore we request that our property (and we would also think The Coach House and Saxley Cottage) is also included in any rezone to ensure that there is balance to any proposed further development and consistency, rather than find separate developments occurring at later dates that are out of keeping. This will also give opportunity that land can be developed without necessarily impeding on the current road elevations of these properties because land can be accessed from current adjoining properties. Additionally there is also the matter that as shown on snip below in blue (shown more accurately on current development plans for the North West Sector) there is a section of land closest to the Burstow Stream that wouldn't be developable due to

Noted. It would be acceptable to include Meath Green House within the development area.

No change



<p>proximity to the stream so the actual amount of usable land is less than first appears.[Includes a drawing.] - REP 2587/3050</p>		
<p>We object to this proposal as it stands because of the vehicle accesses onto Meath Green Lane a highly dangerous and narrow road which must not be allowed to take any more traffic. If the accesses can be changed so that vehicular access is via the North-west Sector development, then it could be acceptable. Rat run prevention was a condition of the North East &amp; North West planning approvals, and this development should have a similar condition for the sake of consistency. We wish to be consulted at the Planning Application stage.</p>	<p>The site allocation states:  Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</p>	<p>The site allocation has been updated to state:  Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</p>
<p>supported, although it is considered that it would be beneficial for this site to be allocated as an urban extension rather than a reserved site. The owners have expressed a willingness for the land to be made available for self-build housing, bungalows or retirement/assisted living properties in the short-term in order to meet a need which is not otherwise provided for in the North West Sector. Either the whole of the site or a proportion of it in conjunction with market housing could be allocated specifically for</p>	<p>DMP Policy DES8 covers specialist accommodation including elderly accommodation. This supports the provision of elderly accommodation where it meets the criteria in the policy. Policy DES5 also requires that a variety of uses is provided on size, types and tenures of accommodation are provided on site. For more information on the DMPs approach to elderly accommodation, please see the evidence paper.  Number of ownerships is noted - this has been updated in the policy.  The conceptual materplan is for information only and</p>	<p>No change</p>

this. The latter would be in line with the Department for Communities and Local Government Ministerial Statement of 20 March 2015 titled, Housing Update - Providing more housing for older people and the subsequent press release of 21 March 2015, titled better homes and bungalows for Britain's older people. The NPPF at paragraphs 50 and 159 requires local planning authorities to plan for a mix of housing based on current and future populations, including older people. The Government is clear that it wants "...to see councils doing more, and thinking about building more bungalows and other types of homes to meet the needs of their older residents, so if someone does choose to move the properties are there for them to choose from." There is help available to support local planning authorities to identify the type of housing that is required, such as the Strategic Housing for Older People toolkit produced by the Housing Learning and Improvement Network and Association of Directors of Social Services. The Council's supporting paper "Housing for Older People 2016" identifies a need for additional sites to meet the future need of between 1,580-1,680 units (equivalent to 115 per annum over the plan period). Clearly the above would require a developer willing to deliver a specialist form

any scheme would have to investigate further the best design for the site. We would note that SCC have requested that access should not be from Meath Green Lane and as such the policy has been updated as follows:

- Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads to prevent rat running.

housing on the site and discussions have been held with developers in this regard. The constraints identified in the draft plan include flooding due to the proximity to the Burstow Stream; impact on listed buildings and archaeology; and the delivery of the north west sector.

Only the northern part of the proposed allocation adjoining the Burstow Stream is within the floodplain. The remainder of the site (3.3 ha) is developable and the land within the floodplain could be incorporated in the Riverside Green Chain and made publically available, also providing a buffer to the Green Belt beyond. This constraint is therefore more of an opportunity. The impact on the setting of listed buildings can be adequately incorporated within a development proposal, particularly a low density one. Any development proposal on this site would need to incorporate an archaeological assessment and methodology to be agreed with the Surrey Archaeological Unit.

The development of the North West Sector and delivery of the associated infrastructure has commenced and therefore this is less of a constraint. This site is outside of the Green Belt and therefore should rank higher than any Green Belt sites being considered for release.

<p>The plan states that the land is within 2 separate ownerships. Whilst most of the potential allocation is within 2 ownerships, there are in fact 3 separate owners. However we represent all of these land owners who have confirmed that the land is available for development. The conceptual masterplan is considered appropriate in terms of the density of development, proposed public space and access points onto Meath Green Lane.</p>		
<p>Local widening of the river corridor is essential to create a varied green ecological and recreational environment. There is a danger that the concept of the river corridor will be compromised by promoting too much development in close proximity to the river. There should be variations in width particularly where there are valuable local habitats. Flooding concerns remain where development is proposed. flooding issues must be taken into account as the Burstow Stream runs along the northern edge.</p> <p>This whole area is often underwater during the winter and the bridge is often cut off. Building so close to the edge of the flood plain will occupy the soak away area where excess water usually runs, and with the run off from the houses, the risk fo flooding to both new and established dwellings will be</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.</p> <p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside and reflecting the River Mole Biodiversity Opportunity Area</li> <li>• Layout to ensure no development on land within Flood Zones 2 and 3, with flood affected land safeguarded as public open space to link up the Riverside Green Chain and enable improvements to the Burstow Stream river corridor</li> </ul>	<p>No change</p>

<p>increased. It would be very foolhardy indeed to add to the already existing burden of extra housing on the flood plain area by building any amount of houses on this section.</p>	<ul style="list-style-type: none"> <li>• Measures to manage and reduce surface water run-off including a comprehensive system of SUDs</li> <li>• New public open space along the river corridor as a continuation of the Riverside Green Chain and appropriate play facilities</li> </ul> <p>Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "</p>	
<p>We have concerns about site access as there should be no access to Meath Green Lane and the North West Sector conditions should be fully respected.</p>	<p>The site allocation states:</p> <p>Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</p>	<p>No change</p>

<p>We are already seeing 'infill' housing developments emerging on greenfield sites to the north of Horley. Further ribbon development must be rejected, as it dilutes the identity of the town, becomes dormitory development without significant amenities, and does not guarantee provision of facilities within Horley - or indeed the rest of the borough.</p>	<p>National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for us to deliver the target there may need to be release of a small amount of land outside urban areas. This will only come forward if the Council can no longer demonstrate a 5 year housing supply.</p> <p>Reigate &amp; Banstead Borough Council have worked with Surrey County Council Transport Planners in order to understand the potential impact of all the proposals within the document. The findings are detailed in the Transport Assessment available on the Council's website. The Infrastructure Delivery Plan also sets out details on other infrastrucutre such as school and utilities etc. This has enabled specific requirements to be attached to proposed site allocations to ensure impacts are mitigated.</p>	<p>No change</p>
<p>Though housing to the South of Meath Green lane might be acceptable fill-in connecting with the new estate, the area to the North by Burstow Stream should be left as open land to connect to the GB.</p>	<p>An updated Strategic Flood Risk assessment has been undertaken by consultants, which provides details on surface water flooding issues on this site, identifying specific areas of flooding and issues concerned with this. Any development would need to take account of this in their site specific flood risk assessment which</p>	<p>No change</p>

sets out details such as what impact development may have and what would be done to mitigate any potential impacts, both for the site itself and the surrounding area.

The site allocation requires:

- Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside and reflecting the River Mole Biodiversity Opportunity Area
- Layout to ensure no development on land within Flood Zones 2 and 3, with flood affected land safeguarded as public open space to link up the Riverside Green Chain and enable improvements to the Burstow Stream river corridor
- Measures to manage and reduce surface water run-off including a comprehensive system of SUDs
- New public open space along the river corridor as a continuation of the Riverside Green Chain and appropriate play facilities

Policy CCF2 also states that "Proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. "

<p>Your policy has always been to prevent any extra access onto Meath Green Lane, unless it joins the two new estates via bus links. There should not be any access from any new development onto Meath Green Lane, so we don't see how any of these new houses on this section would be able to have external access to be joined onto the new estates, without entry onto Meath Green Lane. Meath Green Lane is already very congested and used as a rat run because of congestion on the A23 and A217. The lane, probable one of the only old country lanes left in Horley, regularly used by walkers, cyclists and horse riders, could become gridlocked.</p>	<p>The site allocation states:</p> <p>Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</p>	<p>The site allocation has been updated to state:</p> <p>Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</p>
<p><b>NWH1</b> - Concern is about any future traffic increase on Meath Green Lane which is already under considerable strain...it remains a narrow winding country lane... the bridge to the south over the Burstow Stream, and the Sal to the North are unsuitable for the type of HGVs that currently use the lane. The lane is used as a cut through during rush hours. The building of 600 houses is bound to generate many more vehicles and therefore would like assurance that traffic calming measures will be put in place to ensure traffic from the new estate will not be allowed to access the lane and will instead use the new link to the A217</p>	<p>The site allocation states:</p> <p>Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</p>	<p>The site allocation has been updated to state:</p> <p>Vehicular access should not be from Meath Green Lane, primary highway access is to be through the North West Sector access points/link roads where possible to prevent rat running.</p>



NWH2		
River Mole Biodiversity Opportunity Area	Noted - reference has been amended	Noted - reference has been amended
Reduced flooding should be used and between 75 and 100 houses	The number of homes is based on an area of 1.3ha, due to available flood modelling and the retention of the trees in the middle of the site. The number of approximately 40 new homes is considered appropriate	No change
This states that “safe highway access onto the A23 Bonehurst Road” would be required to support development on this site. However, the county council’s transport development planning team is not satisfied that safe or suitable access onto the A23 could be achieved. Traffic signals have recently been implemented at the Crossoak Lane junction to the north of the site, and the carriageway of Bonehurst Lane has been reduced from 3 lanes to 2 lanes to facilitate the implementation of pedestrian refuge islands, both as part of the Horley North East Sector development. This has led to increased queuing and delays along the A23. Access to the site is likely to necessitate the provision of either a right turn lane or a traffic signal junction on the A23, which would have a further impact on queuing and congestion on this	The developers have confirmed that due to land constraints, it is not possible to provide an access onto Avondale Close. Furthermore, access onto Horley Row via Avondale Close is likely to have a greater impact on the highway network than providing an access onto the A23 Bonehurst Road. They have undertaken some traffic modelling and consider that access onto the A23 Bonehurst Road can be provided via a signalised junction which can operate within its theoretical capacity and would provide additional pedestrian facilities across the A23 Bonehurst Road. This is something that would have to be demonstrated in more detail at a planning application stage.	No change

<p>heavily trafficked road. For these reasons, the county council's transport development planning team strongly advises that consideration is given to providing access via the existing residential roads to the west and/or south of the site.</p>		
<p>NWH2 - There is an inconsistency in the developable area/extent of Flood Zone 1 quoted in the DMP and the evidence base. This should be clarified so that the capacity of the site can more accurately be determined.</p>	<p>It is unclear where the inconsistency is but the Sustainable Urban Extensions (Stage 2) Site Specific Technical Report is very clear on how the capacity of the site has been calculated</p>	<p>No change</p>
<p>Local widening of the river corridor is essential to create a varied green ecological and recreational environment. There is a danger that the concept of the river corridor will be compromised by promoting too much development.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside and reflecting the River Mole Biodiversity Opportunity Area</li> <li>• Layout to ensure no development on land within Flood Zones 2 and 3, with flood affected land safeguarded as public open space to link up the Riverside Green Chain, enhancements to the river corridor and to incorporate additional flood storage to reduce downstream flood risk/highway flooding</li> <li>• Measures to manage and reduce surface water run-off including a comprehensive system of SUDs</li> <li>• Additional flood storage measures to reduce downstream flood risk and manage highway flooding</li> </ul>	<p>No change</p>

<p>Flood concerns at this site.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside and reflecting the River Mole Biodiversity Opportunity Area</li> <li>• Layout to ensure no development on land within Flood Zones 2 and 3, with flood affected land safeguarded as public open space to link up the Riverside Green Chain, enhancements to the river corridor and to incorporate additional flood storage to reduce downstream flood risk/highway flooding</li> <li>• Measures to manage and reduce surface water run-off including a comprehensive system of SUDs</li> <li>• Additional flood storage measures to reduce downstream flood risk and manage highway flooding</li> </ul>	<p>No change</p>
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<p>We are already seeing 'infill' housing developments emerging on greenfield sites to the north of Horley. Further ribbon development must be rejected, as it dilutes the identity of the town, becomes dormitory development without significant amenities, and does not guarantee provision of facilities within Horley - or indeed the rest of the borough.</p>	<p>This comment has been noted. National Planning Policy Paragraph 47, a Government level policy, requires local authorities to maintain delivery of a five-year supply of housing land in order to meet their housing target. Reigate &amp; Banstead Borough Council has an adopted housing target of 460 dwellings per year.</p> <p>The Council, as well as urban area site allocations in the DMP which will be delivered first, are preparing a brownfield register to encourage as much to come forward within the urban areas/on brownfield sites. However, in order for the Council to deliver the target there may need to be release of a small amount of land outside urban areas. This will only come forward if the Council can no longer demonstrate a 5 year housing supply.</p> <p>Reigate &amp; Banstead Borough Council have worked with Surrey County Council Transport Planners in order to understand the potential impact of all the proposals within the document. The findings are detailed in the Transport Assessment available on the Council's website. The Infrastructure Delivery Plan also sets out details on other infrastrucutre such as school and utilities etc. This has enabled specific requirements to be attached to proposed site allocations to ensure impacts are mitigated.</p>	<p>No change</p>
<p>no objections to this development site as a reserve site and we believe it should have priority over the Close/Haroldslea Drive site. The site will need considerable flood</p>	<p>Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.</p>	<p>No change</p>

mitigation measures due to the close proximity of the Burstow Stream.		
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SEH4		
We note this is a reserve site and, as such, we believe this should be allocated the lowest priority of all the sites earmarked in Horley.	Comment is noted. A phasing evidence paper is available on the Council's website which sets out the approach taken to phasing.	No change
Potential flooding issues and substantial flood mitigation measures will be needed; •	The whole of the site is within Flood zone 1, with only some very minor surface water flooding. Some of the site is already developed land including hard standing. National and local policy requires that sites over 1 ha demonstrate how they will not impact on flooding elsewhere and mitigate any potential impacts, both for the site itself and the surrounding area. Policy CCF2 also states that proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding.	No change

<p>There is poor access to a development which is off The Close, and backs on to Haroldslea Drive.</p>	<p>The site allocation requires:</p> <ul style="list-style-type: none"> <li>• Upgrading of highway access via The Close, including appropriate improvements to the junction with Balcombe Road</li> <li>• Improvement and extension of pedestrian footways on The Close and links to pedestrian/cycle facilities to Horley town centre</li> </ul>	<p>No change</p>
<p>We question why this has now been proposed by RBBC as the application by Rea Construction on Haroldslea Drive was originally refused but won by developers on appeal.</p>	<p>The Council challenged the Planning Inspector's decision through the High Court and were successful, with the appeal decision being quashed. The Judge agreed with the Council that the Inspector failed to have proper regard to the Development Plan and the ruling confirms the need for a plan-led approach to housing delivery where the Council can demonstrate a 5-year housing supply.</p>	<p>No change</p>
<p>Any development would require relocation of two businesses; a riding school and T&amp;M Transport. The riding school in particular provides a valuable community service as it offers Riding for the Disabled</p>	<p>The sites have been put forward for housing development by the land owners.</p>	<p>No change</p>
<p>Site would impact on the rural surrounds of Horley</p>	<p>The adopted Core Strategy identifies that the rural surrounds of Horley should be looked at before Green Belt. However, any land outside the urban areas will only be released should the Council no longer be able to demonstrate a five year land supply, i.e. once all other sources of housing have been brought forward. The Council are proposing to put the Rural Surround of Horley into the Green Belt</p>	<p>No change</p>

<p>As owners of part of this site my clients strongly support its allocation as a potential development site for medium density housing. The allocation is consistent with paragraph 6.8.9 of the Core Strategy which states: future expansion potential: the opportunity for some small scale sustainable urban extensions adjoining the Horley urban area has been identified. Development in this location will only be acceptable on sites allocated through the DMP, which will also establish the scale of development and phasing of individual sites. The detailed phasing of sites will take account of the need to provide site specific mitigation measures. The requirements to support the development of this site are all achievable and can be simply addressed as part of a planning application process.</p>	<p>Noted</p>	<p>No change</p>
<p>Also the surface water runs into the Haroldslea Stream which is not maintained and cannot cope with flood water, which already causes flooding in Haroldslea Drive, Haroldslea Close and Castle Drive. Any new building in this area will destroy green fields, which in turn increases flooding and global warming, as grass and trees capture CO2.</p>	<p>The whole of the site is within Flood zone 1, with only some very minor surface water flooding. Some of the site is already developed land including hard standing. National and local policy requires that sites over 1 ha demonstrate how they will not impact on flooding elsewhere and mitigate any potential impacts, both for the site itself and the surrounding area. Policy CCF2 also states that proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding. The updated Strategic Flood Risk Assessment carried out modelling on all development sites, including with regard to climate change allowances.</p>	<p>No change</p>

<p>The southern area of Horley is at risk of flooding and anything built in this area can only increase this risk. Developers can make the site itself safe from flooding, but they just transfer the problem elsewhere by doing so. Please stop building on the green spaces to the south of Horley.</p> <p>We are concerned about the knock on effect of flooding in the wider area. Can the council provide guarantees that the flood water will be handled appropriately with minimal impact to property and livelihood?</p> <p>We are sitting on a zone 2 flood area and the stream in The Close, floods over the road during winter rain. I have lived here for 20 years and for the past 10 years flooding has become a way of life. a couple of years ago, it took weeks to drain away as there was nowhere to pump it to.</p>	<p>The whole of the site is within Flood zone 1, with only some very minor surface water flooding. Some of the site is already developed land including hard standing. National and local policy requires that sites over 1 ha demonstrate how they will not impact on flooding elsewhere and mitigate any potential impacts, both for the site itself and the surrounding area. Policy CCF2 also states that proposals must not increase the level of risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding.</p>	<p>No change</p>
<p>With the Inholms Farm development plus a possible further 46 dwelling development behind 17 The Close there will already be a strain on utilities - There are inadequate local shops, recreation facilities, public transport, cycleway in this part of Horley.</p>	<p>Reigate &amp; Banstead Borough Council have worked with infrastructure providers in order to ascertain infrastructure needs, taking account of all proposed developments. These are detailed in the Infrastructure Delivery Plan on the Council's website. The Council has a Community Infrastructure Levy for new convenience retail and housing, this will help the Council deliver the required infrastructure.</p>	<p>No change</p>



<p>This would be a further erosion of the ever decreasing rural surrounds of Horley and Gatwick Open space.</p>	<p>The Council are proposing to put the Rural Surround of Horley into the Green Belt</p>	<p>No change</p>
<p>Haroldsea Road has seen a development of some 50-60 houses to the south and SEH4 sees up to 70 houses planned. I read with interest "improved pedestrian/cycle links to town."The access road has no room for 2 cars to pass let alone a pavement for children or young families.I understand housing needs to be built, but in the right environment.</p>	<p>A recent planning application for land at the Close illustrated that a suitable access scheme could be possible, for the beginning part of the road at least, but this would imply something suitable could be achieved all the way along. This would need to be demonstrated in more detail at the planning application stage in line with the site allocation requirement for: • Upgrading of highway access via The Close, including appropriate improvements to the junction with Balcombe Road</p>	<p>No change</p>
<p><b>SEH4</b> - further feasibility work is required as part of the DMP process to establish i) whether Site SEH4 is either 'developable' or 'deliverable' in the context of the NPPF Paragraph 47 tests; and ii) that the DMP's estimate on site capacity is realistic</p>	<p>The site has been actively promoted to us by the landowners and taking account of site context it is considered that SEH4 is developable and deliverable in the context of NPPF paragraph 47 tests and the proposed site capacity is realistic</p>	<p>No change</p>
<p>I have concerns regarding the proposed housing development by The Close, Horley - more traffic onto the already overcrowded and at times dangerous Balcombe Road.</p>	<p>A transport assessment has been undertaken for all proposed development across the borough, this indicates that this area is a hot spot and mitigation would likely be required. Any planning application on this site would have to demonstrate in further detail what the impact would be on the local road network and how this would be mitigated. This transport assessment also allows us to understand where potential mitigation/resources should be focused anyway, to inform the borough's Infrastructure Delivery Plan (IDP) and subsequent Community Infrastructure Levy (CIL).</p>	<p>No change</p>

SUGGESTED SITES		
<p>NWH2 - medium density residential development of between 32 and 64 units. The conceptual masterplan shows that much of the site is within the floodplain and access would be required through this- also records of historic flooding at the site. in a flood event future residential occupiers may become stranded. In line with the sequential test and principle 3 of the technical paper on urban extensions, development would be better located in an area less impacted by the floodplain. with the sequential test in mind, consideration should be given to the allocation of land further to the north on the western side of Bonehurst Road (SHLAA ref: SS02) and at Bonehurst Farm (SHLAA ref: SS22), notwithstanding the Green Belt designation. Considered in the SHLAA and has the access road to the North West Sector running through it from which access is reserved. In addition access is directly available from Bonehurst Road. The land should therefore have been considered suitable and shortlisted, particularly the land on the southern side of the new access road. The North West Sector development has already commenced with access to the A217 now having been constructed. The SHLAA Addendum 2016 confirms that these sites are available and that development is achievable. Development here could take place without future occupiers either being at risk from flooding. This land should be considered more suitable for development when compared against NWH2. potential capacity in excess of 600 houses. currently no public access to this land and any allocation would include accessible public open space. Any development here would be contiguous with North West Sector and could connect</p>	<p>The site capacity has been calculated allowing for housing only on Flood Zone 1. The updated Strategic Flood Risk Assessment Level 2 states that at the planning application stage, a site-specific flood risk assessment (considering all sources of flooding) and surface water drainage strategy will be required and safe access and egress should be demonstrated in the 1 in 100 plus climate change event.</p> <p>The site is not part of the broad areas of search set out in the Core Strategy. The site has been assessed with regard to safeguarding and it is considered to have high importance in preventing neighbouring towns from merging into one another and to assist in safeguarding the countryside from encroachment so is not considered appropriate for safeguarding.</p>	<p>No change</p>

<p>to the infrastructure serving it. land is immediately available and coupled with the available access points, size of the site and proximity to services it should be favourably considered for allocation.</p>		
<p><b>Proposed</b> - land to the south east of Horley (south of Smallfield Road) as a future Sustainable Urban Extension. The relevant land parcels are SEH7 (Land at Wilgers Farm), SEH8 (Land at Farney View Farm), SEH9 (Land east of Wilgers Farm) and SEH11 (Land at Harrowsley Green Farm). Together, the promoted sites are considered to represent an important strategic opportunity which is uniquely able to meet the future development needs of Horley and the wider sub-region. They can achieve an SUE for about 700 dwellings and associated public parkland and open space (collectively known as the Town Park), which would accord with the approach in the Core Strategy to securing the most sustainable form of growth.</p> <p>The representation comprises three parts:</p> <p>I. A Statement which sets out the position of L&amp;P on the question of the potential extension of the Green Belt.</p> <p>II. Smallfield Road, Horley Assessment of Green Belt – a report prepared by the Landscape Agency which reviews the promoted land parcels against the five key purposes of the Green Belt.</p> <p>III. Horley SUE, Technical Note – a report prepared by Mayer Brown which assesses the relative sustainability of the promoted land parcels in terms of movement and transport.</p>	<p>Given the uncertainty at this stage of being able to achieve a suitable flood alleviation scheme the Council can only go on current flood modelling, which has been informed by an updated Strategic Flood Risk Assessment, and would not support inclusion of this site in the DMP as a site allocation when other sites have been identified which would meet the Council's housing need.</p>	

<p>The reports address the content of the Regulation 18 stage Development Management Plan as well as its evidence base, namely the Green Belt Review (June 2016) and the Sustainable Urban Extensions (Stage 2) Site Specific Technical Report (June 2016).</p>		
<p><b>Proposed - 'Wilgers Farm Buildings and Land'</b> includes an existing courtyard of farm buildings which are locally listed, and an area of grassland, trees and vegetation to the east and south. The majority of the site is in Flood Zone 1. The existing farmhouse would be retained. Whilst no detailed architectural studies have been undertaken, it is anticipated that the conversion could deliver up to 4 dwellings. The size and configuration of the land to the east and south of the existing farm buildings provides flexibility to deliver houses of varying types and sizes. However, a review of existing housing along Silverlea Gardens suggests that a mix of detached and semi-detached two-storey dwellings houses may be most appropriate for this site. A planning application submitted in 2000 (withdrawn) included 9 detached dwellings on this part of the site. estimated that through conversion of the existing buildings and new-build development the site could accommodate up to circa 18 dwellings. Whilst this site could be allocated as one distinct parcel, there are clearly synergies with Site SEH7 and could reasonably be promoted jointly as one coherent development, with vehicular access and egress taken from Smallfield Road.</p> <ul style="list-style-type: none"> <li>• A sustainable location - A small-scale release of well-screened land adjoining the existing settlement, and providing a logical and complementary extension to the urban grain running east-west on Silverlea Gardens.</li> <li>• Low flood risk - Majority within Flood Zone 1, making this a sequentially-preferable site.</li> <li>•</li> </ul>	<p>Given the uncertainty at this stage of being able to achieve a suitable flood alleviation scheme the Council can only go on current flood modelling, which has been informed by an updated Strategic Flood Risk Assessment, and would not support inclusion of this site in the DMP as a site allocation when other sites have been identified which would meet the Council's housing need.</p>	

<p>Beneficial reuse of locally-listed buildings - • No physical constraints - We are not aware of any constraints which would otherwise prevent development on this site</p>		
<p><b>Proposed - Site SEH7 ('Land at Wilgers Farm')</b> - Due to the site's location adjacent to existing homes, and its close proximity to local services and facilities, redevelopment for housing would be an appropriate and logical alternative use for Site SEH7. Applying the same density ranges used to assess Sites NWH1, NWH2 and SEH4 in the DMP, development in Flood Zone 1 would generate an estimated site capacity of between circa 30 and 60 dwellings. It is understood that the flood zones modelled for Site SEH7 take into account a flood event in 1968. Through third party advice, (i.e. not commissioned directly by the landowner), we have been made aware that this particular event is unlikely to occur again due to the subsequent construction of the M23 motorway. The outcome could, we understand, be a reduction in the extent of Site SEH7 which is affected by Flood Zone 2 for town planning purposes, thereby increasing the site's potential development capacity. The landowner intends to commission work to investigate this further, and we would welcome the opportunity to share the findings with RBBC and the Environment Agency in due course. Open space would most appropriately be located to the north of the developable area, and would be commensurate in size with the housing development that it would serve. The principal means of vehicular access would be via Smallfield Road on the site's northern boundary. Unless the review of flood risk identifies the potential for a significant increase in the developable area of the site, it is envisaged that the housing development and supporting open space would not need to extend further east than the existing belt of mature trees which runs north-south</p>	<p>Given the uncertainty at this stage of being able to achieve a suitable flood alleviation scheme the Council can only go on current flood modelling, which has been informed by an updated Strategic Flood Risk Assessment, and would not support inclusion of this site in the DMP as a site allocation when other sites have been identified which would meet the Council's housing need.</p>	

<p>through the centre of Site SEH7.</p> <ul style="list-style-type: none"> <li>• Land uses to meet a local need – A housing-led development providing market housing, a planning-policy compliant quantum of affordable housing, with the opportunity to provide high-quality open space. A sustainable location, Low flood risk (Housing on Flood Zone 1, opportunity to provide open space and landscaping improvements on areas of the site within Flood Zones 2 and 3)</li> <li>• No detrimental landscape impact (The development would represent a logical ‘rounding off’ of the settlement). Housing would not breach the existing easternmost extent of the settlement, which is defined by Clifton Close and Furze Close (to the north of Smallfield Road). The mature tree belt running north-south through the centre of the site would create a new defensible settlement boundary. No physical constraints - We are not aware of any physical constraints which would otherwise prevent any of these uses being delivered on this site.</li> <li>• Available - The site is in single ownership and is being promoted by the landowner.</li> <li>• Deliverable - Vehicular access to the development can be taken directly from Smallfield Road. The DMP evidence base identifies there to be a ‘significant residual capacity’ in local water supply infrastructure before strategic reinforcements would be required.</li> </ul>		
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<p><b>Proposed - Site SEH9 ('Land east of Wilgers Farm')-</b> We understand that an engineering solution in respect of flood alleviation for the wider Rural Surrounds of south-east Horley is being considered by a local landowner, albeit this work, including engagement with the Environment Agency, is at a very early stage. In the event that a suitable and deliverable flood alleviation strategy can be agreed with the relevant authorities, Site SEH9 could come forward as part of a housing-led development alongside adjacent land to the south of Smallfield Road.</p> <p>Planning merits: In summary, the planning merits of Site SEH9 are as follows:</p> <ul style="list-style-type: none"> <li>• No physical constraints – With the exception of flood risk, we are not aware of any other physical constraints which would otherwise prevent development of this site.</li> <li>• Available – The site is in single ownership and is being promoted by the landowner.</li> <li>• Deliverable - Vehicular access and egress is achievable from Smallfield Road on the site's northern boundary.</li> </ul>	<p>Given the uncertainty at this stage of being able to achieve a suitable flood alleviation scheme the Council can only go on current flood modelling, which has been informed by an updated Strategic Flood Risk Assessment, and would not support inclusion of this site in the DMP as a site allocation when other sites have been identified which would meet the Council's housing need.</p>	
<p><b>Proposed - Legal and General site, Kingswood -</b> We note that the Legal and General site may be vacated and has recently been bought by a residential property developer.</p> <p>This 43-acre site has circa 275,000 sq. ft of office space and circa 1,500 car parking spaces. We understand that this is an existing site in the Green Belt. Therefore its redevelopment should reuse the existing built form. This could be utilised as a strategic commercial/industrial site as an alternative to the proposed Horley Business Park, if this is considered appropriate and sound – see our comments on supporting evidence – or as housing, utilising the current footprint of the development. For comparative purposes, the Cane Hill hospital site was redeveloped to provide 650 homes (77k sqm GIA) and around</p>	<p>Whilst the Legal &amp; General site has been promoted for housing development, it is not allocated within the Development Management Plan as it is not located within the areas of search outlined in the adopted Core Strategy.</p> <p>Focusing on these areas is a logical, methodical approach to identifying the most suitable locations for development, and one that has a broad base of evidence behind it from the Core Strategy process, and the Legal and General site does not fall within any of the areas of search. This is why it is not being put forward for allocation in the DMP. However, it will be</p>	

<p>7k sqm of commercial and business space .</p>	<p>considered as part of the Housing and Economic Land Availability Assessment</p> <p>Loss of employment would therefore run contrary to policy, however, there may be some potential under permitted development rights. The Legal &amp; General Site is a completely different offer to HOR9 (it is a largely rural, standalone, HQ style office, whereas HOR9 is proposed to be a high quality office development, close to Gatwick Airport in the heart of the Gatwick Diamond) loss of the site would therefore not indicate a lack of demand for office accommodation.</p> <p>The Local Economic Needs Update, Employment Opportunity Study and Chilmark Reports outline the 'need' for a strategic employment site. The Chilmark Reports also confirm that there is market demand for a strategic employment site.</p>	
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<p><b>PROPOSED SITE</b> - We acknowledge that a small site is allocated for potential housing development on Waterhouse Lane, Kingswood immediately adjacent the train Station. This site is earmarked for approximately 35 dwellings and is considered to have development potential within the short term (0-5 years).</p> <p>However, it is felt that the Council have not considered realistic alternatives properly and that other suitable, developable and sustainable sites have been overlooked in Kingswood, due to the Council's presumption of limited availability of suitable sites due to limited transport infrastructure in this location. <b>We therefore append to this letter of representation, a copy of details of two sites which we have duly submitted to the Council's SHLAA for consideration as strategic housing allocations, which comprise land and property at Legal and General's Kingswood Campus.</b></p> <p>As detailed within our accompanying letter, reference AM/mw/466 SHLAA, whilst these sites are located within the Green Belt, much of the land represents previously developed land, which it is considered can be redeveloped with a lesser impact upon the character of the Green Belt than the existing built form.</p> <p>Furthermore, the use of the site for residential as opposed to employment purposes is likely to result in far less noise, disturbance and cumulative highways impacts than the existing use. Due to a long lease on Legal and General House, the site would be available for development within the medium to long term 6-15 years, and would therefore address residual and future housing growth requirements within the borough, following the development of the smaller site adjacent Kingswood Station.</p>	<p>Comment is noted. However, the site is not proposed to be allocated within the Development Management Plan as it is not located within the areas of search outlined in the adopted Core Strategy.</p> <p>Focusing on these areas is a logical, methodical approach to identifying the most suitable locations for development, and one that has a broad base of evidence behind it from the Core Strategy process, and the Legal and General site does not fall within any of the areas of search. This is why it is not being put forward for allocation in the DMP. However, it will be considered as part of the Housing and Economic Land Availability Assessment</p> <p>However, it is recognised that there may be some potential under permitted development rights.</p>	
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<p><b>Proposed site - Newstead Hall, Haroldslea Drive, Horley -</b> owners object to the conclusions of the document regarding proposed site allocations as it is considered this is based on erroneous information regarding the above site.</p> <p>Urban Extension Technical Report - in effect a sieve process to facilitate a 'traffic light' assessment of sites to define those that may go forward as candidate sites for selection as development sites, and those that are extinguished from the process. The selection process was a fairly coarse sieve process and in pursuing this it is considered that the Council have failed in their legal duty to secure a sustainable development pattern.</p> <p><b>Flood Risk</b> - An FRA has been carried out for the site. The EA data defines the site as being within Flood Zone 1, at low risk of fluvial and tidal flooding therefore flood risk should not be a constraint on the development of this site. This FRA has shown flood risk is not a constraint in achieving planning approval for the proposed development with surface water SuDS being accommodated using reasonable engineering to give security of delivery.</p> <p><b>Tree Protection</b> - A tree survey has been carried out and concludes that during the survey the majority of trees and groups on site were identified as low quality (Category C) (61 in total). However 45 trees/groups were identified as moderate quality (Category B) with 5 as high quality (Category A) and 4 as Category U (considered unsuitable for retention in the sites current context). Some trees were identified during the survey to have major structural or physiological defects. The density and location of the existing trees in the site have the potential to represent significant constraints to a proposed development.</p>		
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However, it is considered likely that impact to any retained trees can be kept to a minimum through carefully thought-out design and with input from the project arboriculturist.

**Access** - access is wholly achievable within the legal controls available to the owners.

The owners are content for the site to be developed for custom built housing if the Authority considers this will assist in meeting its duties in this regard.

In preparing the Development Plan the Council is obliged under law to secure a pattern of development that is sustainable. The Core Strategy already requires that small scale extensions to the urban area have precedence over Green Belt releases. National Planning Policy sets out the meaning of sustainable development, and this excludes Green Belt unless there is demonstrable sustainability advantages over other land releases. In this context and the context of the foregoing and documentation accompanying this email it is submitted that the release of site HE09 would be wholly in accordance with the duty to secure sustainable development patterns, and further that an omission to include it in favour of Green Belt releases would amount to a breach of the Council's statutory duty.

<p><b>PROPOSED SITE - SSW5 Land south of Slipshatch Road</b></p> <p>No onerous conditions or impediments have been identified with regards impacts on heritage, landscape, biodiversity, flood risk, environmental health and amenity to prevent the site being developed.</p> <p>The overall score of 5 in its conclusion is not sound judgement given that the shortlisted site of SSW2 scores 3. Specifically, with regards to checking urban sprawl and safeguarding the countryside both sites SSW2 and SSW5 should accord the same judgement (lower importance – Urban Sprawl and moderate importance – safeguarding the countryside).</p>	<p>SSW2 is more contained with stronger boundaries, and by virtue of there being some built form on the site and a stronger relationship with the surrounding built form, this site is considered to rank lower than SSW5 for both purposes. As such we will continue with the ratings that were given in the Green Belt reievw for these purposes.</p>	
<p><b>Proposed sites - Horley</b> We would wish to discuss with RBBC reasons why the following HTC proposals were not considered:  Former Phillips site on Bonehurst Road;  Field on Bonehurst Road between Cambridge caravan site and Lawson's Timber Yard;  Bridge Industrial Estate;  Area on Smallfield Road currently earmarked for possible town park which is likely to be provided at another site</p>	<p>Former Philips site - The landowner has confirmed that they have no intention of putting this site forward for housing, it is required for future commercial expansion.</p> <p>Fileld on bonehurst - This forms part of SHLAA site SS22. This has previously been concluded as not being suitable for housing development due to Green Belt impact and therefore not deliverable or developable. It is also not within the Core Strategy area of search</p> <p>Bridge industrial estate - We are not able to include this in the DMP as national policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the</p>	

	<p>site is available and could be viably developed at the point envisaged. The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply</p>	
<p>The area of search included south west Reigate and specifically site SSW6 which is owned by RGS save for the triangular parcel of land in the north/north east corner of the site, and the field to the west. The eastern half of SSW6 owned by RGS is known as North Field.</p> <p>RGS support the Council’s proposal to remove from the Green Belt the narrow triangle of land to the rear of existing residential properties. However it is not clear if this site can be developed in isolation. Furthermore, it is noted that the Council propose to remove land comprising the former Hartswood Nursery from the Green Belt. Whilst these sites abut one another our initial review would suggest that they could not be physically linked and therefore the potential to optimise the development potential, for shared access, infrastructure, etc. would not be delivered. In order to provide a more logical “rounded off” development site and to facilitate the combined development it is proposed to release a parcel of land from the Green Belt which would provide a rectangular parcel of land which extends to approximately 1.2 ha (3 acres). It would be contiguous with both the former Hartswood Nursery site and the land to rear of Castle Drive which the Council is proposing to release</p> <p>Whilst the site forms part of the Hartswood playing fields it is not regularly used as sports pitch and it is considered that it is surplus to the School’s requirements. The site is flat, featureless</p>	<p>The majority of the parcel is unsuitable for housing, being constrained by existing use as sports field and large areas of flood risk. The constraints outweigh the identified need for residential development which could be provided on alternative land. Further information on this site can be found in the Sustainable Urban Extensions (Stage 2) Site Specific Technical Paper - the full site is ref: SSW6.</p> <p>The area to the west of Reigate along the A25 has outright constraints, such as common land.</p>	

<p>and immediately adjoins existing housing development.</p> <p>The northern boundary of the site is defined by a strong tree and hedge line beyond which lies arable land. The eastern boundary of the site is defined by the residential curtilage of properties in Castle Drive which form a strong defensible boundary and the southern boundary is defined by a road which provides vehicular access to the car park serving Hartswood sports ground and residential properties beyond.</p> <p>It is considered that the subject site would represent a natural westward continuation of the built up area and redevelopment of the site and would relate well to the existing built up area and would have limited impact on the Green Belt</p> <p>A substantial landscaped buffer could be formed along the western boundary to ensure that the development would benefit from a strong readily recognisable and defensible boundary.</p> <p>We note that the purpose of the Green Belt Review had been undertaken in accordance with Core Strategy Policy CS3 and it is intended to inform future site allocations and amendments to the Green Belt boundary on the Policies Map.</p> <p>The consequence of releasing the site from the Green Belt would be insignificant in the overall proportion of the district that is designated as Green Belt. Release the site from the Green Belt to allow for future residential development would release pressure on the Green Belt elsewhere which will assist in meeting the purposes of the Green Belt.</p> <p>The justification for the removal from the site from the Green Belt having regard to the objectives of the Green Belt as defined in the NPPF are considered below:</p> <ul style="list-style-type: none"> <li>· Objective 1: to prevent urban sprawl – the site adjoins the curtilage of the developed area of Castle Drive and it will therefore not result in urban sprawl;</li> <li>· Objective 2: To prevent neighbouring towns merging into one</li> </ul>		
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<p>another. The site lies between the main settlement of Reigate to the north and smaller settlements of Betchworth/Brooklands to the south. Removal of sites from the Green Belt would have no discernible impact on the separation distances between the two settlements. There will be no prospect of merging of the built area as a result of the proposed amendment to the Green Belt boundary;</p> <ul style="list-style-type: none"> <li>· Objective 3: to safeguard encroachment on the countryside – there will be no material encroachment on the surrounding countryside;</li> <li>· Objective 4: to preserve the sitting of the special character of historic towns – there are no historic settlements in the vicinity of the site that would impact on the sitting of any historic town;</li> <li>· Objective 5: to assist regeneration, encouraging the recycling of derelict and other urban land</li> </ul> <p>In terms of flood risk it should be noted that the site is sequentially preferable and lies within Flood Zone 1. With regard to access there are no constraints in terms of facilitating access to the site and direct access could be achieved from Castle Drive.</p> <p>It should be noted that the site is available and there are no physical, ownership or environmental constraints in relation to developing the site for housing in the future.</p>		
<p><b>Proposed site</b> - There should be a clearer presumption in favour of logical urban extensions where it can be demonstrated that they are sustainable in edge of settlement locations in the countryside as opposed to the Green Belt. In this regard it is submitted that <b>Land at 17 The Close, Horley</b> should be one of these urban extensions. Your Council have accepted that the site is located in a sustainable location.</p>	<p>It is considered that given the sites location within the Gatwick Airport Open setting Virtue of narrow access point into the site is still pertinent - check SCC response</p>	

<p><b>PROPOSED SITE - land at Beechen Lane</b> - Our client, the Diocese of Southwark, has a potential development site in a highly sustainable location, which in our view should be allocated for development as required by objective PS3 and in accordance with Policy CS8 of the Core Strategy 2014, which looks to deliver “at least” 815 homes in unidentified urban locations. The client’s proposed site, has a developable area of approximately 15 acres (6 hectares) and could deliver in the region of 200 dwellings.</p> <p>The site is located between Kingswood and Lower Kingswood, immediately adjacent to existing residential development and within walking distance of the comprehensive facilities of both towns. The site is accessed from Chipstead Lane, and currently comprises scrub woodland in the north and pasture land used at present as a pony paddock. It is within the Green Belt, and an Area of Great Landscape value. The site is on the very edge of the Area of Great Landscape value, however is enclosed by ancient woodland to the east, which the Area of Great Landscape Value extends beyond, and therefore cannot be argued as being a key parcel of land within the area.</p> <p>It is our view that this parcel of land does not fulfil the five purposes of the Green Belt as set out in the NPPF and therefore development should not be resisted on this basis. Due to the extent of the site’s unsuitability for being allocated as Green Belt land, it is our view that this area should be removed from the Green Belt. This conclusion has been reached following review of the Council’s Green Belt Review 2016, and undertaking an assessment of the site on this basis. Using the Council’s own methodology it can be concluded that the site is not suitable Green Belt land. This assessment undertaken is below - <b>SEE REPS FOR ASSESSMENT</b></p>	<p>The adopted Core Strategy required that we looked at potential sustainable urban extensions in the areas of search agreed through the Core Strategy process. This land referred to is not located within the broad areas of search. See the Sustainable Urban Extensions Technical paper stage 1 and 2 for further information.</p>	
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<p>The site was found to be of lower importance to the Green Belt in respect of each of the five purposes. Indeed, it is our view that the site is entirely unsuitable for Green Belt designation under National Policy and should be released. The site should be allocated for development in accordance with Objective PS3 of the emerging Development Management Plan and Policy CS8 of the Core Strategy 2014.</p>		
<p><b>Proposed site</b> - Extension of rear of shop buildings - Some expansion of buildings on the south side of Station Road East is currently underway. These units should be reflected as 'planned' in the DMP. Additional units to complete this rear streetscape could continue towards east end of Station Road East.</p> <p>A small number of units may also be provided in other locations around Redhill and in the other town centres. For example we not there is space to the rear of retail frontages in Bell Street, Reigate, that could be provided, with increased height, in a manner that does not affect the frontage or appearance of the street scene.</p>	<p>It is unclear where the units referred to are but a 'planned' concept is not something that is necessary in the DMP. Where scheme would come forward then these would be supported by planning policy as appropriate.</p>	
<p><b>Proposed site</b> - Redstone Hill. There is a derelict house of some significant size half way down Redstone Hill (travelling north to Redhill). It has been vacant for many years. I believe that to date plans have been submitted but rejected (possibly due to access?). This site would be worth including in the development proposal. Note: if access for this site was an issue with previous planning, then it would support concerns raised above regarding access further along the A25</p>	<p>This site has planning permission for Demolition of existing building and erection of a replacement building comprising 13 apartments and related parking. (REF: 15/00556/F ). We cannot force landowners to build out planning permissions</p>	

<p><b>Proposed site</b> - Site between the southbound railway line and eastbound railway (south of Redhill train station) could provide potential for development in a very central location. Access from Rydens Way or Brook road.</p>	<p>We are not able to include this in the DMP as national policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply.</p>	
<p><b>NWH1/Proposed site</b> - A favourable site for development is the land surrounded by Axes Lane and New House Land comprises a 6.25 hectare parcel of grazing land to the south of Axes Lane and east of New House Lane, which is double in size than the site proposed at Meath Green Lane thus being able to accommodate a higher number of residential units or future expansion. Although a Sustainable Urban Extensions Technical Report would be necessary to further confirm its suitability, the obvious advantages of the suggested site, include: a) Its excellent road transport links, as it is sandwiched between the M23 and A23; b) Its proximity to Salfords railway station, as it will take advantage of existing underused infrastructure thus leaving Horley station unaffected by any potential increase of the commuters as a consequence of the new housing; c) The presence of housing at each corner of the site, the substantial dwelling known as Axeland Park midway along the northern boundary and the extensive residential frontage to New House Lane from the southwest corner of the site would not render new development in this location as unduly conspicuous. Assimilation would be further assisted by the mature planting along boundaries which it should be possible to</p>	<p>The adopted Core Strategy required that we looked at potential sustainable urban extensions in the areas of search agreed through the Core Strategy process. This land referred to is not located within the broad areas of search. See the Sustainable Urban Extensions Technical paper stage 1 and 2 for further information.</p> <p>In addition, the area has a blanket tree preservation order on it.</p>	

<p>retain in the majority. Moreover, it will be noted that the site is bounded by existing highways on two sites providing strongly defined boundaries to development; d) Development at the site would not be viewed as 'encroachment' in the countryside. The site is of a sufficient size to provide for each own infrastructure requirements together with appropriate improvements to site accessibility and, as appropriate, make its contribution to community facilities and affordable housing provision; e) The land is private and not used for agricultural purposes; f) The site has an extensive frontage to Axes Lane, a high quality carriageway providing ready access to Salfords station; g) The site is within Green Belt, a designation covering 80% of the Borough, but there are no other evident environmental constraints upon development of the site. The site and surrounding area is not regarded as high quality landscape nor ecologically sensitive and most importantly it is not within a flood plain; h) The allocation of the site for housing and its removal from the Green Belt will not undermine the purpose of the Green Belt in the context of housing need and in consideration of the site's advantages. Axes Lane and New House Lane would remain as strong and defined boundaries to the development.</p>		
<p>In my view land already in Council ownership south of Dovers Green School and to the east of Lonesome Lane, and also overgrown/derelict land to the east of that parcel (lying between Earlswood Brook and the A2044 Woodhatch Road, should be developed in preference to Green Belt land that is still in productive agricultural use such as that bounded by Whitehall Lane and Slipshatch Road. However, I would accept that this latter area might need to be considered for rezoning in the more distant future if pressure for further housing continues unabated - but only once Green Belt land that is not being properly farmed has been made available for development.</p>	<p>The adopted Core Strategy required that we looked at potential sustainable urban extensions in the areas of search agreed through the Core Strategy process. This land referred to is not located within the broad areas of search. See the Sustainable Urban Extensions Technical paper stage 1 and 2 for further information</p>	

<p><b>Proposed site - Land adjacent to Holly Hill, Banstead</b> This site is suitable for elderly accommodation, and this should be reflected in a specific site allocation and land use designation. A draft site allocation document is enclosed with these representations.</p> <p>Furthermore, all of the shortlisted land parcels outlined in the Sustainable Urban Extensions (Stage 2) evidence base document are located within the Metropolitan Green Belt and all are located in the south of the borough. The site South of Holly Hill, Banstead is also within the Green Belt and is contiguous to the Banstead settlement boundary, but is better suited for release to provide residential accommodation for older people because of its proximity to a larger settlement boundary and because historically it was intended to be part of the settlement. It is also better suited than site BAN4 which is being released from the Green Belt</p> <p>Therefore, the site at Holly Hill would represent a sustainable urban extension to Banstead and could contribute towards the overall and specialist housing need in the borough that is presently identified but ignored. The site has been included in the 2016 SHLAA Addendum (BV15) and is identified as being available and achievable but not currently suitable as it would require a strategic policy change. It should be considered for Green Belt release now for release for specialist housing and included within the sustainable urban extensions evidence base document. Policy MLS1 should be drafted to recognise the importance and sustainability benefits of sites which are physically contiguous with built up areas, and should be prioritised accordingly wherever they may be</p>	<p>The site does not lie within a location contemplated for housing development through Policy CS6 of the Core Strategy and as such would not accord with our adopted Core Strategy</p>	
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<p>Alternative development sites;</p> <ol style="list-style-type: none"> <li>1. around East Surrey Hospital towards Whitebushes</li> <li>2. Sidlow Bridge south of Reigate, on the roads heading towards Leigh</li> </ol> <p>Given the number and size of Urban Open Spaces in Reigate compared to Redhill, it would seem that Reigate could accommodate additional housing with less impact than Redhill, although infrastructure such as houses and medical centres would still be needed.</p> <p>As such sites such as SSW2 and other areas of land in this area would seem better options.</p>	<p>Without any more detailed site location it is hard to comment on the suggestions, however the land around these areas is covered by a number of designations such as Green Belt, Site of Nature conservation importance, flood zone.</p>	
<p><b>Other sites</b> - the existing Holly Lodge Mobile Home Park is in a sustainable location within walking distance of the community and retail facilities at Lower Kingswood with a bus stop outside the park to take residents farther afield. The existing Home Park is designated within the Green Belt and therefore considered compatible within that designation. Therefore, the provision of park homes as an extension to the home park would be consistent with the Core Strategy and sustainability principles. Adopted Core Strategy Policy CS8 states that 815 homes will be delivered through windfalls and other broad urban locations in areas including Area 1: The North Downs. An extension of Holly Lodge Mobile Home Park would address that requirement where otherwise allocations will be difficult where most areas are either already developed or designated as Area of Outstanding Natural Beauty or Area of Great Landscape Value. An extension to Holly Lodge on land to the west and north of the existing park home estate could accommodate up to 150 residential caravans that could meet the needs of older people in an enhanced retirement village that addresses the Council’s legal duty to address the housing needs of those seeking to reside in caravans, that accords with policies CS3, CS8 and CS14 of the Core Strategy and in accords with paragraph 49, 50 and 55 of the NPPF and</p>	<p>The site does not lie within a location contemplated for housing development through Policy CS6 of the Core Strategy and as such would not accord with our adopted Core Strategy</p>	

<p>recent guidance in the jpg advising on the need to provide single-storey homes for older people. The existing park home estate is already within the Green Belt and therefore must be considered appropriate in that context. A controlled and designated expansion of the park home estate as a retirement village with the Green Belt designation retained, could equally be considered appropriate (caravans are not buildings by legal definition) and could be subject to a special development management policy to control the layout and extent of expansion, restrict occupation to over 50 year olds, secure a community centre with health visitor facilities, retain the general principles of the Green Belt designation in a well screened parkland environment and prevent mainstream housing development.</p>		
<p><b>PROPOSED SITE</b> - Land at Sandy Lane, proposed for a retirement village</p> <p><b>SEE REPS FOR FULL INFORMATION</b></p>	<p>It is accepted that there is an element of need for elderly accommodation, particularly for Extra Care. However, as set out in the “Development Management Plan (Regulation 18) evidence paper, Housing for Older People”, elderly people accommodation needs are varied (some may stay in their homes and bring in care, some may go live with relatives etc). As such, we are taking a varied approach to facilitating elderly persons accommodation needs through the Local Plan given the range of options to older persons housing needs.</p> <p>We are proposing a policy specifically for elderly persons accommodation in the Development Management Plan, which will support new elderly</p>	

	<p>person provision in appropriate locations and resist the loss of existing. We are also proposing a policy which will require a certain percentage of housing for certain developments to be accessible and adaptable, as well as adaptable for wheelchair users. In addition, there are a number of proposed site allocations in the document which include a requirement for elderly provision. Other policies on housing mix also seek to ensure there are the right types of housing being provided, including smaller units which can encourage downsizing.</p> <p>The aforementioned evidence paper goes on to summarise that “it is not appropriate or necessary to include borough-wide targets for provision of new accommodation” so our approach is not about hitting a numerical target for elderly persons accommodation but rather facilitating a broad range of options.</p> <p>Given all of the above, whilst we are supporting the development of extra care in the right locations, the provision of extra care in itself is unlikely to be enough to demonstrate special circumstances required to justify harm to the Green Belt.</p>	
<p><b>Proposed site - Patteson Court</b> - I own a company who in turn owns a site called Patteson Court, Nutfield Road, Redhill, Surrey, RH1 4ED, the site has offices suitable for conversion and also large car parks that could be used to develop houses, I would like to put the site forward for potential inclusion within your Development Plan, it has good / current access, housing either side, and is available to develop. It would mean we would look to move staff (up to 100) into a city centre site, therefore</p>	<p>The site has been assessed but is not considered suitable for removal from the Green Belt. Conversion may be applicable, subject to demonstration that the site was no longer required for commercial use as well as other policies considerations. Once adopted, proposed policy NHE6 of the DMP would apply, currently policy CO3 would apply from the Borough Local Plan 2005</p>	

<p>reducing the number of vehicles in the area. I have attached an outline of the site for you to look at. I am sorry this has been put forward so late in the consultation period. If you need any further information please do not hesitate to contact me using the details below. I would be grateful if you could confirm you received this request in time for the close of consultation.</p>		
<p><b>Proposed site</b> - in future local plans, would like land at <b>Drakes Field, Rectory Lane</b> to be considered. Note that there is an allocation for redevelopment of the shops opposite this site and would be willing to cooperate with the above development should any of Drakes Field be required for road widening, pavements, parking or amenity space.</p>	<p>Comment is noted. This field forms part of the strategic gap between Reigate &amp; Banstead and the London Borough of Croydon</p>	
<p><b>Reigate</b> - Please can you advise why the area west to Hartswood nursery was deemed 'unsuitable' for development? (Page 158). Why is there no development planned west of Reigate along the A25?</p>	<p>The majority of the parcel is unsuitable for housing, being constrained by existing use as sports field and large areas of flood risk. The constraints outweigh the identified need for residential development which could be provided on alternative land. Further information on this site can be found in the Sustainable Urban Extensions (Stage 2) Site Specific Technical Paper - the full site is ref: SSW6.</p> <p>The area to the west of Reigate along the A25 has outright constraints, such as common land.</p>	
<p>One undeveloped brownfield area that should be considered for development is the redundant/derelict sandpit area bounded by Cockshot Hill, Park Lane East and Priory Drive. I can see that this land will not appeal to developers due to higher construction costs than in greenfield areas, but with the current level of market values of housing in Reigate it must surely be possible to steer some residential development into that area?</p>	<p>This is a regionally important geological area and is also designated as urban open space, as such would not be suitable for development</p>	



<p>Identifying possible urban sites for housing:</p> <p>The land by Halfords on the A23, which was the site of the old Mercedes Garage</p> <p>Gloucester Road car park</p>	<p>National policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.</p> <p>Mercedes Garage- The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply. Planning permission (15/02486/CU) and certificate of lawfulness (proposed use) (16/00210/CLP) granted for the sale of furnishings, homeware and household goods. The site is within a designated retail warehouse area – a designation that is proposed to be continued in the Development Management Plan.</p> <p>Gloucester Road Car Park - this is included in the DMP as a site allocation</p>	
<p>Replacement of estate parking with undercroft parking and flats or townhouses above - Suitable sites could exist in many different locations across the borough. An example of what this could entail is at Romanby Court, Mill Street Redhill (30 units).</p>	<p>It would not be reasonable to require undercroft parking as a rule as this could make development unviable. However, this option will be encouraged in a supplementary planning document on parking design. The DMP does include some car parks such as Gloucester Road Car Park and Horley car park.</p>	
<p><b>Proposed - Former Territorial Army site, Batts Hill, Redhill -</b> This site has been vacated, and the Ministry of Defence's disposal report from December 2014 clearly identifies the Expected Planning Use as Housing. Yet it does not appear in the SHLAA. Based on an estimated 0.6 ha size we estimate this</p>	<p>We are not able to include this in the DMP as national policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the site is available and</p>	

could accommodate 35-40 residential units.	could be viably developed at the point envisaged. The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply.	
<b>Proposed site - Buckland Lane</b> - Buckland Lane which is little used and in Mole Vallay is now impassable has a cottage on a small plot of land on the East side about 1/4 mile in. I suggest that a couple of small houses could be placed alongside without impinging on anyone and would probably be very useful for local employers	Buckland Lane is located within an Area of Outstanding Natural Beauty. The site is also not within the urban area and therefore does not lie within an area contemplated for housing development through Policy CS4. The site has poor access to local services, facilities and public transport. Part of the site has been identified as potentially being at risk of surface water flooding	
<b>PROPOSED SITE</b> - Church Lane, Hooley, CR5 3RD Our client wishes to put forward the land at Church Lane, Hooley, see enclosed, as a potential site allocation and seek its removal from the Green Belt. The site extends to 0.1 ha and it is our view that the site has potential for at least 1 dwelling. Our client would be willing to consider all or part of this site as a potential self-build allocation.	Only sites capable of 5 or more units are looked at as part of the DMP.	
<b>Proposed - North of Brook Road</b> - We support the current uses of this site but there could be potential to develop this site to retain the current uses while adding low-cost live work units with affordable residential accommodation by extending the height of development in this area.	We are not able to include this in the DMP as national policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply. The site is also within the flood zone so would	

	not be sequentially preferable	
<b>Proposed site</b> - Why not reuse the existing school in Alexander Rd as a Primary School. Refurbish or rebuild?	Reigate & Banstead do not deliver schools in the borough, this is largely the remit of Surrey County Council. The DMPs remit is to engage with providers to ensure that future growth is on their agendas and to safeguard land for identified needs. The landowner has not responded to our requests for confirmation on intentions so we do not know what intentions are for it.	
A slip road off the M23 to enable easier access to the East Surrey Hospital would be an advantage	Noted	
<b>Suggestion - West Central, 3 London Road</b> - The rear of West Central is only one storey high while the main building is three storeys. The rear of this building is in a courtyard area that includes Nobel House, which is significantly higher. It could support a development combining community use (which is lacking in the Redhill town centre plans) on the ground floor and an estimated 15 dwellings above.	We are not able to include this in the DMP as national policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply.	
<b>Proposed SUE - LAND AT SHRIMPSFIELD, CHIPSTEAD LANE, LOWER KINGSWOOD:</b> The site is approximately 5 hectares. It is a vacant field with some overgrown vegetation * South Eastern boundary of the site abuts Chipstead Lane and Sandy Lane to the South. * Access to the site can be from Chipstead Lane thus retaining the wooded area to the A217, with the potential for enhancement and wooded area to the north. * It is important to note that the site whilst being within the Green Belt the site is neither in ANOB or AGLV.	As set out in the Sustainable Urban Extensions Technical Paper (Stage 2), available on the Council's website, the Core Strategy identifies (in policies CS6; CS8) three 'broad areas of search' for sustainable urban extensions as follows:  a. Countryside beyond the Green Belt adjoining the urban area of Horley: up to 200 dwellings b. East of Redhill and east of Merstham : up to 500-700 dwellings	

<p>The adopted Core Strategy set a target of 460 dwellings per year. This target was however substantially below the Objectively assessed need (OAN). The Council's 5 year housing supply document for up to April 2016 seeks to demonstrate that the 5 year supply is met and for that matter exceeded. This is however not accepted. Having analysed the Borough Council's housing supply figures and supporting information it is submitted that the assessed supply has been over estimated and that a figure of 4.66 years is more robust as opposed to the 5.83 years suggested by the Borough Council. In a number of sites relied upon to reach 5.83 years the projects have either stalled and supply will be reduced or are at a too early stage in the process i.e. pre planning to be relied upon. Furthermore there are viability issues relating to a number of sites which will result in lower levels of affordable housing being delivered or none whatsoever.</p> <p>The Council acknowledge that there is an acute need to supply more affordable housing. The simple fact is that there are currently in excess of 900 households on the Councils housing waiting list and that this is likely to increase for the foreseeable future. * The Council published in August 2016 a position statement with regard to the provision of affordable housing. It is important to note that there has been a failure to provide affordable housing on 6 out of 7 major schemes in the Borough due to viability issues. * A housing need survey for Lower Kingswood was undertaken earlier this year and it is not surprising that this demonstrated that there was also an unsatisfied need for affordable housing locally.</p> <p>It is our clients intention to offer to provide 40% affordable housing, being in excess of the 30% normally sought, but rarely</p>	<p>c. South and south west of Reigate: up to 500-700 dwellings</p> <p>The Core Strategy (Policy CS6) makes clear that the Council does not intend (or need) to allocate or release sites outside of these 'broad areas of search' in order to meet the housing target set out within the plan of 460 homes per year.</p>	
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<p>achieved on major sites such as the subject site. This commitment would go some way to addressing the acute need for affordable housing in the Borough and meet the local need.</p>		
<p><b>Suggested Site</b> - Albert brewery in Horley? Currently derelict.</p>	<p>We are not able to include this in the DMP as national policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply. The site forms part of a designated employment area which we are seeking to retain for employment uses.</p>	
<p><b>Suggested site - Alma House, Alma Road, Reigate:</b> This run down office should be redeveloped as residential</p>	<p>We are not able to include this in the DMP as national policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply.</p>	
<p><b>Proposed site - Former Barclays Bank, Tadworth:</b> The old barclays bank building has now been empty for some time for let as a shop for which it seems very unsuitable. It would be better used as a restaurant but it seems there are no takers.It could be</p>	<p>This is located within a local centre designation. Proposed retail policies will allow greater flexibility to allow changes to restaurants within local centres.</p>	

<p>converted into two flats with parking space cut into the hill behind. At present it is a disgraceful mess.</p>		
<p><b>Proposed site - Former Citygate Mini, tadowrth:</b> This site was a sales outlet for cars and is of a significant area but close behind the housing development at Willowbank Gardens. It would be an ideal site for 3/4 small blocks of 1/2 bedroom flats with on site parking for younger commuters being next to the station - see development at Ewell West Station</p>	<p>Tadworth Tyres have recently moved into the unit following a period of vacant occupation. Removal of employment uses on the site would run contrary to policy</p>	
<p><b>Proposed site - Horley</b> - Why is the old Philips site on the junction of Cross Oak Lane and the A23 not considered either for housing or other forms of development?</p>	<p>The landowner has confirmed that they have no intention of putting this site forward for housing, it is required for future commercial expansion. We cannot force landowners to develop their land</p>	
<p><b>Proposed site - Land south of Coppice Lane:</b> Would this site be a potential site for development in the future? Not sure if it has protected status?</p>	<p>Land to the south of coppice lane is within the Green Belt, conservation area and comprises an area of potential site of nature importance</p>	

<p><b>Proposed site</b> - Reside Developments Ltd is the owner of land at Frith Park Farm, Walton on the Hill, as shown in yellow on the attached plan.</p> <p>The site currently benefits from planning permission for a mixed-use redevelopment comprising 37 residential dwellings and employment uses (App. No. 16/01018/S73 and 14/01494/F). The site is previously developed land within the Green Belt. Prior to the release of undeveloped Green Belt land to the south of Reigate and Redhill and the east of Merstham, the Council should look to maximise opportunities on previously developed sites within the Green Belt. National Planning Policy Framework encourages the effective use of land by reusing land that has been previously developed and requires local planning authorities to significantly boost the supply of housing.</p> <p>The planning permission confirms that the principle of residential development on the site is acceptable. Reside Developments is therefore seeking the removal of the site from the Green Belt and its inclusion in the Development Management Plan as a residential allocation (it is considered that the site is suitable and has the potential to provide a greater number of units than currently consented, a point that can be further discussed with the local planning authority ahead of further consultation).</p> <p>Allocation of the site would help ensure that the housing requirement in Area 1 (North Downs) and the Core Strategy Policy CS13 (at least 6,900 homes between 2012 and 2027) will be met.</p>	<p>The site already has planning permission so it is not considered necessary to include this within the Development Management Plan or to remove this site from the Green Belt given its scale and context.</p>	
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<p><b>Proposed - Reigate station car park</b> -This is adjacent to the Homebase building which is allocated as continued retail warehousing. We recognise that this site may be difficult to develop as housing but if a similar approach is adopted to that taken in Redhill (multi-storey station car park provision, together with town centre apartments close to the station) then this car park site should be considered as a potential site for better provision of parking,</p>	<p>We are not able to include this in the DMP as national policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply. Homebase have indicated that they do not wish to develop their site.</p>	
<p><b>Redhill/East Redhill:</b> I suggest insets the council looks at all the empty office space in the town centre and changes the planning permission so that offices can be converted to flats. There are also empty industrial lots on the A23 south of Redhill.</p>	<p>Permitted development rights allow offices to change to residential without full planning permission. Without being specific with sites we cannot comment in detail. However, the Council has an urban areas first approach. Urban area site allocations in the DMP will be delivered first, to support this the Council are preparing a brownfield register and are identifying a number of sites in the DMP. However, in order to put sites in the DMP landowners must have indicated that the sites are available for the proposed development. We cannot force landowners to develop their land.</p>	
<p>Vacant offices in town centres - Where offices have remained vacant for a number of years these should be considered as housing sites, rather than leaving them to become windfalls which cannot be counted towards Local Plan allocations. A survey of landlords to determine the likelihood of different sites being permitted for conversion should be carried out and the sites identified included in the SHLAA.</p>	<p>Windfalls are taken into account in calculating the 5 year housing supply.</p>	



<p>Space over existing shops - The DMP should include a survey of current usage of all first-floor-and-above space in the main shopping centres (Redhill, Reigate, Horley) as well as in smaller retail centres identified in the plan, for example along the Brighton Road shopping parade just south of Redhill town centre.</p> <p>The Plan should positively support conversion of space above shops into residential units. Some examples to consider are:</p> <ul style="list-style-type: none"> <li>- Above Wilkinson's (Redhill) – Estimate 4-6 units.</li> <li>- Above Boots block – currently two storey (High St, Redhill)</li> <li>- Above the brick-built two storey block including the Salvation Army shop (Station Rd, Redhill). Extend to 3-4 storeys. Estimate 4-6 units</li> <li>- Above (or more likely redeveloping with additional storeys) the block including Barclays Bank (Station Rd, Redhill). Estimate 12 units.</li> </ul>	<p>Knowles House in Redhill is an example where this is being done when there is landowner intentions for this. We cannot force landowners to do this.</p>	
<p>Space over new shops - We note that retail frontages are generally regarded as ground floor units; new retail development therefore offers an opportunity of additional residential units on upper floors.</p>	<p>The Core Strategy requires new development to make efficient use of land and the DMP encourages residential uses in retail areas.</p>	
<p>Redundant garage blocks - We have seen some positive schemes to convert redundant garages to housing, and Raven Housing Trust is said to be reviewing all options for garages (e.g. Arbutus Close. 40 garages to 7 houses.). This has been successfully proposed and delivered elsewhere in the Borough too. The Council should work with all social housing providers to identify the extent to which similar sites can be brought forward, while ensuring that sufficient public open space is retained in the areas concerned.</p>	<p>An exercise to identify all garages with redevelopment potential and contact made with them has been undertaken. The outputs of this will go into the brownfield register.</p>	

<p><b>Proposed site - Redhill Station</b> allocate the station site in terms of the range of uses, quantum of development and heights to support the long term regeneration of Redhill.</p> <p>Site A comprises an area of 0.97 ha located to the west of the railway line Site B comprises an area of 1.20 ha and is located to the east of the railway line. An additional Site, known as Site C, currently accommodates a community scout hut, which is located to the south of site A and the former Odeon cinema site. Planning permission to provide retail and residential mixed use development was approved in January 2014 (13/00848/F). A number of applications have also been submitted to discharge planning conditions have been decided, however some still remain under consideration.</p> <p>committed to the delivery of the Redhill Station sites as soon as possible. We seek the establishment of the sites in planning policy in order to secure them for residential-led mixed use development.</p> <p>sites are ideally located for high density development of circa 350 residential units, being located immediately adjacent to Redhill Station and benefitting from good public transport. This is in accordance with density standards and proposed changes to the NPPF which were consulted on from December 2015 to February 2016. These proposed changes expected local planning authorities, in both plan-making and in taking planning decisions, to require higher density development around commuter hubs, wherever feasible, in order to make more efficient use of land in suitable locations. Commuter hubs are defined as transport interchanges that have a frequent service running at least every 15 minutes, such as Redhill Station. Furthermore, the CS identifies Redhill town centre as a priority regeneration area and the heart of the transport hub. The Core Strategy recognises that the town centre has the potential to</p>	<p>The principle of mixed use development on this site has already been confirmed through previous planning applications. Government guidance is also more than ever to concentrate development within transport hubs and the principles proposed in the DMP (DES4) regarding tall buildings support tall buildings in the right locations such as this (subject to appropriate design). As such, it is not considered necessary to include this site in the DMP.</p>	
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<p>provide up to 750 new housing units between 2012 and 2022, with the majority of these being high-density units associated with opportunity sites in the town.</p> <p>A small element of retail use may also be considered appropriate at ground floor level to support ground floor active frontages in key areas of the site, adjacent to the station.</p> <p>Overall, the Redhill Station sites are located within a priority area for regeneration and growth and in a sustainable location in the urban area of Redhill town centre. Therefore, we consider that the emerging Development Management Plan should allocate the Redhill Station sites as a site for residential-led, mixed use development.</p>		
<p><b>Proposed site/land swap - Lavender Sandpit, Cockshot Hill:</b></p> <p>This urban open area is not accessible to the general public therefore fails to meet requirements of Principles 1 and 3 in the detailed assessment. Previous appeal decisions have established the principle of "land exchange" to allow for some devt to fund access and management of the remainder. An amendment to the boundary adjoining Randall Crescent would allow for this to occur without affecting the overall qualities of the land to meet the 3 Principles.</p>	<p>This is a regionally important geological area and is also designated as urban open space, as such would not be suitable for development. The site has been assessed against all the principles and is still being recommended for retention as Urban Open Space - details of this can be found in th Urban Open Space Review Report 2017</p>	
<p><b>Propose - Belfry Centre, Redhill</b> - It may be possible to provide residential units above the retail frontages owned by the Belfry car park owner. Additional parking may be possible through additional height on top of the Belfry car park, together with a mixed use/residential development. Either way this split level, split use car park has poor space utilisation and could be improved. Not estimated.</p>	<p>We are not able to include this in the DMP as national policy (NPPF para 47) requires sites to be developable, which requires them to be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. The landowner has not responded to our requests for confirmation on intentions so we do not know if it is available. Should it be bought forward for housing then it will count towards the Councils 5 year housing supply.</p>	

HOR9		
<p>Proceeding with the current draft DMP without addressing the shortcomings in the approach to site selection and cross-boundary cooperation, would fail to meet the tests for soundness</p>	<p>This comment has been noted. To inform the site selection, the Council commissioned Nathaniel Litchfield &amp; Partners to advice on locational factors key to a successful strategic employment site. The Council then undertook a Strategic Employment Provision study which assessed the suitability and sustainability of a number of sites for strategic employment provision. Sites were assessed in accordance with their fit with the critical success factors of a strategic employment site (these factors were identified by Nathaniel Litchfield &amp; Partners) and in terms of planning constraints and opportunities. Two sites (SEH1 and SEH2) were identified as being the most suitable - these sites form the proposed site allocation HOR9. In terms of cross-boundary cooperation, the Council has a duty to co-operate with neighbouring authorities and authorities within the Gatwick Diamond. These authorities have fed into the Chilmark reports.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>SUPPORT HOR9: Horsham District Council welcomes the discussions that were held at an officer level in August this year, in which the context for the proposed allocation of this site was explained in further detail. Overall, Horsham District Council is supportive of the need for land to be provided for business development within the Gatwick diamond as a whole, and consider that this will benefit the wider economy of all districts and boroughs in the Gatwick Diamond area.</p>	<p>This comment has been noted. Reigate &amp; Banstead Borough Council recognise the importance of working with both neighbouring authorities and authorities in the Gatwick Diamond to ensure the delivery of HOR9 is compatible with existing and proposed developments in both neighbouring authorities and the wider Gatwick Diamond. The Chilmark Reports have analysed the impact of HOR9 on existing and proposed developments. Horsham District Council fed into these reports. The reports concluded that the delivery of HOR9 and the North Horsham allocation would be compatible given that the North Horsham site is</p>	<p>Policy has been updated in line with updated evidence base</p>

As you will no doubt be aware, Horsham District Council, together with Mid Sussex District Council and Crawley Borough Council undertook an Economic Growth Assessment in 2014, in order to understand how each council may best achieve economic growth, and to provide a basis on which to develop land use planning policies to achieve this.

In response to the Employment Growth Assessment, Horsham District Council allocated 4.6ha of land for a high quality business park as part of the allocation of land to the land north of Horsham (Policies SD1 and SD2 of the Horsham District Planning Framework, 2015). The Council would therefore welcome continued dialogue with Reigate and Banstead to ensure that the wording of any future policy for HOR9 allows for business development that is complimentary to the Land North of Horsham allocation, and enables both developments to jointly contribute to the continued economic success of the Gatwick diamond as a whole.

focussed on meeting local needs and provision gap within Horsham.

<p>It recognised that the proposal, if taken forward, will have some transport impacts, including the need for a new access from the M23 and transport measures to manage additional traffic on the Balcombe Road and the Chequers roundabout. It may however be necessary to undertake further assessment (in consultation with WSCC) to ensure that impacts on the road network will not have severe impacts on roads within Sussex, including those in Horsham District</p>	<p>This comment has been noted.          There have and continue to be ongoing discussions with Surrey County Council, West Sussex County Council and Highways England.          Access to the site via Balcombe Road will be restricted to public transport and emergency services.          To inform the Regulation 18 Development Management Plan a transport assessment was undertaken by Surrey County Council and to inform Regulation 19 a further transport assessment has been undertaken.          A transport assessment/ transport statement will need to be provided with the planning application which demonstrates that there will be no severe residual impact on the local and strategic road network taking into account the impact of committed development in the borough and surrounding areas including West Sussex.</p>	<p>Policy has been updated in line with updated evidence base</p>
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The western areas of HOR 9 regularly flood, and often at surprising times. As a civil engineer, I suspect simple SUD systems will NOT be sufficient.

This comment has been noted.  
The proposed policy requires appropriate flood mitigation and attenuation measures to ensure that there is no increase in the risk of flooding to the site and any neighbouring properties. It also requires opportunities to reduce cause and impact of flooding to be explored. To inform Regulation 19, a Level 2 Strategic Flood Risk Assessment has been undertaken which identifies a number of requirements and recommendations for HOR9. These include requiring development to be designed in a sequential approach (all built development to be restricted to Flood Zone 1); requiring a site specific flood risk assessment and surface water drainage strategy to accompany the report; requiring onsite attenuation options to ensure that altering the timing of peak flows leaving the site does not exacerbate flooding downstream; compensation storage to be provided for any land-raising within the 1 in 100+ appropriate climate change flood extent; and development should adopt source control SuDs techniques to reduce the risk of flooding due to post-development runoff.

Policy has been updated in line with updated evidence base

<p>Yes there is a nice roundabout on the M23 spur road to which a connection could be made but has anyone really thought about the consequences of this at peak times? It is not a quiet roundabout, with many drivers doing stupid things now without more trying to get on and off on a fourth side. Existing peak time tail-backs from the east and west should not be under-estimated.</p>	<p>This comment has been noted. The Council is engaged in ongoing discussions with Highways England, Surrey County Council and West Sussex County Council in order to understand the impact of the proposed site on the M23. Improvements are planned to improve capacity and flow of the M23 - the M23 is expected to be transformed into a Smart Motorway by 2020. A planning application would be required to submit a transport assessment/ transport statement that demonstrates that there will be no severe residual impact on the local and strategic road network, taking into account the impact of committed development in the borough and surrounding areas including West Sussex. To reduce the number of journeys by car, the proposed policy requires improvements to public transport, cycleways and public footpaths.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p><b>HOR9</b> - As identified in our comments earlier in these representations, we object to the proposed allocation of the site for strategic employment provision. Instead, RBBC should consider the site as a strategic open space allocation, to provide a mix of informal and formal open space, including the Town Park. The site is in an accessible location, and is of size, layout and topography which provides flexibility to meet a wide range of open space requirements.</p>	<p>This comment has been noted. The Local Employment Needs Update, Employment Opportunity Study and Chilmark Reports identify the need for provide a strategic employment site. A number of sites were assessed and HOR9 was identified as the most suitable. In terms of open space, the site currently offers limited public access - access is restricted to a public right of way. The public right of way would need to be retained and 5ha of open space would be provided. As outlined in the Horley Open Space Paper, there is no longer a need to provide a town park.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>The county council's transport development planning team has concerns regarding the</p>	<p>This comment has been noted. There are currently ongoing discussions with Highways</p>	<p>Policy has been updated in line with</p>



transportation impact of providing an employment development of the scale proposed in this location. From a civil engineering point of view, the existing roundabout is not designed for a fourth arm, and there is likely to be difficulty in providing access to the site from the M23 spur due to a difference in levels. As part of the Horley regeneration works, the Highway Authority has implemented improvements at the Longbridge roundabout junction to the west of the site, to facilitate access by the Fastway bus service from Gatwick to Horley. However, despite these improvements, there is still excessive queuing at this junction in the AM and PM peak periods. The proposed development would lead to a significant increase in traffic at the Longbridge junction, yet there is not much more that could be done to improve safety and capacity at this roundabout. No vehicular access should be provided from the site onto Balcombe Road, as this is a district distributor road which provides access to schools and further residential roads. Key junctions along Balcombe Road, such as the Smallfield Road and Victoria Road junctions, are already problematic in terms of safety and capacity, and a new employment site of the size proposed would significantly worsen the existing situation.

England, Surrey County Council and West Sussex County Council. Surrey County Council undertook a transport assessment to inform the Regulation 18 Development Management Plan and further works have been completed to inform Regulation 19. The proposed policy says that the main access to the site will be via the M23 spur and access to the site from Balcombe Road will be restricted to public transport and emergency services. A transport statement/ transport assessment would need to accompany the planning application which would need to demonstrate that there will be no severe residual impact on the local and strategic road network, taking into account the impact of committed development in the borough and surrounding authorities.

updated evidence base

<p>HOR 9 - There is no explanation of why only the western area is being progressed when agreement has been made to investigate the development of land to the east also. We wonder if the eastern part is a long term objective or whether the demand does not exist? If it progresses, we welcome the intention to provide an open corridor separating Gatwick and Horley and for an area of public open space presumably at the northern end of the site.</p>	<p>This comment has been noted. The Development Management Plan plans to meet employment needs over the plan period (2014-2027). Over this time period there is no need to provide employment on both the eastern and western parts. Should the eastern side be brought forward, this would be in the much longer term (beyond the extent of the plan period) and the 'need' for the site would need to be demonstrated. The proposed policy seeks to provide at least 5ha of high quality open space, including parkland and sports provision. This area will ensure a gap between Horley and Gatwick Airport.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>Presumably there will be less demand for commercial floor space if a second runway at Gatwick does not progress</p>	<p>This comment has been noted. The 'need' for HOR9 is based on the current runway situation (1 runway at Gatwick with support from the Government for an additional runway at Heathrow). Crawley Borough Council are still required by national government to safeguard the potential second runway site. The Chilmark Studies considered what impact the release of this safeguarded land would have on HOR9. They felt that whilst this would lead to a significant increase in potential land, theoretically release would only lead to meeting only Crawley's unmet need and not Reigate &amp; Banstead's. They felt that in reality the safeguarded land would be more likely to come forward as industrial use (or a greater proportion as industrial compared to offices) and noted that there were also additional competing uses for the safeguarded area including the need to provide housing. Nathaniel, Litchfield &amp; Partners looked at the potential drivers of a strategic employment site and felt that airport related businesses would not be a main driver. Instead, they felt that proximity to the airport is beneficial in terms of</p>	<p>Policy has been updated in line with updated evidence base</p>

	access to the wider world. Whilst a second runway would facilitate greater access, Gatwick Airport remains committed to improving the range of destinations that it fly's to.	
We support a balance of uses including warehousing and small industrial units rather than just offices, although doubt that the displaced businesses from elsewhere would be able to afford new units of accommodation.	This comment is noted. The Chilmark Reports identified both a 'need' for office accommodation within the area and market demand for office accommodation. The provision of a mixed use business park would lead to competition between HOR9 and Manor Royal and other industrial estates within the area, the specific allocation of a high quality office development means that it has a different offer and is complementary to other existing employment areas.	Policy has been updated in line with updated evidence base
It would also appear that the proposal is, in part, to offset the development of several small industrial estates, most of which are some distance from this proposed business park. We consider it may be unreasonable to assume they will all be able to relocate to this location because of distances and costs involved so request measures will be in place to assist successful relocation.	This comment has been noted. It is recognised that whilst some businesses will not want to relocate to HOR9 others will. Those moving to HOR9 will free up space/ competition for space for businesses which do not want to move to HOR9.	Policy has been updated in line with updated evidence base
We also request that should this site be allocated in part for a business park, there will be no releases of Green Belt land elsewhere in the Borough for large employers and that important employment sites like that of Legal and General in Kingswood will remain in employment use. Should this latter site go for housing, we question the Council's case on need for commercial floorspace.	This comment has been noted. HOR9 is not in the Green Belt, but rather the Rural Surrounds of Horley. The Development Management Plan does not plan to release any Green Belt land for employment within this plan period. Whilst the Legal & General site has been promoted for housing development, it is not allocated within the Development Management Plan as it is not located within the areas of search outlined in the adopted Core Strategy.	Policy has been updated in line with updated evidence base

	<p>Loss of employment would therefore run contrary to policy, however, there may be some potential under permitted development rights. The Legal &amp; General Site is a completely different offer to HOR9 (it is a largely rural, standalone, HQ style office, whereas HOR9 is proposed to be a high quality office development, close to Gatwick Airport in the heart of the Gatwick Diamond) loss of the site would therefore not indicate a lack of demand for office accommodation.</p> <p>The Local Economic Needs Update, Employment Opportunity Study and Chilmark Reports outline the 'need' for a strategic employment site. The Chilmark Reports also confirm that there is market demand for a strategic employment site.</p>	
<p>Regarding the proposed site in Balcombe Road Horley, the close proximity of Gatwick to MVDC's south east boarder already contributes to increased traffic on the local road network to the south east of the District. Further development in this area has the potential to put additional pressures on the road network between RBBC and MVDC. Of particular interest are the potential reserve urban extension sites to the South and South West of Reigate and the impact they may have on the A25, the surrounding local roads and the level of vehicle movements passing through the District. The A25 is a principal route through Mole Valley which runs from/to Guildford on its western boundary and Reigate &amp; Banstead on the eastern boundary. Traffic</p>	<p>This comment has been noted.</p> <p>HOR9 will be accessed primarily via a dedicated junction from the M23 spur with access along Balcombe Road restricted to public transport and emergency services. The proposed policy also requires public transport, footpath and cycleway improvements in order to reduce the impact on the local roads. A transport statement/ transport assessment will be required to accompany the report, it will need to demonstrate that there will be no residual impact on the local and strategic road network, taking into account the impact of committed development in the borough and wider area.</p> <p>There are ongoing discussions with Surrey County Council, West Sussex County Council and Highways England. To inform the Regulation 18 Development Management Plan a transport assessment was undertaken by Surrey County Council and a further transport assessment has been undertaken for Regulation 19.</p>	<p>Policy has been updated in line with updated evidence base</p>

heading into Mole Valley from Reigate along the A25 into Dorking already builds up during peak times causing congestion on the approach to the town. Paragraph 6.1.6-6.1.7 of the Transport Assessment recognises the likelihood of additional vehicle delay and a need for mitigation on parts of the highway network which are under stress. This stretch of the A25 is identified as being under stress on the map at figure 4.12. The infrastructure requirements of the proposed potential urban reserve sites identify that improvements to the road networks will be needed in order to support the traffic growth in this area and MVDC would encourage this.

As with MVDC, RBBC is heavily constrained and the majority of new development has to be accommodated on smaller sites which makes it difficult to phase development and ensure the provision of infrastructure and services is in line with the rate of building. MVDC would ask that RBBC are aware of this as and when applications begin to come forwards.

<p>If it progresses, we welcome the intention to provide an open corridor separating Gatwick and Horley and for an area of public open space presumably at the northern end of the site.</p>	<p>This comment has been noted. The proposed policy seeks to provide a strategic gap between Horley and Gatwick Airport; a 'landscape buffer' of at least 30m in width between Horley and the business park; and the provision of at least 5ha of high quality open space. In terms of the location fo the open space, Reigate &amp; Banstead Borough Council will prepare a masterplan for the site which will accompany the policy in a supplementary planning application.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>We support a balance of uses including warehousing and small industrial units rather than just prestigious offices, although doubt that the displaced businesses from elsewhere would be able to afford new units of accommodation.</p>	<p>This comment is noted. The Chilmark Reports identified both a 'need' for office accommodation within the area and market demand for office accommodation. The provision of a mixed use business park would lead to competition between HOR9 and Manor Royal and other industrial estates within the area, the specific allocation of a high quality office development means that it has a different offer and is complementary to other existing employment areas. Whilst not all displaced businesses may wish to relocate to HOR9, some businesses will. This will free up space within the existing employment areas for other businesses to move into.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>Presumably there will be less demand for commercial floor space if a second runway at Gatwick does not progress.</p>	<p>This comment has been noted. The 'need' for HOR9 is based on the current runway situation (1 runway at Gatwick with support from the Government for an additional runway at Heathrow). Crawley Borough Council are still required by national government to safeguard the potential second runway site. The Chilmark Studies considered what impact the release of this safeguarded land would have on HOR9. They felt that whilst this would lead to a significant increase in potential land,</p>	<p>Policy has been updated in line with updated evidence base</p>

	<p>theoretically release would only lead to meeting only Crawley's unmet need and not Reigate &amp; Banstead's. They felt that in reality the safeguarded land would be more likely to come forward as industrial use (or a greater proportion as industrial compared to offices) and noted that there were also additional competing uses for the safeguarded area including the need to provide housing.</p> <p>Nathaniel, Litchfield &amp; Partners looked at the potential drivers of a strategic employment site and felt that airport related businesses would not be a main driver. Instead, they felt that proximity to the airport is beneficial in terms of access to the wider world. Whilst a second runway would facilitate greater access, Gatwick Airport remains committed to improving the range of destinations that it fly's to.</p>	
<p>We are asked whether the proposal should be explored further, but already the Council has commissioned consultants for further work and it would appear that the decision has been made.</p>	<p>This comment has been noted.</p> <p>Whilst Reigate &amp; Banstead's Property Team have entered into a joint venture to explore the possibility of delivering a strategic employment site in this area, the Policy Team have only considered the planning policy context of the site.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>We understand that Surrey County Council has land interests in the area and that the Borough council needs to find alternative streams of funding as government grants reduce.</p>	<p>This comment has been noted.</p> <p>Whilst it is recognised that both Reigate &amp; Banstead Borough Council and Surrey County Council need to explore alternative revenue streams, Reigate &amp; Banstead Borough Council's Planning Policy Team have only considered the planning policy context of the site.</p>	<p>Policy has been updated in line with updated evidence base</p>

<p>It would also appear that the proposal is, in part, to offset the development of several small industrial estates, most of which are some distance from this proposed business park. We consider it may be unreasonable to assume they will all be able to relocate to this location because of distances and costs involved so request measures will be in place to assist successful relocation.</p>	<p>This comment has been noted. It is recognised that whilst some businesses will not want to relocate to HOR9 others will. Those moving to HOR9 will free up space/ competition for space for businesses which do not want to move to HOR9.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>If the intention of the possible strategic employment location is to accommodate some of Crawley's unmet business needs, a clear B-Class business-led focus will be needed to achieve this, and the preference of Crawley Borough Council would be to see a significant business element of business floorspace as part of any proposals.</p>	<p>Reigate &amp; Banstead Borough Council note the importance of ongoing discussions with neighbouring authorities and authorities in the Gatwick Diamond area. Crawley Borough Council's comments have fed into the Chilmark Reports. The proposed policy for HOR9 seeks to deliver a high quality office led development.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>The supporting policy text outlines that such a development could help accommodate unmet employment needs from neighbouring authorities, whilst addressing gaps in the range, type and quality of business premises within the Gatwick Diamond. The text also puts forward that a strategic employment location could help to offset the loss of employment land that has occurred in Reigate and Banstead Borough as a result of the permitted development</p>	<p>This comment has been noted. Reigate &amp; Banstead Borough Council recognises the importance of ongoing discussions with neighbouring authorities and wider authorities in the Gatwick Diamond area. These authorities have provided comments and fed into the Chilmark reports.</p>	<p>Policy has been updated in line with updated evidence base</p>



rights.

Crawley is the leading economic driver in the Gatwick Diamond, identified by Coast to Capital Local Enterprise Partnership as forming part of the Heart of the Gatwick Diamond, and recognised by the Gatwick Diamond Initiative as the main sub-regional focus for future economic development. There is a strong demand from businesses wishing to locate in Crawley, though the scope to accommodate identified business needs is severely limited by the constrained land supply position in Crawley borough, which is significantly affected by the requirement to safeguard land in the north of the borough for a possible second runway at Gatwick Airport.

The Crawley Borough Local Plan (adopted 2015) plans positively for sustainable economic growth within the context of the borough's constrained land supply, protecting and intensifying the use of existing main employment areas, and supporting minor extensions to Manor Royal to facilitate business-led economic growth. Despite this, the constrained land supply means there is an unmet need for business land in Crawley of 35 hectares over the Plan period.

The CBLP confirms Crawley's commitment to working with neighbouring authorities to address this unmet need in the most appropriate manner and locations, and establishes a hierarchy identified by the Northern West Sussex Economic Growth Assessment (2014), which is complementary to the approach promoted by the Coast to Capital Local Enterprise Partnership in its Strategic Economic Plan.

The preference for Crawley Borough Council is to explore options to accommodate Crawley's needs within the CBC borough boundary in the north of the borough, and an Area of Search is identified on the CBLP Key Diagram. This land is however largely constrained by safeguarding for the possible development of a second runway at Gatwick Airport. In the event that identified business land needs cannot be accommodated in Crawley, the second preference identified in the hierarchy would be to direct delivery to land at Crawley/Gatwick, in areas immediately adjoining the borough. The possible development of a strategic employment location at Horley, as identified by HOR9 of the RBBC Development Management (Regulation 18) Plan, may therefore be able to contribute to part accommodating Crawley's unmet business land needs and those of the wider Gatwick

Diamond. The proposed location is situated in close proximity to Crawley, and it is anticipated that Crawley residents would benefit in terms of increased job creation close to the borough. However, any strategic employment development at Horley should only occur where the offer is complementary to the business-led economic function of Manor Royal, and must come forward in a manner which does not compromise Crawley's role at the heart of the Gatwick Diamond. Accessibility by sustainable transport from the site south into Crawley should also be required within the policy.

Further joint working will be needed to scope how a possible strategic employment location at Horley can best help to address Crawley's unmet business land supply needs, and the identified needs of the wider Gatwick Diamond, in a manner which complements the existing function of Crawley in its role as the Heart of the Gatwick Diamond. In the event that a strategic business site at Horley were to be more fully explored, CBC would welcome the opportunity to continue to work with RBBC, the Gatwick Diamond authorities, and key business stakeholders, including Coast to Capital LEP, Gatwick Diamond Initiative, and Manor Royal BID.

<p>Further clarity is required regarding the wider commercial and leisure option, in terms of the quantum of floorspace and the types of commercial use that would be provided. Crawley town centre contains a significant leisure offer, and whilst it is recognised that some leisure uses could serve a wider sub-regional catchment, there would be concern about any proposals that would result in a significant negative impact on the vitality and viability of Crawley town centre. Crawley Borough Council would also seek clarity as to the amount of business floorspace that would be delivered as part of the larger 40-50 hectare option, and would encourage further joint working in this regard.</p>	<p>This comment has been noted. Reigate &amp; Banstead Borough Council recognise the importance of ongoing discussions with Crawley Borough Council.</p> <p>The proposed policy outlines that no more than 10,500sqm of A1, A3, A4, C1, D1 or D2 accommodation should be provided. The Chilmark Reports assessed the potential impact of this development on Crawley town centre and felt that there would be no impact. The proposed policy requires a retail impact assessment to accompany the planning application which demonstrates that there will be no harm on Crawley town centre.</p> <p>In terms of the wider site, this is not planned to be delivered within this plan period.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>Any development of this area should be extremely sensitive to the local residential properties.</p>	<p>This comment has been noted.</p> <p>The proposed policy seeks to ensure an appropriate design and layout to achieve an appropriate transition to, and relationship with, neighbouring residential areas, including through appropriate height, massing and siting of buildings.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>There is no explanation of why only the western area is being progressed when agreement has been made to investigate the development of land to the east also. Is the eastern part a long term objective or does the demand does not exist?</p>	<p>This comment has been noted.</p> <p>The Development Management Plan plans to meet employment needs over the plan period (2014-2027). Over this time period there is no need to provide employment on both the eastern and western parts. Should the eastern side be brought forward, this would be in the much longer term (beyond the extent of the plan period) and the 'need' for the site would need to be demonstrated.</p>	<p>Policy has been updated in line with updated evidence base</p>

Should use article 4 directions to protect existing employment land instead.	This comment has been noted. An Article 4 Direction would not necessarily stop office to residential conversion, it just means that planning permission would be required for the conversion and national planning policy requires that the Council looks favourably at such applications.	Policy has been updated in line with updated evidence base
Concern that this is a fait accompli that has already been decided upon - particularly because the council has already set up a joint venture company to take this forward.	This comment has been noted. Whilst the Reigate & Banstead Borough Council's Property Team have entered into a joint venture to explore the potential for providing a strategic employment site in this areas, the Planning Policy Team have only considered the planning policy context of the site.	Policy has been updated in line with updated evidence base
This development will see the destruction of 50 acres of open space.	This comment has been noted. HOR9 is currently only publicly accessible via a public right of way. The proposed policy seeks the provision of a strategic gap between Horley and Gatwick Airport; a 'landscape buffer' between Horley and the business park of at least 30m width; the retention of existing healthy trees/ hedges; enhancement of green infrastructure on the site; and the provision of at least 5ha of high quality open space.	Policy has been updated in line with updated evidence base
Presumably there will be less demand for commercial floor space if a second runway at Gatwick does not progress.	This comment has been noted. The 'need' for HOR9 is based on the current runway situation (1 runway at Gatwick with support from the Government for an additional runway at Heathrow). Crawley Borough Council are still required by national government to safeguard the potential second runway site. The Chilmark Studies considered what impact the release of this safeguarded land would have on HOR9. They felt that whilst this would lead to a significant increase in potential land, theoretically release would only lead to meeting only Crawley's unmet need and not Reigate & Banstead's. They	Policy has been updated in line with updated evidence base

	<p>felt that in reality the safeguarded land would be more likely to come forward as industrial use (or a greater proportion as industrial compared to offices) and noted that there were also additional competing uses for the safeguarded area including the need to provide housing.</p> <p>Nathaniel, Litchfield &amp; Partners looked at the potential drivers of a strategic employment site and felt that airport related businesses would not be a main driver. Instead, they felt that proximity to the airport is beneficial in terms of access to the wider world. Whilst a second runway would facilitate greater access, Gatwick Airport remains committed to improving the range of destinations that it fly's to.</p>	
<p>This development will destroy the Gatwick Open Setting that separates Horley from the airport.</p>	<p>This comment has been noted.</p> <p>The proposed policy seeks the provision of a strategic gap between Horley and Gatwick Airport and the provision of a 'landscape buffer' of at least 30m in width between the business park and Horley.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>If this land is used, no other green belt land should be released for employment uses.</p>	<p>This comment has been noted.</p> <p>HOR9 is not within the Green Belt.</p> <p>No Green Belt land is planned to be released in this plan period for employment uses.</p>	<p>Policy has been updated in line with updated evidence base</p>

This development will increase traffic congestion in the area, particularly Balcombe Road and the A23, regardless of whether new motorway access is built.

This comment has been noted. HOR9 will be accessed via a dedicated junction from the M23 spur. Access to the site via Balcombe Road will be restricted to public transport and emergency service access. To reduce the impact on the local roads, the proposed policy requires improvements to public transport, pedestrian paths and cycleways.

There have been, and continue to be, ongoing discussions between West Sussex County Council, Surrey County Council and Highways England. To inform the Regulation 18 Development Work, Surrey County Council undertook a transport assessment and **to inform a Regulation 19 Development Management Plan further work has been undertaken.**

A transport assessment/ transport statement will be required to accompany the application, this will need to demonstrate that there will be no severe residual impact on the local and strategic road network, taking into account the impact of committed development in the borough and surrounding areas.

Policy has been updated in line with updated evidence base

The proposed site, and areas around it, regularly floods, and there is concern that measures to divert water away from this site will worsen flooding in surrounding residential areas. Burstow Stream flows through the eastern part of the land, contributing to the flooding.

This comment has been noted. The proposed policy requires appropriate flood mitigation and attenuation measures to ensure that there is no increase in the risk of flooding to the site and any neighbouring properties. It also requires opportunities to reduce cause and impact of flooding to be explored. To inform Regulation 19, a Level 2 Strategic Flood Risk Assessment has been undertaken which identifies a number of requirements and recommendations for HOR9. These include requiring development to be designed in a sequential approach (all built development to be restricted to Flood Zone 1); requiring a site specific flood risk assessment and surface water drainage strategy to accompany the report; requiring onsite attenuation options to ensure that altering the timing of peak flows leaving the site does not exacerbate flooding downstream; compensation storage to be provided for any land-raising within the 1 in 100+ appropriate climate change flood extent; and development should adopt source control SuDs techniques to reduce the risk of flooding due to post-development runoff.

Policy has been updated in line with updated evidence base



<p>Development would have to be supported by an improved highway infrastructure.</p>	<p>This comment has been noted.          There are ongoing discussions with West Sussex County Council, Surrey County Council and Highways England. To inform the Regulation 18 Development Management Plan, Surrey County Council undertook a transport assessment and <b>further work has been undertaken for regulation 19.</b> HOR9 is proposed to be accessed primarily via a dedicated junction from the M23 and there will be a second access from Balcombe Road which will be primarily for public transport and emergency services. The proposed policy also requires improvements to public transport, pedestrian footpaths and cycleways.          The proposed policy requires the planning application to be accompanied with a transport assessment/ transport statement which demonstrates that there will be no severe residual impact on the local and strategic road network (taking into account the impact of committed development in the borough and surrounding areas).</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>A recreational footpath runs through the site.</p>	<p>This comment has been noted.          This public footpath would need to be retained.          The proposed policy seeks to improve public access to open space through requiring at least 5ha of high quality open space, including parkland and outdoor sports.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>We should not have to help other boroughs with their employment needs, or to help Gatwick Airport because it is not in our borough.</p>	<p>This comment is noted.          National planning policy requires us to cooperate with neighbouring authorities and explore ways in which we can meet their unmet needs.</p>	<p>Policy has been updated in line with updated evidence base</p>

<p>This will change the character of the area directly abutting it and of Horley in general by destroying the last elements of a semi-rural village feel in the south of the town, and massively expanding the overall size of the town.</p>	<p>This comment has been noted. The proposed policy requires the planning application to ensure that then design and layout will achieve an appropriate transition to, and relationship with, neighbouring residential areas. Considerations will include the height, massing and siting of buildings. The proposed policy will also require the provision of a strategic gap between Horley and Gatwick and a 'landscape buffer' between Horley and the business park.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>River Mole Biodiversity Opportunity Area</p>	<p>This comment has been noted. HOR9 does not fall within the River Mole Biodiversity Opportunity Area.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>Has an environmental impact assessment been carried out by an independent body such as the Surrey Wildlife Trust?</p>	<p>This comment has been noted. A planning application would need to be accompanied by an environmental impact assessment.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>The Highways Agency have not yet given consent for the proposed M23 access.</p>	<p>This comment is noted. There are ongoing discussions with Highways England, West Sussex County Council and Surrey County Council. As stated in the policy, HOR9 will not be granted planning permission unless it has access from the M23 spur.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>There is a mention of having hotels and cafes on the site, and this will damage local businesses. The business park is too far away from the town centre to bring in any passing trade.</p>	<p>This comment has been noted. The Chilmark Reports considered the impact of HOR9 on Horley town centre. It felt that given the small scale ancillary nature of the proposed retail/ cafe / hotel that the development would be complementary to the town centre. The proposed policy requires an impact assessment to be submitted with the application to demonstrate that there would not be any impact on Horley and Crawley town centres. The proposed policy also seeks to improve the connectivity between the town</p>	<p>Policy has been updated in line with updated evidence base</p>

	centre and HOR9 through upgrading and/or extending the pedestrian and cycle routes.	
If this proposal comes forward, development of the eastern part will become inevitable.	This comment has been noted. The Development Management Plan plans to meet employment needs over the plan period (2014-2027). Over this time period there is no need to provide employment on both the eastern and western parts. Should the eastern side be brought forward, this would be in the much longer term (beyond the extent of the plan period) and the 'need' for the site would need to be demonstrated.	Policy has been updated in line with updated evidence base
The site is regularly used by walkers, joggers, dog-owners, and cyclists. People regularly travel from London to use this particular piece of open space for leisure walking and cycling.	This comment is noted. There is currently very limited public access to this site via an existing public right of way. Should the development be brought forward, the existing public right of way would be retained . There would also be an increase in the amount of public open space - the proposed policy seeks to provide at least 5ha of high quality open space including parkland and outdoor sports.	Policy has been updated in line with updated evidence base
The site contains within it, from east to west, high voltage overhead power lines across it.	This comment has been noted.	Policy has been updated in line with updated evidence base
There will be no accessible green space within walking distance if this goes ahead.	This comment has been noted. The site currently has very limited public access - access is restricted to a public right of way. Should the development go ahead, the existing public right of way would need to be retained. In addition, at least an extra 5ha of public open space would be provided.	Policy has been updated in line with updated evidence base

<p>This would be overbearing and out of scale with the existing neighbourhood.</p>	<p>This comment has been noted. The proposed policy seeks to ensure an appropriate design and layout to ensure an appropriate transition to, and relationship with, neighbouring residential areas. Consideration will be given to the height, massing and siting of buildings.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>PPG17 on Sport and Recreation Assessment said open space should not be built on unless an assessment shows a clear surplus, and there is no assessment for this area that states that.</p>	<p>This comment has been noted. HOR9 does not seek to reduce the amount of open space in the borough. The area is not currently an area of open space and therefore there is no need to demonstrate that there is a surplus of open space. Instead, the proposed policy seeks to provide an additional 5ha of open space.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>Gatwick Airport will presumably have reservations about clogging up the airport access from the M23.</p>	<p>This comment has been noted. Gatwick Airport were consulted as part of the Regulation 18 Development Management Plan and their comments have fed into the Regulation 19 Development Management Plan. There are ongoing conversations with Highways England, West Sussex and Surrey County Council regarding the M23. The M23 is also set to undergo improvements to improve the efficiency of the motorway - it is due to become a Smart Motorway by 2020.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>This proposal will bring concrete warehouses to the end of our gardens.</p>	<p>This comment has been noted. HOR9 is proposed to be a high quality office led development. The proposed policy seeks a 'landscape buffer' of at least 30m in width between Horley and the business park. The proposed policy seeks to ensure that there is an appropriate design and layout to achieve an appropriate transition to, and relationship with, neighbouring residential areas. Consideration will be given to the height, mass and siting of buildings.</p>	<p>Policy has been updated in line with updated evidence base</p>

<p>The proposal would make it more dangerous for schoolchildren who walk to school and the elderly residents who currently walk into the town centre.</p>	<p>This comment has been noted. The proposed policy seeks improvements to pedestrian footpaths between HOR9 and the town centre. There will also be limited additional traffic on Balcombe Road as this access will be restricted to public transport and emergency services.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>It is pointless to provide public open space in the middle of a business park, even if it is additional public space.</p>	<p>This comment has been noted. Whilst the open space will be in a business park, it will be publicly accessible and will be of a high quality. The site currently offers limited public access to open space - there is a public footpath which will be retained.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>This development is only aimed at making money for businesspeople and councillors.</p>	<p>This comment has been noted. Whilst the Council has entered into a joint venture to explore options for developing a business park in this area, the Planning Policy Team have only considered the planning policy context for the identification of the site as a strategic employment site. The 'need' for a strategic employment site is outlined in the Local Economic Needs Update, the Employment Opportunity Study and the Chilmark Reports.</p>	<p>Policy has been updated in line with updated evidence base</p>

<p>Little consideration seems to have been given to site access and any disruption to residents around the area during development and subsequent road links.</p>	<p>This comment has been noted. As stated in the proposed policy, the primary access to the site will be via a dedicated junction from the M23 spur. Access to the site via Balcombe Road will be restricted to emergency services and public transport. To reduce the number of vehicular movements, the proposed policy requires improvements to public transport provision, public footpaths and cycleways. There are ongoing conversations with Highways England, Surrey County Council and West Sussex County Council. Surrey County Council undertook a transport assessment for the Regulation 18 Development Management Plan <b>and a further transport assessment has been undertaken to inform Regulation 19.</b> As stated in the proposed policy, any future planning application would need to be accompanied by a transport assessment/ transport statement which demonstrates that there will be no severe residual impact on the local and strategic road network. This will need to take into account the impact of committed development in the borough and surrounding areas.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>Would be 100% against the proposed industrial development adjacent to the M23 link road. We have almost zero unemployment in this area with job opportunities in Crawley Gatwick and London. There is no case for further employment opportunities in this Borough which will only increase pressure for yet more housing .</p>	<p>This comment has been noted. Whilst Reigate &amp; Banstead Borough Council has a low unemployment rate, a lot of people commute out of the borough to office based jobs in London, neighbouring authorities and the wider Gatwick Diamond area. HOR9 will enable the better provision of jobs locally which will reduce the number of people commuting out of the borough. In terms of additional housing demand, the Council has an adopted Core Strategy with a housing target of 460 dwellings per annum. The Core Strategy recognises that there may be a need to explore the provision of a Strategic</p>	<p>Policy has been updated in line with updated evidence base</p>

	<p>Employment Site. The Chilmark Reports conclude that there will be an additional 621 in-commuters - the majority of these are expected to be from neighbouring authorities and the Gatwick Diamond area.</p>	
<p>It will be vital to ensure that the infrastructure impact associated with a possible strategic employment is fully considered to ensure that development is appropriately integrated and accessible. In particular, it will be important to address any arising impacts on the strategic infrastructure capacity, especially the strategic road network, including the motorway junction. This assessment should take account of the cumulative impact of significant housing permissions, allocations and proposals within the area in and around Crawley, and the growth of Gatwick Airport to its maximum capacity as a single runway, two terminal airport. It will also be important to consider the connectivity and impacts of any strategic employment site within the context of Manor Royal and Crawley. It is highly likely that significant commercial vehicle movements will be generated by development, as well as trips generated by employees accessing the site via a range of transport modes including sustainable transport modes and private motor vehicle.</p>	<p>This comment is noted. To inform the Regulation 19 Development Management Plan, further <b>transport work has been undertaken by Surrey County Council ....</b> In addition, there have been, and continue to be, ongoing discussions with West Sussex County Council, Surrey County Council and Highways England in order to understand the impact of the proposed development. The proposed policy requires a Transport Assessment/ Transport Statement to be submitted which demonstrates that there will be no severe residual impact on the local and strategic road network, taking into account the impact of committed development in the borough of Reigate &amp; Banstead and surrounding areas including West Sussex. The Transport Assessment/ Transport Statement will also need to outline any mitigation measures required.</p>	<p>Policy has been updated in line with updated evidence base</p>

<p>The people of Horley voted in a referendum to be in Surrey in order to remain separated from the airport - by filling in the space between Horley and the airport, the council is going against their wishes.</p>	<p>This comment has been noted. The 1972 Local Government Act transferred both Horley and Gatwick Airport from Surrey into West Sussex in order to unite all areas affected by the major Crawley and Gatwick Airport economy under one supervisory local authority. Due to local opposition, the 1974 Charlwood &amp; Horley Act amended the 1972 Local Government Act and moved the parishes of Charlwood and Horley back from West Sussex into Surrey. The 1974 Act separated Horley from Gatwick Airport administratively, not geographically, as the Act states that 'the new county boundary provided contains no provisions for possible future changes at Gatwick Airport'. The proposed policy requires the provision of an appropriate strategic gap between Horley and Gatwick Airport and a 'landscape buffer' of at least 30m in width between Horley and the business park.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>A number of species were referenced as living in or using the site, including: bats, badgers, herons, crested newts, mosses, grasses, deer (roe, red), woodpeckers (green, greater spotted), owls (barn, tawny, little), trees, foxes, flowers, hedgehogs, sparrow hawks, buzzards, orchids, geese, butterflies, moths, house martins, squirrels, rabbits, insects, bluebells, swifts, horses, mice (wood, harvest), bank voles, cuckoos, terns, gulls, mallards, woodcocks, lapwings, fieldfares, redwings, and kestrels.</p>	<p>This comment has been noted.</p>	<p>Policy has been updated in line with updated evidence base</p>



<p>Traffic wishing to get to the park to/from the M23 will undoubtedly route via Victoria Road, Russells Crescent and Massetts Road. This will, in my opinion, lead to traffic congestion and delays as well as inconvenience for residents along the route. Traffic will then add to the already congested roundabout at Hookwood. An alternative route is through the town centre which will cause a deterioration of the quality of the town in this area. Alternatively traffic will need to cross the Balcombe Road traffic lights by the Kings Head passing by a large school. This will cause danger as a lot of this traffic will be predominantly larger vehicles. If heading south traffic will cross the Antlands Lane roundabout. Immediately to the south of this roundabout is the junction with Redford Road which already gets congested at peak times due to traffic turning right. Additional traffic to/from the business park will exacerbate this issue. The additional traffic will also adversely affect air quality for your residents which is contrary to council and national policy. I believe the traffic issues will be unworkable and will greatly affect the lives and safety of local residents.</p>	<p>This comment has been noted. As stated in the proposed policy, the primary access to the business park will be via a dedicated junction off the M23 spur. Access to the site via Balcombe Road will be restricted to public transport and emergency services. To reduce the number of vehicles accessing the site, the proposed policy requires improvements in public transport, public footpaths and cycleways. As stated in the proposed policy, the planning application will need to be accompanied by a transport statement/transport assessment which demonstrates that there will be no severe residual impact on the local and strategic road network, taking into account the impact of committed development in the borough and the surrounding areas. There are ongoing discussions with Surrey County Council, West Sussex County Council and Highways England. To inform the Regulation 18 Development Management Plan, Surrey County Council undertook a transport assessment <b>and to inform the Regulation 19 a further transport assessment has been undertaken .....</b> In terms of air quality, the Council will continue to monitor, and mitigate, air quality in the area.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>A business park like this will be a waste of money that will never succeed.</p>	<p>This comment has been noted. In reality, the development of the business park will be dependent upon pre-lets. The Employment Opportunity Study, Local Economic Needs Update and the Chilmark</p>	<p>Policy has been updated in line with updated evidence base</p>

	Reports identify the 'need' for a strategic employment site. The Chilmark Reports also identify the market demand for such a site.	
There are nine current policy constraints that apply to this site.	This comment has been noted. There are three existing 2005 Borough Local Plan designations: the rural surrounds of Horley, the need for public open space in Horley and the Gatwick Airport Setting. The rural surrounds of Horley recognises that although the land around Horley is not Green Belt, it is important to protect the rural character of the countryside in the area. The Gatwick Airport Setting recognises the role of the land in preventing the merging of Horley and Gatwick. The proposed policy seeks to provide at least 5ha of public open space to include parkland and outdoor sports; the provision of an appropriate strategic gap between Horley and Gatwick; and land to act as a 'landscape buffer' between Horley and the business park.	Policy has been updated in line with updated evidence base
Boris Johnson has been setting up this grubby deal with the council about Airport City — and doing so behind the backs of the electors.	This comment has been noted. Reigate & Banstead Planning Policy Team have only considered the planning policy context for the need for a strategic employment site. This need is outlined in the Local Economic Needs Update, Employment Area Opportunity Study and the Chilmark Reports.	Policy has been updated in line with updated evidence base
Business parks and offices are considered high risk investments, so how can the council justify going ahead?	This comment has been noted. Whilst Reigate & Banstead Property Team have entered into a joint venture to explore possible strategic employment provision in the area, the Planning Policy Team have only considered the planning policy context. The 'need' for a strategic employment site is outlined in the Local Economic Needs Update, Employment Area Opportunity Study and the Chilmark Reports. The Chilmark Reports show that there is	Policy has been updated in line with updated evidence base

	a market demand for a strategic employment site.	
Socially and emotionally, a big concrete, glass and metal development would have a huge impact that would be immeasurably negative to the people of Horley.	<p>This comment has been noted.</p> <p>The proposed policy seeks to ensure that the design of HOR9 is appropriate, ensuring that there is an appropriate transition to, and relationship with, neighbouring residential areas. It also seeks to reduce the negative impacts through ensuring that there is a 'strategic buffer' of at least 30m width between Horley and the business park; that there a strategic gap between Horley and Gatwick Airport; that there are improvements to public transport, footpaths and cycleways; that the development does not cause a residual impact on the local and strategic road network; that at least 5ha of public open space is provided; and that the development does not impact on the viability and viability of Horley town centre.</p>	Policy has been updated in line with updated evidence base
This type of single-use business space is less marketable than a mixed-use development would be.	<p>This comment is noted.</p> <p>The Chilmark Reports identified both a 'need' for office accommodation within the area and market demand for office accommodation.</p> <p>The provision of a mixed use business park would lead to competition between HOR9 and Manor Royal and other industrial estates within the area, the specific allocation of a high quality office development means that it has a different offer and is complementary to other existing employment areas.</p>	Policy has been updated in line with updated evidence base

<p>The Balcombe Road Bridge is currently not properly maintained, and this will only get worse with the increase in traffic this development would bring.</p>	<p>This comment has been noted.          As stated in the proposed policy, access to the site via Balcombe Road will be for public transport and emergency services only. To reduce the number of vehicle movements in the area, the proposed policy requires improvements to public transport, footpaths and cycleways.          There are ongoing conversations with Surrey County Council, West Sussex County Council and Highways England. To inform the Regulation 18 Development Management Plan, a transport assessment was undertaken and further <b>work has been done to inform Regulation 19</b>. A transport statement/ transport assessment will need to accompany any subsequent planning application. This will need to take into account any committed development in Reigate &amp; Banstead and surrounding authorities and demonstrate that there will be no severe residual impact on the local and strategic road network.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>Living in Horley it seems as if we are slowly pushing our boundary north towards Woodhatch and Salfords, and east towards Smallfield village. To the South we have Gatwick and the building of the new North West sector of Crawley (Forge Wood) and possible extension of Cophorne to the South East means that there is beginning to be a lack of green boundaries between any conurbations in the area. If the area to the west of Balcombe Road is turned into a business park we will again lose an area of green which breaks up current residential areas.</p>	<p>This comment has been noted.          The proposed policy requires a 'landscape buffer' of at least 30m width between Horley and the business park. It also requires the provision of a strategic gap between Horley and Gatwick Airport and requires the provision of at least 5ha of publicly accessible open space.</p>	<p>Policy has been updated in line with updated evidence base</p>

This proposal will destroy mature trees.	This comment has been noted. There are no TPOs on the site. The proposed policy requires landscaping to include the retention of existing healthy trees.	Policy has been updated in line with updated evidence base
This will be acceptable if there is an open corridor to separate Gatwick and Horley, and a new area of public open space, presumably at the northern end of the site.	This comment has been noted. The proposed policy seeks to provide a strategic gap between Horley and Gatwick Airport and at least 5ha of high quality publicly accessible open space.	Policy has been updated in line with updated evidence base
The jobs created will require specialist skills and not be suitable for local residents.	This comment has been noted. The proposed policy seeks to ensure the use of local labour, local supply chain procurement and similar skills/ capacity support and outreach in conjunction with local education and training providers. As stated in the Chilmark Reports the main driving industries will include finance, professional services, insurance and pension, computer and electronics and real estate. These industries are already dominant in the local economy.	Policy has been updated in line with updated evidence base
requirements in respect of sustainable transport (especially cycling) should go beyond linkages to Horley Town Centre and bus station. The penultimate “infrastructure” bullet point should be extended to include upgrading of cycle routes to Redhill and Reigate town centres.	This comment has been noted. As part of the Greater Redhill Sustainable Transport Plan improvements have been made to improve the cycling network between Reigate/ Redhill and Horley.	Policy has been updated in line with updated evidence base

<p>This was not mentioned in the Town Centre Vision for Horley.</p>	<p>This comment has been noted.  The 2015 Horley Town Centre Vision outlines methods to improve Horley town centre, through for example, the creation of edible areas, planting and retail incubators.  The 2014 Core Strategy recognises that there may be a need to provide a strategic employment site. Nathaniel Litchfield &amp; Partners recommended that this should be in the south of the borough, near to Gatwick Airport, in the heart of the Gatwick Diamond. The Council's Planning Policy Team undertook an Employment Opportunity Study in which they assessed a number of sites and found HOR9 to be the most suitable. The 'need' for a strategic employment site is outlined in the Local Economic Needs Update, Strategic Employment Area Opportunity Study and the Chilmark Reports.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>A new business park won't achieve this. Fix the town centre first then improve Salfords.</p>	<p>This comment has been noted.  Horley town centre is a dedicated regeneration area and there have been, and continue to be, improvements to the town centre. The proposed policy requires a retail impact assessment to ensure that the proposed development does not impact upon the viability and vitality of Horley town centre.  As stated in the Employment Area Review, Salfords industrial estate has a very different offer to the proposed strategic employment site - it has a predominantly distribution offer with a notable proportion of light industrial service businesses, whereas HOR9 is proposed to be a high quality office park development. Within the last ten years, the Salfords Industrial Estate has seen significant development and there is on-going refurbishment. The industrial estate has historically had a strong occupancy and vacancies have fallen sharply over the last couple of years.</p>	<p>Policy has been updated in line with updated evidence base</p>

	<p>The Local Economic Needs Update, Strategic Employment Opportunity Study and the Chilmark Reports outline the 'need' for a strategic employment site. The Chilmark Reports also show that there is market demand for a strategic employment site.</p>	
<p>The site is historic and protected farmland under policy HR36 the rural surrounds of Horley.</p>	<p>This comment is noted. Policy Hr36 of the 2005 Borough Local Plan recognises that although the land around Horley is not Green Belt, it is important to protect the present rural character of the countryside in the area. The proposed policy requires the provision of an appropriate strategic gap between Horley and Gatwick airport; a 'landscape buffer' of at least 30m in width between Horley and the business park; the retention of existing healthy trees/ hedges; and the provision of at least 5ha of high quality public open space.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>Core Strategy says to reuse and intensify existing business land instead.</p>	<p>This comment has been noted. The Core Strategy aims to meet local employment needs through recycling redundant industrial land for other commercial employment needs and accommodate office expansion in the existing town centres. The Core Strategy, however, also recognises that there may be a need to work with the Gatwick Diamond authorities and/ or adjoining authorities to identify a site for a strategic employment site. It has become increasingly clear that the borough will be unable to meet its future needs through the reuse and intensification of existing employment sites in the borough. The local economy has been growing more quickly than when the Core Strategy was being prepared and because of recent national planning changes which allow the conversion of offices to residential, there has been a significant loss of office accommodation.</p>	<p>Policy has been updated in line with updated evidence base</p>

	<p>The 'need' for a strategic employment site is outlined in the Local Economic Needs Update, Strategic Employment Area Opportunity Study and the Chilmark Reports. The Chilmark Reports also demonstrate that there is a market demand for a strategic employment site in the area.</p>	
<p>Will not create jobs for locals due to the low unemployment rate, and will therefore encourage more people to move to the area, adding further pressure onto the housing situation, local services, and the green belt.</p>	<p>This comment has been noted.</p> <p>Whilst Reigate &amp; Banstead Borough Council has a low unemployment rate, a lot of people commute out of the borough to office based jobs in London, neighbouring authorities and the wider Gatwick Diamond area. HOR9 will enable the better provision of jobs locally which will reduce the number of people commuting out of the borough.</p> <p>In terms of additional housing demand, the Council has an adopted Core Strategy with a housing target of 460 dwellings per annum. The Core Strategy recognises that there may be a need to explore the provision of a Strategic Employment Site. The Chilmark Reports conclude that there will be an additional 621 in-commuters - the majority of these are expected to be from neighbouring authorities and the Gatwick Diamond area.</p> <p>The impact on the local services has been assessed as part of the infrastructure needs assessment for the plan period. There have been, and continue to be, discussions with infrastructure providers.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>As there is already a very low local unemployment rate, it would appear that many of the workers on the site will be commuting from elsewhere, adding to the already congested highway network. So the development would have to be supported by</p>	<p>This comment has been noted.</p> <p>There are ongoing conversations with Highways England, Surrey County Council and West Sussex. Surrey County Council undertook a transport assessment to inform the Regulation 18 Development Management Plan <b>and further work has been undertaken to inform the Regulation 19</b></p>	<p>Policy has been updated in line with updated evidence base</p>



<p>an improved highway infrastructure.</p>	<p><b>Development Management Plan.</b>  The proposed policy requires a dedicated access to the site from the M23 spur, improvements to public transport, footpaths and cycleways. A planning application would need to be supported by a transport statement/ assessment which demonstrates that there is no residual impact on the local and strategic road network. This would need to take into account committed developments in Reigate &amp; Banstead and adjoining authorities.</p>	
<p>There is no justification for for extra office floorspace when the large Legal and General site is becoming vacant, and when existing central office space is being redesignated for housing, and when there is vacant floorspace in business parks in Crawley, Salfords, and the Metro estate in Horley. Other business parks are being proposed for Horsham and Burgess Hill.</p>	<p>This comment has been noted.  The 'need' for a strategic employment site is outlined in the Local Economic Needs Update, Strategic Employment Area Opportunity Study and the Chilmark Reports.  Whilst there are vacancies in other business parks, this represents a very small amount which would not accommodate this strategic need. The Nathaniel Litchfield &amp; Partners Report found that the majority of the vacant stock is secondary and tertiary accommodation and that there is very little vacancy in high quality office accommodation. The Chilmark Reports also found that there is significant market demand for a high quality office business park.  The Chilmark Reports found that there still was a 'need' for HOR9 even with the other business parks proposed - the North Horsham site and Northern Arc (Burgess Hill) are proposed to meet local needs and the Science &amp; Technology Park (Burgess Hill) has a research and science focus and it was felt that HOR9 and the Science &amp; Technology Park would be complementary and that the economy could support both developments.  With regards to Legal &amp; General, the accommodation could not support the strategic need for an employment site. It is in the wrong location (the Nathaniel Litchfield &amp; Partners</p>	<p>Policy has been updated in line with updated evidence base</p>

	<p>Report advises that a strategic employment site should be in the south of the borough, at the heart of the Gatwick Diamond and in close proximity to Gatwick Airport) and is a different offer (it is a standalone, HQ style office park in comparison to a high quality business park). The site would also not accommodate the quantum of need.</p> <p>The loss of central office space to residential is due to national changes in planning legislation requiring the conversion of offices to residential development without formal planning permission. This has led to increased pressure for office accommodation in the borough.</p>	
<p>There will also be pressure for more housing for employees, bearing in mind the existing low unemployment rates, which will put yet further pressure on the Green Belt and local countryside.</p>	<p>This comment has been noted.</p> <p>Whilst Reigate &amp; Banstead Borough Council has a low unemployment rate, a lot of people commute out of the borough to office based jobs in London, neighbouring authorities and the wider Gatwick Diamond area. HOR9 will enable the better provision of jobs locally which will reduce the number of people commuting out of the borough.</p> <p>In terms of additional housing demand, the Council has an adopted Core Strategy with a housing target of 460 dwellings per annum. The Core Strategy recognises that there may be a need to explore the provision of a Strategic Employment Site. The Chilmark Reports conclude that there will be an additional 621 in-commuters - the majority of these are expected to be from neighbouring authorities and the Gatwick Diamond area.</p>	<p>Policy has been updated in line with updated evidence base</p>

<p>Is this land is used, the Legal and General site should be guaranteed for employment space as well.</p>	<p>This comment has been noted. The Legal &amp; General site has not been allocated for housing development in the Regulation 19 Development Management Plan, loss of employment land would run contrary to policy, however there may be potential for some conversion under permitted development rights. The Legal &amp; General site provides a different offer to HOR9 - it is a standalone, HQ style office development, which is not located in a strategic location (the Nathaniel Litchfield &amp; Partners Report recommends that a strategic employment site is located in the south of the borough, in the heart of the Gatwick Diamond, in close proximity to Gatwick Airport). The Legal &amp; General Site would also not be able to meet the quantum need for a strategic employment site.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>The Chief Executive of the Council is also a director of the Gatwick Diamond group that is involved in promoting this development, and this represents a conflict of interests.</p>	<p>This comment has been noted. The Gatwick Diamond Initiative is a business-led partnership. All of the Chief Executives of the Gatwick Diamond authorities are directors. Reigate &amp; Banstead's Chief Executive does not benefit financially from being a director, rather he is simply Reigate &amp; Banstead's representative.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>There are also several large developments already in the area, the Acres &amp; Landen Farm, and adding another one would mean a massive overdevelopment of this rural area.</p>	<p>This comment has been noted. The proposed policy requires an appropriate design and layout to achieve an appropriate transition to, and relationship with neighbouring areas. It also requires the provision of a 'landscape buffer' of at least 30m width between Horley and the business park, the provision of a strategic gap between Horley and Gatwick Airport and the provision of at least 5ha of high quality open space.</p>	<p>Policy has been updated in line with updated evidence base</p>

<p>The site seems to be partially suggested in order to offset the loss of other, smaller employment sites to residential use - but these sites are some distance away, so help will need to be provided to businesses from those sites that wish to relocate to the proposed site.</p>	<p>This comment has been noted. The loss of office accommodation due to office to residential accommodation has reduced the amount of office accommodation within the borough and has led to increased pressures for office accommodation. Whilst HOR9 may be a distance from some of the sites, it will provide space for businesses wishing to relocate, this will free up space for businesses that do not wish to relocate.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>There is buried building equipment from the construction of the M23 spur in the ground around this area, and this will be expensive to remove.</p>	<p>This comment has been noted.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>Many office workers are now working from home, so more offices are not required.</p>	<p>This comment has been noted. The 'need' for an employment site is outlined in the Local Employment Needs Update, Strategic Employment Opportunity Study and the Chilmark Reports. The Chilmark Reports also demonstrate market demand for a strategic employment site.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>There should be a balance of uses, including warehousing and small industrial units, rather than purely office space.</p>	<p>This comment has been noted. The Local Employment Needs Update, Strategic Employment Opportunity Study and the Chilmark Reports have identified a 'need' for a high quality office led development. The Chilmark Reports also identify that there is market demand for high quality office accommodation.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>The income from this development will be spent on other parts of the borough and not Horley.</p>	<p>This comment has been noted. The Planning Policy Team have only considered the planning policy context for the 'need' for a strategic employment site.</p>	<p>Policy has been updated in line with updated evidence base</p>

<p>This proposal would force families out of their homes, and force a number of businesses out through compulsory purchase orders.</p>	<p>This comment has been noted. The existing uses of the site are predominantly grazing land and equestrian. There is also an office block set within large grounds. Whilst the Council has confirmed that it would be willing to consider using CPO powers, this would be at a last resort.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>What happens to the new business park in 20 years time, will it look drab and be changed to a huge housing estate?</p>	<p>This comment has been noted. Any future office accommodation cannot be easily converted to housing development as permitted development rights do not apply to new buildings.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>There is so much uncertainty about leaving the EU and the effect on business that it seems too risky to build this at the moment.</p>	<p>This comment has been noted. In reality, whilst there is an identified 'need' for a strategic employment site, delivery will be dependent to a large extent on pre-lets, therefore, unless there is market demand for a strategic employment site, it will not come forward.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>The 'Horley Master Plan 2005' states that a development of this nature would "exacerbate existing housing shortages in the Crawley/Gatwick area and thereby diminish the benefit to be gained by the release of land for housing."</p>	<p>This comment has been noted. The Local Employment Needs Update, Strategic Employment Opportunity Study and the Chilmark Reports identify the 'need' for a strategic employment site in the borough. The 2005 Horley Masterplan follows the 1994 public examination advice which says that there is not sufficient justification for proposing major commercial development in Horley, and that this would exacerbate the existing housing shortages in the Crawley/ Gatwick area and thereby diminish the benefit to be gained by the release of land for housing. Since 1994 there have been significant changes to housing provision, employment practices and employment provision within Horley and the wider area. There has been significant new housing (in addition to then planned North East and North West Sectors) and a significant loss of employment</p>	<p>Policy has been updated in line with updated evidence base</p>

	premises (due to office to residential permitted development rights). The borough has a high number of people who travel out of the borough for work, HOR9 will reduce the number of people commuting out of the borough through providing similar jobs.	
This development will increase noise, light, and air pollution in the area.	This comment has been noted. The proposed policy requires development to be sensitively designed to achieve an appropriate transition to, and relationship with, the neighbouring area. The Council will continue to monitor air quality and noise levels in the borough.	Policy has been updated in line with updated evidence base
The planning and development committee rejected plans for a 17 hectare business park and hotel on the Bayhorne farm site in 1989 (RE.89P/616) on the grounds that the plans would; Worsen pressure on housing, be visually intrusive, reduce the gap between Horley and Gatwick (protection of this being a long standing aim of the Local Council), and transport links not sufficient into the site. The committee also identifies the flood risk associated with the site, and highlights that the site would have a negative impact on neighbouring houses. The same barriers preventing development in 1989 still exist today, and another recent application to build houses on the eastern part of the land was turned down because of this.	This comment has been noted. Since 1989, there have been significant changes to housing and employment provision and employment trends within the borough. The Local Economic Needs Update, Strategic Employment Opportunity Study and the Chilmark Reports identify the 'need' for a strategic employment site. In terms of the strategic gap - the proposed policy seeks to ensure that there is a strategic gap between Horley and Gatwick Airport. It also requires a 'landscape buffer' of at least 30m in width between Horley and the business park. In terms of housing demand, the borough has a significant number of people commuting out of the borough to office based jobs in London and neighbouring authorities. HOR9 will provide high quality office jobs of a similar quality and therefore attract some of those commuting out of the borough. The Chilmark Reports attempted to analyse how many additional commuters there would be and where they would be travelling from. They identified an additional 621 commuters and felt that the majority would come from	Policy has been updated in line with updated evidence base

neighbouring authorities/ Gatwick Diamond authorities. The Council has a Core Strategy with an adopted housing target of 460 dwellings per annum. The Core Strategy recognises that there may be a need to provide a strategic employment site in the borough.

In terms of the impact on existing properties, the proposed policy requires that the design and layout will achieve an appropriate transition to, and relationship with, neighbouring residential areas. Consideration will be given to the height, mass and siting of the buildings.

In terms of flood risk, the proposed policy requires appropriate flood mitigation and attenuation measures to ensure that there is no increase in the risk of flooding to the site and neighbouring properties; measures to manage and reduce the surface water run-off; and exploration of opportunities to reduce cause and impact of flooding. To inform the Regulation 19 Development Management Plan, a Level 2 Strategic Flood Risk Assessment has been undertaken which identifies a number of requirements and recommendations for HOR9. These include requiring development to be designed in a sequential approach (all built development to be restricted to Flood Zone 1); require a site specific flood risk assessment and a surface water drainage strategy to accompany the report; requires onsite attenuation options to ensure that altering the timing of peak flows leaving the site does not exacerbate flooding downstream; compensation storage to be provided for any land-raising within the 1 in 100+ appropriate climate change flood extent; and development should adopt source control SuDs techniques to reduce the risk of flooding due to post-development runoff.

In terms of transport impact, the proposed policy requires a

	<p>transport statement/ transport assessment to support the application which demonstrates that there will be no severe residual impact on the local and strategic road network, taking into account the impact of committed development in the borough and surrounding areas. The proposed policy requires a dedicated junction from the M23 spur junction, improvements to public transport, footpaths and cycleways</p>	
<p>Manor Royal/Crawley already has scores of vacant business premises. There is no need for further premises and low unemployment in the area, This is just a money making initiative by RBBC, building on green space that has a history of flooding.</p>	<p>This comment has been noted.          The 'need' for a strategic employment site is outlined in the Local Employment Needs Update, the Strategic Employment Opportunity Study and the Chilmark Reports. Whilst there are vacant units in existing industrial estates, the Chilmark Reports have demonstrated that there is market demand for high quality office accommodation. The Nathaniel Litchfield &amp; Partners Report noted that the majority of the vacant accommodation was in secondary and tertiary stock. The vacant stock would not meet the quantum need for a strategic employment site.          Whilst Reigate &amp; Banstead's Property Team have entered into a joint venture to explore the possibility of delivering a strategic employment site in this area, the Planning Policy Team have only considered the planning policy context. The proposed policy requires appropriate flood mitigation and attenuation measures to ensure that there is no increase in the risk of flooding to the site and neighbouring properties; measures to manage and reduce the surface water run-off; and exploration of opportunities to reduce cause and impact of flooding. To inform the Regulation 19 Development Management Plan, a Level 2 Strategic Flood Risk Assessment has been undertaken which identifies a number of requirements and recommendations for HOR9.</p>	<p>Policy has been updated in line with updated evidence base</p>



	<p>These include requiring development to be designed in a sequential approach (all built development to be restricted to Flood Zone 1); require a site specific flood risk assessment and a surface water drainage strategy to accompany the report; requires onsite attenuation options to ensure that altering the timing of peak flows leaving the site does not exacerbate flooding downstream; compensation storage to be provided for any land-raising within the 1 in 100+ appropriate climate change flood extent; and development should adopt source control SuDs techniques to reduce the risk of flooding due to post-development runoff.</p>	
<p>This will make Horley an unattractive place to live and will lower house prices - people believed this land would not be built on when they purchased their houses.</p>	<p>This comment has been noted. The proposed policy requires a 'strategic gap' of at least 30m width between Horley and HOR9. It also requires an appropriate design to ensure an appropriate transition to, and relationship with, neighbouring residential areas.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>We do not accept the 'need' for this development when there is plenty of unlet office and industrial space within the Gatwick area, and when the Council is proposing changing a number of other sites from employment to residential use.</p>	<p>This comment has been noted. The Local Employment Needs Update, Strategic Employment Opportunity Study and the Chilmark Reports identify the 'need' for a strategic employment site in the borough. Whilst there are vacant employment units within existing centres, the scale would not accommodate the strategic need. The Nathaniel Litchfield &amp; Partners Report found that the majority of the available accommodation was secondary/ tertiary accommodation and the Chilmark Reports found that there was market demand for a strategic employment site. The Council is only proposing the loss of employment accommodation at Bellway House and Quarryside. Quarryside has a very different offer to that proposed at HOR9 and Bellway house can be converted under permitted development rights which allow the conversion of office</p>	<p>Policy has been updated in line with updated evidence base</p>

	accommodation to residential without formal planning permission.	
Manor Royal is not full, Forge Wood also has business units to fill too....	<p>This comment has been noted.</p> <p>The 'need' for a strategic employment site is outlined in the Local Economic Needs Update, Strategic Employment Opportunity Study and the Chilmark Reports.</p> <p>Whilst there are vacant units in existing industrial estates, the Chilmark Reports have demonstrated that there is market demand for high quality office accommodation. The Nathaniel Litchfield &amp; Partners Report noted that the majority of the vacant accommodation was in secondary and tertiary stock. The vacant stock would not meet the quantum need for a strategic employment site.</p>	Policy has been updated in line with updated evidence base
Despite pressures from the LEP, we query the demand for a business park of this size, bearing in mind vacant floorspace on existing industrial estates in Crawley and proposals for new business parks in Horsham and Burgess Hill. The large Legal and General site in Kingswood is also shortly to be vacated. It would be a retrograde step if most employment land is located at the southern end of the Borough, leading to long journey to work movements.	<p>This comment has been noted.</p> <p>The 'need' for a strategic employment site is outlined in the Local Economic Needs Update, Strategic Employment Opportunity Study and the Chilmark Reports. Whilst there are vacant units within existing industrial estates, these are not at a scale to accommodate this strategic need. The Nathaniel Litchfield &amp; Partners Report found that the majority of the vacant units on the existing industrial estates were in secondary/ tertiary accommodation. The Chilmark Reports found that there was significant market demand for high quality offices.</p> <p>The Legal &amp; General site in Kingswood is of a different offer to HOR9. It is a standalone, HQ style office. It would not be able to accommodate the quantum of need of a strategic employment site and is not in the right location for a strategic location (the Nathaniel Litchfield &amp; Partners Report says that a strategic employment site should be in the south of the borough, in the heart of the Gatwick Diamond and within close proximity to Gatwick Airport).</p>	Policy has been updated in line with updated evidence base

	<p>The borough currently has a high number of people commuting out of the borough for work in office based jobs in London and neighbouring authorities, HOR9 is expected to reduce the number of people commuting out of the borough.</p> <p>Chilmark considered the other developments and felt that these would not accommodate the strategic need. The north of Horsham site and the Northern Arc (Burgess Hill) are to meet local needs and the Science &amp; Technology Park (Burgess Hill) has a science focus and was felt to be complementary to HOR9. There are ongoing discussions with both Horsham and Mid Sussex authorities and both have fed into the Chilmark Reports.</p>	
Where will people keep their horses?	<p>This comment has been noted.</p> <p>Reigate &amp; Banstead Borough Council recognise that horse-riding is a popular leisure activity in the borough; that there is a growing demand for grazing, stabling and riding facilities; and that it plays an important role in diversifying the rural economy.</p> <p>Propose policy NHE6 seeks to support the provision of small scale stabling and equestrian facilities providing that it is well designed; preserves the character of the countryside; does not conflict with the nature conservation of the site; does not conflict with the Green Belt; and provides safe and convenient access to bridleways and public open spaces.</p>	Policy has been updated in line with updated evidence base

The overarching objectives are very laudable but I don't understand how some of the proposed developments are in keeping with those objectives. The proposed business park in Horley will be in direct contravention of objectives SC9 and SC10 for example. Other local employment space stands empty within Horley itself and on the nearby Manor Royal and City Place estates; whilst I appreciate the need for employment space development in this instance the development would be destroying biodiversity and local landscapes with significant leisure and health benefits to the local population.

This comment has been noted. Core Strategy Objective SC9 seeks to direct development away from areas at risk of flooding and ensure all development is safe from flood risk and does not increase flood risk elsewhere or result in a reduction in water quality. Core Strategy Objective SC10 seeks to ensure new development protects, and enhances wherever possible, the borough's landscapes and biodiversity interest features, providing the highest degree of protection to internationally and nationally designated areas. These core strategy objectives are intended to be met by policies NHE1-3 and CCF2. Proposed policy NHE1 seeks to retain a visual break between Horley and Gatwick and requires good quality design which respects the landscape character of the area. Proposed policy NHE2 recognises that the borough contains a number of sites that are recognised as being of international, national and local importance in providing habitats for a range of species, some of which are endangered. The proposed policy seeks to protect and enhance biodiversity within these areas. Proposed policy NHE3 recognises that trees, hedges and woodland areas make a particularly valuable contribution to the character and visual amenity of the borough. The proposed policy seeks to protect the trees and woodland areas. Proposed policy CCF2 recognises that flood risk affects a number of areas in the borough and ensures that there is a need for a balance between the need to develop and to ensure the new development is designed safely and will not worsen the risk of flooding for others. The proposed policy for HOR9 requires the provision of an

Policy has been updated in line with updated evidence base

	<p>appropriate strategic gap between Horley and Gatwick Airport and requires a landscape buffer, of at least 30m width, between the business park and Horley. The proposed policy also seeks to retain existing healthy trees/ hedges. The proposed site does not lie within an area of international, national or local importance for biodiversity. In terms of existing vacant units within Crawley, these are of a small number and would not meet the strategic need identified in the Local Employment Needs Update, Employment Opportunity Area and Chilmark Reports. The Nathaniel Litchfield &amp; Partner Report noted that the majority of the vacancies were in secondary and tertiary office accommodation and that there were few vacancies in high quality office accommodation. The Chilmark Reports also identified market demand for a high quality office park. The Strategic Employment Site currently offers very limited access to open space - there is an existing public footpath. The footpath would need to be retained should development take place and the proposed development would provide an additional 5ha of high quality open space including parkland and outdoor sports.</p>	
<p>Any location of such facilities should most logically be placed further south on the other side of the current runway, closer to where the proposed second runway would be and where there would be minimal impact on local residents.</p>	<p>This comment has been noted. This area is currently safeguarded for the second runway.</p>	<p>Policy has been updated in line with updated evidence base</p>
<p>There is a reference to providing cycle and pedestrian routes to Horley and Gatwick Airport - these will not be used, because the airport is on the other side of a motorway.</p>	<p>This comment has been noted. There is currently a public footpath which goes under the road. It is envisaged that the cycle and pedestrian routes would go under the road. They will be of a high quality which</p>	<p>Policy has been updated in line with updated evidence base</p>

	will attract people to use them.	
The site will not help local businesses because the scale is too large, and because local businesses will not need the proposed direct access to the motorway.	<p>This comment has been noted. Chilmark talked to local agents and economic development teams and found that there was a demand for this type of high quality business park.</p> <p>It is recognised that not all existing employers who wish to expand will want to move to HOR9, however, where businesses choose to relocate, they will free up existing employment provision which other businesses can then expand into.</p>	Policy has been updated in line with updated evidence base

HOR9 - The NPPF, Para 20 states LPAs should plan proactively to meet the development needs of local business and support an economy fit for the 21st century. Site HOR9, looks to allocate a strategic employment allocation, that will ensure that the Borough can meet both its economic needs in regard to qualitative and quantitative employment provision. The allocation of the employment site also complies with para 21 NPPF which requires LPA's to set out a clear economic vision to positively and proactively encourage sustainable economic growth, through the identification of strategic sites for local and inward investment. The NPPF para 22, ensures sites should not be protected when no reasonable prospect of site coming forward. With SCC being a land owner within HOR9, it is agreed that the site is identified as deliverable.

SCC own 19.31 ha of land within the site identified as HOR9. The SHLAA identifies the site as HC11 Bayhorne Farm, and has been shortlisted for potentially suitable for 50 dwellings, however DMP identifies SEH1 as part of the potential strategic employment location. SCC understands that the site alongside SEH2 provides a unique opportunity to develop the site within the countryside and rural surrounds of Horley, and is therefore RBBC's preferred option to

This comment has been noted. Reigate & Banstead Borough Council has, and will continue to, consult Surrey County Council as part of their Duty to Co-Operate. Surrey County Council's comments have fed into the Chilmark Reports.

Reigate & Banstead's Planning Policy will complete a detailed masterplan which will accompany the policy in a supplementary planning document. Surrey County Council, as a Duty to Co-Operate body, will be consulted on this supplementary planning document.

Also, when a planning application is made, the applicant will be required to submit a masterplan which will identify the phasing, form, scale and quantum of development. Surrey County Council's involvement in the preparation of this masterplan will depend upon its role as a landowner in bringing the site forward. Surrey County Council will however be able to comment on this application through the planning process.

In terms of access, there are, and continue to be, ongoing discussions with Surrey County Council's transport team, West Sussex County Council's transport team and Highways England. Surrey County Council's transport team undertook detailed modelling to inform the Regulation 18 Development Management Plan and **further modelling has been undertaken to inform Regulation 19.**

Policy has been updated in line with updated evidence base

progress with as an employment allocation given location and proximity to Gatwick and the M23, and need to provide a qualitative employment dev within borough. The evidence base behind potential allocation highlights adjacent Local Authorities have suggested in their own recently adopted local plans they are not able to fully meet their own economic needs. The studies identify that Crawley in particular, identifies a significant unmet need, due to the compact nature of the borough and that a significant area of land is currently restricted by airport safeguarding. RBBC Policy team has been assembling evidence for a potential strategic employment provision since 2014, including developing the policy context and economic rationale for the provision of a quality high profile location. SCC understand studies confirm potential allocation benefits from excellent connectivity given its proximity to Gatwick airport, and therefore HOR9 represents the best area for strategic employment location. With greenbelt protecting a large amount of land across the borough, policy CS3 of the core strategy looks at alternative sites, in regard to their suitability and feasibility to deliver an appropriate strategic employment location. The evidence base studies concludes that the site, now identified as HOR9 being the most favourable comprising SEH1 and



<p>SEH2 based on the fit with success factors including planning constraints and availability. The NLP study confirms that the site is suitable for a mixed employment area with a hybrid of uses, with a scale of 70 hectares of mixed B uses and supporting facilities. Given the extent of the land within SEH1 that forms part of the wider HOR9 site, SCC wish to maintain ongoing discussions with RBBC regarding principles of utilising the site for a strategic employment location, and wishes to be engaged in any masterplanning exercises in regard to how the site may be brought forward, especially in regard to the environment considerations regarding landscaping, access, and flooding, as well as design, scale character and setting within the rural surrounds of Horley.</p>		
<p>The current green area is a carbon sink that captures CO2 and contributes to climate change objectives.</p>	<p>This comment has been noted. This area is not designated as a carbon sink area. The Council will continue to monitor air pollution levels within the area. The proposed policy seeks to ensure that at least 5ha of open space provision.</p>	<p>Policy has been updated in line with updated evidence base</p>

address the sub-regional requirements for economic development as identified within the supporting Evidence Base. The land in question is suitably located within the heart of the Gatwick Diamond sub-region, immediately adjacent to Gatwick Airport and strategic transport infrastructure which, would support such a strategic allocation. The draft allocation is consistent with the NPPF, where Government places “significant weight on the need to support economic growth through the planning system” (NPPF, Para 19). The NPPF continues to advise local planning authorities to plan “proactively to meet the development needs of business and support an economy fit for the 21st century” (NPPF, Para 20). In this context it is important that the Council identify sufficient land to sustain the economic requirements of the Borough, and also pro-actively provide for, and co-ordinate the requirements of the wider sub-region. In allocating land to the west of Balcombe Road’, draft Policy HOR9 suggests that a number of mitigation measures are to be incorporated into the future design of a Business Park. However, it is important that these requirements are suitably interpreted and balanced as part of the evolvement of the masterplan during the planning application process. Of particular note is Bullet 4 ‘Retention of an appropriate

This comment has been noted.

It is felt to be appropriate to ensure that a strategic gap is provided, given the borough's long term commitment to preserve the rural character of Horley.

The proposed policy seeks to ensure the provision of a strategic gap between Horley and Gatwick Airport and a landscape buffer between Horley and Gatwick Airport of at least 30m width.

Policy has been updated in line with updated evidence base

strategic gap between Horley and Gatwick Airport (Proposed Policy Approach NHE1: Landscape Protection”); and Bullet 9 “Layout to ensure no development on land within Flood Zones 2 and 3 and incorporate a buffer zone and improvements to the ditch network within the site”. It is fully accepted by Horley Business Park Development LLP that there should be equal scope to maintain the visual separation suggested by draft Policy NHE1, and to ensure that there is no built development on areas that are susceptible to flooding. These are constraints that will be incorporated into the evolving masterplan, and will be balanced with the identified strategic employment need. However, reference to the term ‘Strategic Gap’ suggested in draft Policy HOR9 requires careful consideration and interpretation. The identification of Land to the west of Balcombe Road as a location for economic development will result in an encroachment and loss of the historic “Open Setting” designation, but there will be scope to maintain this visual break between the new business park attached to Gatwick Airport and the built up edge of Horley, by distances that are comparable to the Riverside Garden Park area i.e. between 30 and 140 metres (currently identified as ‘Open Setting’ in the Borough Local Plan 2005). Given the size of the draft allocation

<p>site (HOR9), the need for strategic employment and the physical / spatial constraints (areas of flooding and open setting) – the use of the term “Strategic Gap” does not best represent the visual break that would be retained between the business park and the built edge of Horley and alternative wording should be considered. Horley Business Park Development LLP strongly support this and are committed to balancing the criterion of the draft Policy HOR9</p>		
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HOR10
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<p>I do not think the Council should safeguard land for development beyond the plan period – if it is not required to do so, and no information has been provided to suggest that there is any specific advantage to doing so.</p>	<p>National planning policy sets out that where necessary, local planning authorities should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Core Strategy also set out that the concept of safeguarded land would be investigated through the DMP. As such, to ensure a robust plan, this concept needed to be considered. The work done identified that safeguarded land would be needed beyond the plan period and proposes some potential locations. The safeguarding background paper provides further information on the process and the conclusions. It is important to note that safeguarded land is not a site allocation, any allocation would have to be considered through a subsequent local plan review.</p>	
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<p>MLS2 - MVDC notes that RBBC is considering whether land should be safeguarded for development beyond the current plan period and has invited the views of consultees on this issue. It is recognised that paragraph 85 of the NPPF sets out a framework for safeguarding land to meet longer term development needs. However, the NPPF also requires that local authorities plan to meet objectively assessed needs in full and plan strategically across boundaries, so that wider development needs can be met at a strategic level. In the event that RBBC is able to identify land which is suitable to be removed from the Green Belt at a future date, options for using that land to meet objectively assessed needs – including unmet needs in neighbouring authorities – should be fully explored in preference to safeguarding land for longer term development.</p>	<p>National planning policy sets out that where necessary, local planning authorities should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Core Strategy also set out that the concept of safeguarded land would be investigated through the DMP. As such, to ensure a robust plan, this concept needed to be considered. The work done identified that safeguarded land would be needed beyond the plan period and proposes some potential locations. The safeguarding background paper provides further information on the process and the conclusions. It is important to note that safeguarded land is not a site allocation, any allocation would have to be considered through a subsequent local plan review.</p> <p>The sites that have been identified have a number of immediate constraints including availability and infrastructure. In addition, RBBC aren't yet meeting own needs so are unable to meet those of MVDC</p>	
<p>MLS2 - This approach is supported with there being a number of potentially deliverable sites, beyond those identified as potential reserve housing sites, which can be safeguarded.</p>	<p>Comment is noted</p>	

MLS2: We do not believe other land should be 'safeguarded' for development beyond 2027. Land must not have the potential to be taken out of the Green Belt. Green Belt implies permanence. Land cannot be 'treated as though it were Green Belt' unless it is actually Green Belt. Once out of the Green Belt it is permanently blighted, will suffer continual developer pressure and will not be farmed properly. National Planning Policy Framework Para 85 says this only needs to be done 'where necessary', and the core strategy only says it 'may' be safeguarded through the DMP in this way. There is no necessity to do this in Reigate & Banstead, and it would be risky to do so here.

The Parish Council is particularly concerned about this because of the developer pressure already known on the large block of 'land East of Salfords' which was discussed at the Core Strategy Inquiry.

National planning policy sets out that where necessary, local planning authorities should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Core Strategy also set out that the concept of safeguarded land would be investigated through the DMP. As such, to ensure a robust plan, this concept needed to be considered. The work done identified that safeguarded land would be needed beyond the plan period and proposes some potential locations. The safeguarding background paper provides further information on the process and the conclusions. It is important to note that safeguarded land is not a site allocation, any allocation would have to be considered through a subsequent local plan review.

<p>MSL2 suggests that the Borough Council are looking for options to identify land beyond the plan period, 2027 onwards. Surrey County Council would welcome more clarity about how this may be articulated in regard to locations, scale and form of development and how this aligns with the approach proposed for MSL1, in regard to the prioritisation of those sustainable urban extensions already consulted on. The County Council would wish to understand how any further land or key locations could be affected as a result of this policy and would welcome further clarity and discussions following the closure of this current consultation for the Regulation 18 Development Management Plan.</p>	<p>National planning policy sets out that where necessary, local planning authorities should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Core Strategy also set out that the concept of safeguarded land would be investigated through the DMP. As such, to ensure a robust plan, this concept needed to be considered. If it is not considered then the risk is that the whole plan will be found unsound and we will not have the policies in place that are needed to support development and to support a 5 year housing supply, without which the Council could be open to speculative development in areas which may not be the most sustainable. The work done identified that safeguarded land would be needed beyond the plan period and proposes some potential locations. The safeguarding background paper provides further information on the process and the conclusions. It is important to note that safeguarded land is not a site allocation, any allocation would have to be considered through a subsequent local plan review, as such they would not be subject to any phasing considerations at this stage. We will continue to engage with SCC as part of DTC</p>	
<p>MLS2 – Taking such a long term strategic view of potential development (beyond 2027) is positive in terms of giving developers a lead on where future building opportunities may lie. It is emphasised that even at adoption of the Core Strategy, concerns were raised regarding the Council's ability to meet</p>	<p>Comment is noted - The safeguarding background paper provides further information on the process and the conclusions.</p>	



<p>Objectively Assessed Need for new housing within the Strategic Housing Marketing Area. It is vital that development opportunities keep pace with at least this level of provision in order that there is a clear response to the pressing local need for housing. There should be clear detailed criteria for assessing sites in terms of less valuable and surplus vacant land on the edges of settlements in order that they are given serious consideration in achieving this.</p>		
<p>MLS2 – The Councils approach to safeguarding for development beyond this current plan period (i.e. beyond 2027) is welcomed. Given the fact that the Council cannot meet their Objectively Assessed Need for new housing, as evidenced by the lower threshold set out in the Core Strategy, it is essential that the Council plan positively for future housing development. Providing an indication of where development may need to go in the longer term is a sensible approach that will ensure a greater supply of much needed housing in the Borough.</p>	<p>Comment is noted</p>	
<p>MLS 2 - We appreciate that the Council has to consider the situation beyond the plan period. However, already a significant area of Green Belt is likely to be lost. Reigate and Banstead is a small authority but has the highest population of all 11 boroughs. The infrastructure is likely to be unable to cope with the number of units planned to 2027. The Government should be pressured to</p>	<p>National planning policy sets out that where necessary, local planning authorities should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Core Strategy also set out that the concept of safeguarded land would be investigated through the DMP. As such, to ensure a robust plan, this concept needed to be considered. If it is not considered then the risk is that the whole plan will be found unsound and we will not have the</p>	

<p>accommodate the next level of growth outside the congested South East. If more land is safeguarded it will undoubtedly be developed. It may be a ‘head in the sands’ approach, but we consider that no more additional Green Belt land should be safeguarded for development. We are already losing too much.</p>	<p>policies in place that are needed to support development and to support a 5 year housing supply, without which the Council could be open to speculative development in areas which may not be the most sustainable. The work done identified that safeguarded land would be needed beyond the plan period and proposes some potential locations. The safeguarding background paper provides further information on the process and the conclusions. It is important to note that safeguarded land is not a site allocation, any allocation would have to be considered through a subsequent local plan review.</p>	
<p>MLS2 - backland and small developments will be key to future land supply, the aim in identifying such sites should be to benefit smaller landowners and developers and to enable them to more effectively engage with the call for sites.</p>	<p>Comment is noted - The safeguarding background paper provides further information on the process and the conclusions.</p>	
<p>MLS2 – Seeks to safeguard land for development beyond the current plan period (post 2027) in line with Policy CS3 of the Core Strategy. This approach is fundamentally flawed as it does not address the existing housing land supply issues and the housing shortfall that has been created and which is being perpetuated. Current household projections suggest that the number of households entering the borough per year is expected to rise to 867 compared to the 460 homes per annum that are planned for. In addition, the population of the borough is projected to increase by 18% in the period 2014-2027 and the number of people aged over 65 is set to increase by 40%. If this policy approach is to be adopted then</p>	<p>Comment is noted. The Core Strategy commits the Council to maintain a 5 year housing supply and should aim to exceed this where possible. Delivery to date has achieved this and the polices and the site allocations demonstrate how this will continue to be delivered. Policy DES7 sets out the approach to elderly accommodation.  In terms of safeguarded land, National planning policy sets out that where necessary, local planning authorities should identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Core Strategy also set out that the concept of</p>	

<p>more land for specialist older people's accommodation should be safeguarded as the current plan policies fail to recognise the rapidly ageing population and increasing long-term need. The council should be proactive and address their housing land supply issues during this plan period. As such this policy is not positively prepared; it ignores the existing issues and assumes that the existing policy situation endures. The policy should be removed and suitable, deliverable land should be identified now to meet the objectively assessed housing need released for housing during this plan period to reduce the overall need for the next. This would represent positive planning, would be justified as there is a demonstrable need and would be effective in increasing the borough's housing land supply. It would also make the Development Management Plan DPD be more consistent with national policy as it would represent a more sustainable form of development that responded directly to correctly assessed need.</p>	<p>safeguarded land would be investigated through the DMP. As such, to ensure a robust plan, this concept needed to be considered. If it is not considered then the risk is that the whole plan will be found unsound and we will not have the policies in place that are needed to support development and to support a 5 year housing supply, without which the Council could be open to speculative development in areas which may not be the most sustainable. The work done identified that safeguarded land would be needed beyond the plan period and proposes some potential locations. The safeguarding background paper provides further information on the process and the conclusions. It is important to note that safeguarded land is not a site allocation, any allocation would have to be considered through a subsequent local plan review.</p>	
<p>There is plenty of land around the outskirts of the village of Banstead which could be developed.</p>	<p>Comment is noted - The safeguarding background paper provides further information on the process and the conclusions.</p>	

SAEFGUARDING LAND

<p>I do not think the Council should safeguard land for development beyond the plan period – if it is not required to do so, and no information has been provided to suggest that there is any specific advantage to doing so.</p>	<p>National planning policy sets out that where necessary, local planning authorities should identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. The Core Strategy also set out that the concept of safeguarded land would be investigated through the DMP. As such, to ensure a robust plan, this concept needed to be considered. The work done identified that safeguarded land would be needed beyond the plan period and proposes some potential locations. The safeguarding background paper provides further information on the process and the conclusions. It is important to note that safeguarded land is not a site allocation, any allocation would have to be considered through a subsequent local plan review.</p>	
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<p>needs in neighbouring authorities – should be fully explored in preference to safeguarding land for longer term development.</p>	<p>allocation would have to be considered through a subsequent local plan review.</p> <p>The sites that have been identified have a number of immediate constraints including availability and infrastructure. In addition, RBBC aren't yet meeting own needs so are unable to meet those of MVDC, should you find you have unmet need.</p>	
<p>MLS2 - This approach is supported with there being a number of potentially deliverable sites, beyond those identified as potential reserve housing sites, which can be safeguarded.</p>	<p>Comment is noted</p>	
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<p>MLS2 - backland and small developments will be key to future land supply, the aim in identifying such sites should be to benefit smaller landowners and developers and to enable them to more effectively engage with the call for sites.</p>	<p>Comment is noted - The safeguarding background paper provides further information on the process and the conclusions.</p>	



MLS2 – Seeks to safeguard land for development beyond the current plan period (post 2027) in line with Policy CS3 of the Core Strategy. This approach is fundamentally flawed as it does not address the existing housing land supply issues and the housing shortfall that has been created and which is being perpetuated.

Current household projections suggest that the number of households entering the borough per year is expected to rise to 867 compared to the 460 homes per annum that are planned for. In addition, the population of the borough is projected to increase by 18% in the period 2014-2027 and the number of people aged over 65 is set to increase by 40%. If this policy approach is to be adopted then more land for specialist older people's accommodation should be safeguarded as the current plan policies fail to recognise the rapidly ageing population and increasing long-term need. The council should be proactive and address their housing land supply issues during this plan period. As such this policy is not positively prepared; it ignores the existing issues and assumes that the existing policy situation endures.

The policy should be removed and suitable, deliverable land should be identified now to meet the objectively assessed housing need released for housing during this plan period to reduce the overall need for the next. This would represent positive planning, would be justified as there is a demonstrable need and would be effective in increasing the borough's housing land supply. It

Comment is noted. The Core Strategy commits the Council to maintain a 5 year housing supply and should aim to exceed this where possible. Delivery to date has achieved this and the policies and the site allocations demonstrate how this will continue to be delivered. Policy DES7 sets out the approach to elderly accommodation.

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There is plenty of land around the outskirts of the village of Banstead which could be developed.	Comment is noted - The safeguarding background paper provides further information on the process and the conclusions.	

PHASING		
Mechanism for release of reserve sites should not constrain the delivery of housing supply Delaying the release of sites to the stage where the council cannot demonstrate supply will constrain housing delivery Restricting housing supply to the release of the AMR does not make the council flexible enough to respond to supply shortages	Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions	No change
MLS 1 - there should be a new policy confirming the emphasis in the Core Strategy for developing brownfield land first.	The Development Management Plan sit alongside the Core Strategy, as such it does not need to repeat the polices in the Core Strategy	No change

<p><b>MLS1</b> - SEH4 - Object to phasing, the site is available for development now and there is no reason why it should be held back. It is unrealistic for the LPA to maintain a five year supply of deliverable housing land relying on sites within the existing urban area, the majority of which will be windfall sites. The coming forward of windfall sites for development is impossible to accurately predict. Inevitably the constraints imposed by the development of such sites in many instances results in a less efficient use of land with lower densities compared with the certainty of the development of urban extension sites.</p> <p>The development of this site fully meets the first principle set out on page 191. It is sustainable, there are no site specific constraints or prohibitive infrastructure requirements and as the Green Belt Review concluded it only makes a low contribution to 4 of the 5 purposes for land being within the Green Belt.</p>	<p>Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions</p>	<p>No change</p>
<p><b>MLS1</b> - When a housing target has been set for an area, say Area 1, and the target is not achieved because of insufficient land, could the deficit be made up by using land in another area or its extension or must an urban extension of Area 1 be created?</p>	<p>The Core Strategy sets out a housing target of 460 homes a year which will comprise of delivery across the borough. The Core Strategy does indicate some targets for areas but notes that these are indicative and subject to detailed testing through the DMP.</p>	<p>No change</p>
<p><b>MLS2</b> - I support phased development and safeguarding land that may be required beyond the present plan period. This is essential for the orderly progress of development in successive reviews of the plans. Not to anticipate possible future</p>	<p>Comment is noted</p>	<p>No change</p>

requirements may force development on other less suitable sites.		
of the areas close to Redhill I would be in favour of the old Copyhold site to be developed for housing first	Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions	No change
considers the inclusion of a policy which provides for the allocation of urban extension sites, in the event that the Council does not have a five year housing land supply. The inclusion of a policy which ensures that land can be released is considered beneficial.	Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions	No change
Surrey County Council support the approach that should the 5 year land supply not be forthcoming , that there is as much clarity as possible for residents, stakeholders and other interested parties about where development will take place, and therefore welcome as much information regarding the prioritisation of sites within the Development Management Plan and emerging local plan documents.	Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions	No change
The Consultation Document (page 190) acknowledges that it will not be possible to accommodate the total level of planned growth within the existing urban area, despite an “existing urban areas first” policy. We would strongly urge the Planning Policy team to exploit all possible brownfield and urban sites before contemplating further urban development to the south of the Borough on Green Belt land.	Comment is noted - this is the approach that will be taken in line with the adopted Core Strategy	No change

<p>The Consultation Document states that the Sandcross Lane site and the other two urban extension sites will not be released for development until such time as it is necessary to maintain a 5 year supply of housing sites. Frankly, we are not sure what this means and would welcome clarification.</p>	<p>Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions</p>	<p>No change</p>
<p>The principles for phasing urban extension sites should include consideration of the impact on surrounding use and people.</p>	<p>Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions</p>	<p>No change</p>
<p>We continue to raise concern on the basis for the release of and phasing of the "reserve urban extension sites", in particular Hartswood Nursery, Reigate. The Core Strategy appear to suggest a sequential approach to the urban extension areas with a preference 1st for Redhill before Reigate. There is no evidence that suggests this approach is fair, reasonable or proportionate; nor does it relate to the objectively assessed housing needs across the borough (Reigate in particular) over the plan period. Although we support the DMP prioritising urban extension allocations based on factors such as relative sustainability, contribution to Green Belt purposes and any site specific constraints or infrastructure requirements. We are concerned that the Council intend to use the AMR as a means of identifying which allocated urban extension sites will be released for development and will be based on the "prioritisation" within the DMP not upon the housing needs of the individual communities. If the "prioritisation" is based upon the sequential approach of the two settlements above then this is</p>	<p>Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions</p>	<p>No change</p>

<p>neither positively prepared, justified, effective or consistent with national planning policy. The Council should set out a preferred phasing list of housing sites in the urban extension areas based upon those sites that offer the least adverse impact when assessed against the significant scale and size of other site options. i.e. Hartwood Nursery. The Council should wish to avoid the need to release larger urban extensions in the former green belt area because provisions in the Local Plan couldn't cater for supply of smaller scale housing needs before the 5 year housing supply became too great, leaving the only option of a large scale extension being released for housing.</p>		
<p>We strongly support a policy on phasing the urban extension sites and in the meantime treating the land as Green Belt. However, it is disappointing that the policy is not yet available for comment.</p>	<p>Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions</p>	<p>No change</p>
<p>May want to review clause (i) of CS3 as "Whilst it is accepted that the broad principle of examining the potential of brownfield sites first is a sound approach in response to one of the core planning principles of the National Planning Policy Framework (the Framework), which encourages the effective use of land by reusing land that has been previously developed, it should be stressed that the Framework only advocates a sequential approach in relation to town centre uses and for sites susceptible to flooding. It is not included as an approach to determine the location of housing development and</p>	<p>Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions</p>	<p>No change</p>

<p>this has been confirmed in a Secretary of State appeal decision dated July 2012 (Ref:- Burgess Farm, Worsley, Manchester;- APP/U4230/A/11/215733). In terms of Government policy, there is therefore no justification to restrict the use of this sustainable, albeit greenbelt site, on the basis of sequentially preferable sites elsewhere in urban areas, even if such sites were readily available."</p>		
<p><b>MLS1</b> – MLS1 seeks to phase development for housing in designated urban extension sites as a safeguard if and when the council fail to demonstrate a five year supply of housing land. The council identify that 1,030 homes can be delivered in “sustainable urban extensions” around the settlements of Horley, East Redhill/East Merstham and south west of Reigate. In total the council identify a requirement of 6,900 homes over the plan period, 5,800 of which are to be provided in urban areas. However, even if the maximum densities were achieved on all of the urban extension sites, there would still be a shortfall of 70 units. The site at Holly Hill would represent a sustainable urban extension to Banstead and could contribute towards the overall and specialist housing need in the borough that is presently identified but ignored. The site has been included in the 2016 SHLAA Addendum (BV15) and is identified as being available and achievable but not currently suitable as it would require a strategic policy change. It should be considered for Green Belt release now for</p>	<p>Comment is noted - see the phasing evidence paper for information on approach to phasing of urban extensions</p>	<p>No change</p>

release for specialist housing and included within the sustainable urban extensions evidence base document. Policy MLS1 should be drafted to recognise the importance and sustainability benefits of sites which are physically contiguous with built up areas, and should be prioritised accordingly wherever they may be

The proposed approach to policy MLS1 will not resolve 5 year housing land supply shortfall and will make it worse. The housing requirement of 460 dwellings per annum established in Policy CS13 does not constitute the full objectively assessed needs for housing in the Borough. Because the LPA is choosing to use figures which are significantly out of date, by definition it is not planning for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, and so is in breach of paragraph 50 of the NPPF.

Therefore there is a risk that, should a more up-to-date assessment of housing needs be undertaken, by either the Council or by an applicant / appellant as part of a planning application or appeal, a higher OAN for the Borough will be demonstrated.

In the recent High Court decision in Burghfield Common, West Berkshire it was held that in reaching his conclusion that there was not a five year supply, the Inspector determined that the housing requirement figure in the Core Strategy adopted in 2012 did not represent a robust and up to date assessment of housing need. He did so on the basis that significant new evidence in terms of



<p>population and household projections, and jobs growth forecasts was now available.</p> <p>The Judge supported the Inspector in this approach, and in particular confirmed that the Inspector was entitled to find that the developer’s evidence as to the OAN for housing amounted to “significant new evidence”, as per Paragraph ID 03-030, and justified a departure from the figure in the adopted Core Strategy. This new evidence amounted to material considerations which supported a determination that was not in accordance with the development plan.</p> <p>The decision also confirmed that the Inspector was required to identify an annual housing requirement in the District otherwise he would not have been able to identify whether the Council could demonstrate a five year housing land supply. Having concluded that the adopted Core Strategy requirement was now out of date, the Inspector was entitled to use the developer’s OAN figure.</p> <p>In light of this judgment the likelihood of applicants successfully challenging the Council’s housing supply will increase. Emerging policy MLS1 needs to identify a greater number of sites over a wider area to prevent this situation arising. This will give flexibility to delivery of the correct objectively assessed housing figure, and so avoid uncertainty with planning by appeal occurring to fill the vacuum created by a timid or overly mechanistic policy.</p>		
<p>Past council policies have been ambiguous towards brownfield land on the edges or even within settlements, and this needs to be changed when looking at longer term needs.</p>	<p>Comment is noted. The Core Strategy sets out the strategic approach to land use</p>	<p>No change</p>

**GENERAL**

CONSULTATION PROCESS		
<p><b>Consultation process</b> - website did not provide the necessary questions to make the comments I wanted to make, so had to write</p>	<p>The online survey provided text boxes for additional comments</p>	<p>No change</p>
<p><b>Consultation process</b> - The Council are legally required to hold a Regulation 18 consultation as part of the first stage in the preparation of the Development Management Plan. There has been no attempt by the council to inform its residents of this proposed site to develop, totally unacceptable. If the council wants residents on board then communication is key here which you have failed. I found out incidentally, I was told that all properties were mail dropped a notification card - this is untrue. I have spoken to a number of residents who border Oakley Farm and not one had received this card.</p> <p>It is quite apparent that consultation on this matter has been kept on a very low profile. the consultation process is wholly inadequate in terms of the number of people directly informed and there are no public notices about the proposals whatsoever</p>	<p>A postcard advertising the consultation was sent to every house in the borough. A four page pullout was included in Borough News, which also goes to every house in the borough. Posters were placed in supermarkets, libraries, and community facilities. There were articles in local newspapers. Everyone on the Council's consultation database was contacted by email or post.</p>	<p>No change</p>
<p><b>More consultation</b> - Give residents more say on new developments and local green spaces. Very little say is given to us in regards to big money making developments that cause many local problems for residents.</p>	<p>The consultation is an opportunity to have your say. All large new developments also have a public consultation period.</p>	<p>No change</p>

<p>Why consult &amp; why spend tax payers money in doing so? The questions are biased towards an 'Agree' answer when the majority of residents wish to oppose the new business park. Fundamentally local residents do not wish planning guidelines to be changed in order to allow developments that previously would have been in contravention of these!</p>	<p>A number of respondents chose 'disagree' on many of the questions, which suggests the questions are not fixed towards 'agree'. Text boxes were provided for additional comments, and many people left comments regarding the business park.</p>	<p>No change</p>
<p>All site allocations should be subject to a review and open vote among the local community before any development is approved</p>	<p>The planning system does not operate through referenda, but the local community has a chance to object to large new developments through the consultation period they must go through.</p>	<p>No change</p>
<p>I have spoken to people in the area and it is absolutely clear that a very high proportion of them have no idea of the proposals. How can that be so? The proposed developments would have seriously detrimental consequences for all those living in the area, notably those in the Reigate area, anyone living near the A217 and anyone who has to use the A217. I will come back to that later. I. There has been a complete failure to conduct the consultation at a suitable level. This failure in the consultation process absolutely must be addressed before progressing any further with the plan. Take a look at the Westvale Park development just down the road on the A217 with over 1500 homes. We knew nothing of that until the roundabout went in. I'll come back to that. Unfortunately, in our road, we do not receive the free papers so its easy to miss some local news. Only occasionally do we buy the Surrey Mirror. It may be the same for other local residents. Actually, even if you've heard about such proposals, try</p>	<p>A postcard advertising the consultation was sent to every house in the borough. A four page pullout was included in Borough News, which also goes to every house in the borough. Posters were placed in supermarkets, libraries, and community facilities. There were articles in local newspapers. Everyone on the Council's consultation database was contacted by email or post.</p> <p>The specific development you refer to is a separate issue that is not related to the current consultation.</p>	<p>No change</p>

<p>finding anything meaningful on Reigate and Banstead Council's website. It winds the user through a series of looping unhelpful pages. If you're lucky enough to find something, it will be indigestible, long and convoluted.</p>		
<p>Unfortunately, not everyone received notification of the process from the Council and the delay in the issue of the DMP meant it initially clashed with the school holidays. We feel that, the clearer the evidence is, the easier the Inspector's task should be in the Examination.</p>	<p>The clash with the school holidays was noted, which is why the consultation was held for a significantly longer period than legally required, to enable everyone to have a chance to comment.</p>	<p>No change</p>
<p>We feel that it is vital that the Council interacts with all the major groups and resident associations across the Borough collectively as many of the issues resonate across different communities as well as more rural areas. So far its approach seems designed more to liaising with each community separately and we do not think that this is productive in the longer term.</p>	<p>The Council meetings provide an opportunity for each community to discuss the plan with their representative beforehand and then have it discussed on a borough-wide basis.</p>	<p>No change</p>
<p>TNF did request a meeting with The Planning and Policy Department at the Council before compiling these comments in an effort to establish some common ground and shorten the number of comments we felt appropriate. This was declined. We find the Council's website with tick boxes and its questionnaire an inadequate way of submitting comments and reflecting concerns.</p>	<p>Comments noted. Further correspondence has been entered into with the representor on this issue.</p>	<p>No change</p>

<p>TNF was set up with proper constitutional documents as an unincorporated association from a legal standpoint but was refused recognition by the Council. It is our contention that the Council introduced conditions for recognition which we believe were outside the scope of the clear criteria for qualifying set out in The Localism Act. There are NO Neighbourhood Forums in the entire Borough (unlike surrounding areas) and they and Neighbourhood Plans have not been encouraged by the Council, the local Chairperson of CPRE nor our own Residents Association. We feel that the Inspector should be aware of this background in looking at the effectiveness of consultation, the “evidence base” and detailed policy. It may partly explain the shortlisting of the Council as an entrepreneurial council in The Local Government Chronicle etc.</p>	<p>Comments noted. Previous applications by TNF to be considered as a neighbourhood forum are not considered relevant to the DMP.</p>	<p>No change</p>
<p>Think of the local community and stop this ludicrous business park initiative. Provide the badly needed infrastructure for existing residents and stop wasting tax payers money on consultations that are worded to get an 'Agree' answer to questions when people want to OBJECT in the main to changing local planning documents that seem to monetarily advantage RBBC. The Consultation should include questions about making use of empty shops and offices in the town centre and to making the Town more attractive to shoppers and incentives to first time buyers buying older properties, not just new-builds. Also ask for opinion on local infrastructure and what can be done to improve it before new developments are even considered. Why are local GPs not taking on more patients - because they can't cope with the number of residents now and resources are already too stretched! Try calling an ambulance and having to wait over an hour and then finding</p>	<p>A number of respondents chose 'disagree' on many of the questions, which suggests the questions are not fixed towards 'agree'. Text boxes were provided for additional comments, and many people left comments on all of the other topics mentioned here.</p>	<p>No change</p>

ESH with no beds ... all too often a common occurrence.		
Lives in the road adjacent to development - disappointed to not be informed more directly about plans	A postcard advertising the consultation was sent to every house in the borough. A four page pullout was included in Borough News, which also goes to every house in the borough. Posters were placed in supermarkets, libraries, and community facilities. There were articles in local newspapers. Everyone on the Council's consultation database was contacted by email or post.	No change
These questions are worded to ensure people 'support' points in the application when the overall feeling is that they want to object to the principle of changing Local Plans to suit this particular planning submission!	A number of respondents chose 'disagree' on many of the questions, which suggests the questions are not fixed towards 'agree'.	No change
Dissatisfaction with the survey - a lot of the questions seem set up to favour a 'support' answer even in the event of serious misgivings for the council to achieve the quantitative results they need to present it as wholesale support for local development and the local plan. This must not be used by the Council to claim broad public support for their plans, and the comments part ignored. I regard the whole of this form as sinister and underhand, with cleverly disguised and loaded language leading people to misunderstand or base their comments on false understandings.	A number of respondents chose 'disagree' on many of the questions, which suggests the questions are not fixed towards 'agree'.	No change
I also object to the total secrecy that surround this proposal. I first found out about the plans from a Green Party flyer, which led me to try and find out more in the local library.	A postcard advertising the consultation was sent to every house in the borough. A four page	No change

<p>Despite the best part of an hour spent searching the Council website, I could find no information whatever. I was beginning to suspect it was a publicity stunt by the Greens until the free paper arrived. Why the secrecy? Why has no information at all been given to affected local residents? This is a massive new development, completely changing the appearance and attractiveness of the area, for the worse, and yet nobody I have spoken to knew anything about it. No doubt it is buried in documents somewhere in your offices, but this is not good enough. The suspicion must be that you are trying to sneak this one through with a minimum of information, and that stinks.</p>	<p>pullout was included in Borough News, which also goes to every house in the borough. Posters were placed in supermarkets, libraries, and community facilities. There were articles in local newspapers. Everyone on the Council's consultation database was contacted by email or post.</p>	
<p>Place snapping should be done in proper consultation with residents. This has now happened. I only found out about this today via a friend. Why haven't the Council written to us?</p>	<p>A postcard advertising the consultation was sent to every house in the borough. A four page pullout was included in Borough News, which also goes to every house in the borough. Posters were placed in supermarkets, libraries, and community facilities. There were articles in local newspapers. Everyone on the Council's consultation database was contacted by email or post.</p>	<p>No change</p>



<p>I feel that an official letter along with the 'Development Management Plan Regulation 18 Consultation Fact Sheet for Merstham' should have been put in every letter box to those who will be impacted the most, to ensure everyone gets to share their views with regard to the Local Plan, as I know there are Merstham residents who are unaware of the proposed plans. Even though we have received a postcard and there was a mention in the local borough magazine, I feel it was not highlighted enough and so local residents could have easily overlooked this Local Plan thinking they are in respect of the developments already taking place in Merstham in the Portland Drive area.</p>	<p>This comment states that you received two different forms of notification directly to your address, it is felt that this shows the Council put some significant effort and expense into alerting residents to the consultation. It is unclear how to define 'those who will be impacted the most'.</p>	<p>No change</p>
<p>It would seem that we should have had leafleted notification of this plan delivered to our home in Bolsover Grove. We have never received such notification.</p> <p>It was by chance, when talking to a neighbour, that we became aware of the existence of this plan. Talking to other neighbours it seems that none of the residents in Bolsover Grove have ever received leafleted notification of this plan. Given this omission on the part of Reigate and Banstead Borough Council and the fact that the closing date for comments is 10th October 2016 we feel that Reigate &amp; Banstead Borough Council needs to re-leaflet those people affected and allow more time for comments to be made.</p> <p>It is very unfortunate that those who will be most affected by this plan seem to have been kept in the dark.</p>	<p>A postcard advertising the consultation was sent to every house in the borough. A four page pullout was included in Borough News, which also goes to every house in the borough. Posters were placed in supermarkets, libraries, and community facilities. There were articles in local newspapers. Everyone on the Council's consultation database was contacted by email or post.</p>	<p>No change</p>

<p>Write forms in plain English and not use terms such as 'Place shaping' and allow people to express their opinions/objections as they like, not as you want it formulated, or is this designed to put people off so you get fewer objections</p>	<p>A number of empty text boxes are included in the survey for additional comments on any topic. Although the use of 'place shaping' may seem somewhat technical, the actual policies asked about under that heading should be understandable to all.</p>	<p>No change</p>
<p>i attempted to object to these as well but gave up after an evening trying to navigate your atrocious website. I would not dare suggest that you make this deliberately impossible to get around, but i am not alone in this view - which is why I have to resort to snail mail to deliver this objection. Please reconsider this proposal; and keep residents informed of what is going on.</p>	<p>More information is needed on what the actual problem with the website was.</p>	<p>No change</p>
<p>Perhaps you should be more open and inform the public of your plans instead of trying to keep things behind closed doors</p>	<p>A postcard advertising the consultation was sent to every house in the borough. A four page pullout was included in Borough News, which also goes to every house in the borough. Posters were placed in supermarkets, libraries, and community facilities. There were articles in local newspapers. Everyone on the Council's consultation database was contacted by email or post.</p>	<p>No change</p>
<p>I think the survey could have been designed a lot better. The whole survey is far too vague.</p>	<p>More information is needed in order to respond.</p>	<p>No change</p>
<p>Theme 2 and 3 - totally meaningless, there is no such thing as place shaping</p>	<p>It means the way in which we shape the places in the borough.</p>	<p>No change</p>

<p>You should ask for feedback on specific proposed developments instead of general principles.</p>	<p>Empty text boxes were provided in the survey to allow for such comments.</p>	<p>No change</p>
<p>Survey doesn't clearly relate to the information sent out by the BVRA.</p>	<p>The survey relates to the DMP document, the information sent out by the BVRA is their own interpretation of this document and is not endorsed or compiled by the Council. This issue should be taken up with the BVRA.</p>	<p>No change</p>
<p>I live close to the High Street in Banstead and have heard nothing about this until now, it seems very underhand. The proposals should have been posted to all residents. Why have you tried to keep this secret? Changes are not being widely advertised.</p>	<p>A postcard advertising the consultation was sent to every house in the borough. A four page pullout was included in Borough News, which also goes to every house in the borough. Posters were placed in supermarkets, libraries, and community facilities. There were articles in local newspapers. Everyone on the Council's consultation database was contacted by email or post.</p>	<p>No change</p>
<p>The forms are difficult to navigate. Online response questionnaire but that was far too restrictive and confusing.</p>	<p>Empty text boxes were provided in the survey to allow for additional, freestyle comments.</p>	<p>No change</p>
<p>Before decisions are made, it is essential that the Leader of the Council, the Head of Planning and the local Councillors hold an open meeting in the Community Hall for the residents to exchange views on developments that would have such an impact on the community.</p>	<p>A number of drop in sessions were held at local libraries, with local councillors and members of the planning team, available for all to attend.</p>	<p>No change</p>
<p>if you use agreement with the general principles, as agreement to the plan that would be a misrepresentation.</p>	<p>Noted. Empty text boxes were provided in the survey for more</p>	<p>No change</p>

	detailed comments.	
I did not receive the postcard.	We apologise.	No change
Having just visited Banstead Library to view the advertised exhibition I was informed that it had been removed and there was only a folder to look through. This was very difficult to read and to find any details about Banstead.	The exhibition was in Banstead Library for two weeks, but after this it had to be moved to other parts of the borough to allow others an opportunity to see it.	No change
The planning department has to our knowledge not obtained the views or taken a survey of the local people to the proposals before putting them into print.	The consultation is the opportunity for local people to express their views - if there were no proposals printed, people would not have anything to express their views on.	No change
The views of the residents should be consulted to gain an opinion of what shops would be most useful to them in the future.	The consultation is the opportunity to provide such views.	No change
It is hard to write an informed letter regarding the Development Plan since there are so many discrepancies between the Borough news, the library exhibitions and the plan itself.	It is unclear what these discrepancies are.	No change
The comment forms from R&BBC were not supplied in sufficient quantity, running out of stock in the process.	The forms were also available online, and an attempt was made to keep them restocked at the libraries as often as possible.	No change
It has been difficult to absorb such a wordy and complicated document in such a short time before the deadline. Not easily commented upon by the layperson. I have a degree level education and struggled to get through the convoluted wording and marketing jargon.	Noted. Shorter fact sheets were also produced and made available at drop in sessions and online to try and aid understanding.	No change
Should have waited until after Gatwick decision to run the consultation, as this would change the approach.	Noted.	No change

What is the process planned by RBBC during the next period up to Spring 2017 when the “draft” final DMP is issued for consultation? It is not clear whether the Council’s DMP team intend to engage directly with representatives from the Banstead community throughout these intervening months.	Engagement has continued primarily through local councillors in the intervening months.	No change
I would like to suggest that Reigate and Banstead Borough Council give the people of Banstead Village a referendum.	The planning system does not operate through referenda.	No change
In relation to Horley town centre: The maps on the document are very unclear. The road names and buildings are difficult to differentiate from each other.	Noted, future maps will try to improve on this.	No change
The tick box approach of the survey was ambiguous and made it difficult to fully express views.	Empty text boxes were provided to allow for open comments.	No change
There should have been more, and better consultation with local people about proposal HOR9 before it ever got to this stage.	The consultation stage was quite an early part of the process, and was the opportunity for residents to make comments on the proposal. If the proposal had not been at least somewhat fleshed out, there would be nothing to comment on.	No change
Concern that the Council has used consultants to produce the documentation.	It is unclear why this would be a problem.	No change
Concern that the fact sheet maps do not show separation or scales and that the lack of detail is intentional.	Noted, future maps will try to improve on this.	No change
No key councillors were in attendance at library exhibitions.	Councillors attended some drop in sessions at libraries where possible, but this was not always possible due to their schedules. This would be an issue to take up with individual councillors rather than the planning policy team.	No change

<p>During our visit to the DMP drop in session at Horley library on the 27/9/16, we met a resident of Ringley Avenue who told us that during the last election campaign, a Borough Councillor had informed her that the tenants of Bayhorne Farm were formerly the owners and had “sold out to the Council”. The resident then went on to say that the Councillor had said that the “tenants of Bayhorne Farm had sold out to the Council so they had no right to object to or complain about the potential business park development”. The same incorrect information was also given to residents of Avenue Gardens when two Borough Councillors attended a residents meeting to talk to about the business park proposal. Surrey County Council is the owner of Bayhorne Farm and Taylor Wimpey own Fishers Farm. The current family have been the tenants of Bayhorne Farm since 1923 as the historical records and tenancy agreements show.</p>	<p>This is an issue that should be taken up with the councillors in question.</p>	<p>No change</p>
<p>I feel that all those pushing this plan forward should be made to go down to the houses, farms, businesses and lands. They should meet the people, face to face, and see for themselves what this is doing to those families, livelihoods, relationships and health.</p>	<p>The Council has limited staff resources for such an action. Decision in planning policy are made on the basis of lots of carefully collected evidence, and the borough must plan to meet its housing targets or risk developer led development.</p>	<p>No change</p>
<p>The leader if the Council set up the ‘Horley Consultative Group’ to seek residents views about all of the major developments in Horley, as a Borough Councillor said in an email sent on the 13/1/16 “A Consultative Group comprising Horley residents from across the three Horley Wards is being established to ensure that the whole of Horley is involved, and all issues openly and transparently addressed, on all the major development initiatives in Horley, of which</p>	<p>Comments noted. Further correspondence has been entered into with the representor on this issue.</p>	<p>No change</p>

<p>the potential business park is one.” However the group was not open or transparent. It did not represent the whole of Horley as promised. Only 6 people were invited, only 3 could attend, and all others excluded. A Freedom of Information request about the agendas and minutes for these meetings was declined because the leader of the council held them as ‘informal’ meetings.</p>		
<p>These aren't questions; they are just statements looking for consent.</p>	<p>Empty text boxes were provided to allow for open comments, and a number of respondents chose to disagree with many of the objectives, suggesting that they form was not fixed to gain consent.</p>	<p>No change</p>
<p>What research and work has been carried out, and by whom, to support your proposals, as local residents we have certainly not been consulted.</p>	<p>A large evidence base was created to support the proposals and made available online. Residents were consulted in the consultation to which this comment is a response.</p>	<p>No change</p>
<p>The plans proposed for Banstead are not detailed enough and were presented at Banstead library by people who did not even know the local area.</p>	<p>It is unclear what additional detail was needed.</p>	<p>No change</p>
<p>The changes to the DMP are only being made because the existing DMP would not allow proposal HOR9 to take place.</p>	<p>The Council has a legal requirement to put an up to date local plan in place, otherwise development in the borough will take place by appeal rather than through advance planning.</p>	<p>No change</p>

POLICY PROCESS		
Before the document is published, near the front page there needs to be a list of all the acronyms that have been used.	Noted.	A glossary will be included in the final document
The objectives are all very worthy so no one is likely to disagree with them. The difficulty is balancing different interests and working out which will take priority over others - most of these are contradictory. Also, I would like to hear more about the detail of how these objectives will be met and the cost of doing so.	In terms of cost, many of the policies in the DMP are implemented through the creation of new development, which is how they are paid for. It is noted that planning requires a careful balancing of different objectives, although the comment is not specific about which aspects are contradictory.	No change
Still awaiting reply to letters sent in 2004 and 2006. Residents do not require a DMP, they require answers to the increased flooding issue in this area as a result of decisions made by the Council / SCC.	An up-to-date local plan is required if planning in the borough is not to take place through appeal. Realistically, you are now unlikely to receive answers to letters sent 13 and 11 years ago, and almost all of the Council's personnel will have changed between now and then.	No change
<b>Saved policies</b> - After this Local Plan is adopted there is no justification for any more saved policies. The Local Plan for Reigate & Banstead should consist of the Local Plan Part 1 (Core Strategy) and the Local Plan Part 2 (Development Policies). There should be no other policies hanging over from the pre-NPPF based regime. There should be no other policies waiting to be updated via the production of a part 3 local plan.	A local plan part 3 is not proposed. The Core Strategy does commit to a review of the Core Strategy in 2019, but it is important that documents continue to be updated to reflect changes to local circumstances.	No change



<p><b>Plan content</b> - I found the plan so theoretical/generic as to be of limited value. A large number of the potential development sites seem to be in private hands and it is unclear if, how and when they could be made available. If they are not made available the potential use is not deliverable.</p>	<p>All sites have been thoroughly evaluated and are believed to be realistically available during the plan period.</p>	<p>No change</p>
<p><b>Plan content</b> - I found this process insulting. I am a well educated and intelligent professional and I found the vastness of the consultation document staggering, not to mention the ridiculously confusing language. This has been done deliberately to prevent people from making valid and constructive arguments against what you want to do. It disgusts me as a council tax paying local person from birth</p>	<p>It is unclear exactly what aspects of the language were confusing. It is accepted that the document is long but it has to be to deliver the detail required. A number of individual topic and area fact sheets were produced to assist with understanding.</p>	<p>No change</p>
<p><b>Plan content</b> - the plan doesn't strike the right balance between the "growth" and "preservation" agendas; there is too much emphasis on growth and too little on preservation. I get the sense that the "bigwigs" in the centre of the Borough are happy for all the unpleasant development to be sent to the more far flung areas of the empire so they don't have to live with them!</p>	<p>Redhill is one of the areas with the most proposed development, and this is in the centre of the borough. The DMP aims to preserve as much as possible, whilst delivering the housing in line with need, as set out in the adopted Core Strategy.</p>	<p>No change</p>
<p>Our main concerns relate to the restrictive parking proposals and lack of resources to finance the infrastructure, particularly transport, to serve proposed development. We are also concerned at the lack of information on such matters as affordable housing and the locations of green corridors, but assume matters such as these will be included in the Regulation 19 stage document.</p>	<p>The points are noted. Policy INF1 deals with infrastructure, and the money for this infrastructure is expected to come from agreements with developers and the Community Infrastructure Levy. Affordable housing is now covered by Policy DES7.</p>	<p>No change</p>

<p>Pages 7 – 10 Summary of proposals and options - It would be helpful to have page numbers against the policies in the final draft.</p> <p>It is difficult to comment on some topics as the policies have yet to be published. Our main concerns relate to the lack of infrastructure to support the new development and the inadequacies of the parking standards.</p>		
<p>Sheltered housing and bungalows for the increasing elderly population.</p>	<p>Accommodation for the elderly is now covered in Policy DES8.</p>	<p>No change</p>
<p>A policy of restrictions on what businesses are allowed to open in the area. A policy similar to that used at Northcote Road, Clapham Junction is recommended.</p>	<p>Policy RET2 provides some guidance as to the mix of use classes that will be expected within town centres, in order to maintain them as interesting and viable locations.</p>	<p>No change</p>
<p>More detailed consideration of air pollution issues, particularly with regard to the congestion on the A217.</p>	<p>This is covered by policy DES11.</p>	<p>No change</p>
<p>Are there going to be other leisure facilities such as a cinema or bowling complex?</p>	<p>No additional leisure facilities beyond those mentioned in the DMP document are currently planned, but proposals could be brought forward by a private developer and be subject to a normal planning application procedure.</p>	<p>No change</p>
<p>Cover why the core strategy keeps changing - and justify it.</p>	<p>The Core Strategy does not keep changing, although changes may be made when it is reviewed in the next few years.</p>	<p>No change</p>

<p>Land at Mill Lane, Merstham should be allocated as an SUE.</p>	<p>The process of SUE allocations has involved a lot of analysis and evaluation of different sites, and it is believed that the proposed sites are the correct ones to put forward.</p>	<p>No change</p>
<p>Design standards and guidelines- other councils are doing this, because whilst the level of investment is great, the design is pastiche at best.</p>	<p>A parking and design Supplementary Planning Document is proposed. There are also a number of existing Supplementary Planning Documents available on the Council's website to guide design - see here <a href="http://www.reigate-banstead.gov.uk/info/20085/planning_applications/28/supplementary_planning_documents_and_guidance">http://www.reigate-banstead.gov.uk/info/20085/planning_applications/28/supplementary_planning_documents_and_guidance</a></p>	<p>No change</p>
<p>Provision of a health centre with drop in facilities for minor surgical procedures to replace future loss of Epsom and St. Helier and Sutton General A&amp;E departments.</p>	<p>It has long been recognised that Epsom Hospital and St Helier Hospital buildings are no longer fit for purpose. The Epsom and St Helier University Hospitals NHS Trust, along with other NHS services and public sector organisations, recognises that both the needs of residents, and the way healthcare is provided, are changing, and that it needs to be able to respond to these challenges. The Trust recently consulted on three possible options for service delivery over the period 2020-2030..All three options included both Epsom and St Helier hospital being rebuilt to deliver a full range of local services, with acute healthcare facilities proposed in one of the three locations (these two or Royal Marsden in Sutton).</p>	<p>No change</p>

	None of the proposed locations for local services is within Reigate and Banstead borough.	
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MISCELLANEOUS		
The need for more housing is clear but development on such a big scale will not be welcomed by the vast majority of local residents in these areas.	The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base. The generation of planning policy is independent from other departments in the Council, and uses the evidence base to create objective policies. Including the Core Strategy as well as the DMP process, there have been several rounds of public consultation.	No change
A comprehensive analysis of the empty housing in Redhill should be drawn up and published(rooms and beds). Also the available non green belt locations in town thoroughly inspected to encourage developers.	A brownfield register will be published later this year which will list all available brownfield sites	No change

<p>May want to review clause (i) of CS3 as "Whilst it is accepted that the broad principle of examining the potential of brownfield sites first is a sound approach in response to one of the core planning principles of the National Planning Policy Framework (the Framework), which encourages the effective use of land by reusing land that has been previously developed, it should be stressed that the Framework only advocates a sequential approach in relation to town centre uses and for sites susceptible to flooding. It is not included as an approach to determine the location of housing development and this has been confirmed in a Secretary of State appeal decision dated July 2012 (Ref:- Burgess Farm, Worsley, Manchester;- APP/U4230/A/11/215733). In terms of Government policy, there is therefore no justification to restrict the use of this sustainable, albeit greenbelt site, on the basis of sequentially preferable sites elsewhere in urban areas, even if such sites were readily available."</p>	<p>Policy CS3 is part of the adopted Core Strategy, which is expected to be reviewed in 2019. However, there is an obvious justification for not building on green belt sites immediately, which is that they are in the green belt and have not yet been released from it. It is believed that there is nothing in national policy that stops a phased release of green belt land in order to focus on brownfield sites first and protect green belt land.</p>	<p>No change</p>
<p>Redhill - You cannot get rid of the smell from the landfill site.</p>	<p>The landfill site will be covered before development takes place, and specific odour issues will be considered when a planning application comes forward.</p>	<p>No change</p>
<p>Developers naturally want the large projects, which are easier managed, and much more profitable than running a number of smaller sites. Consent for the larger developments must be tied to the same developer building on the brown field sites available.</p>	<p>There is no legal or national policy basis allowing us to make this a requirement. Instead, the DMP aims to encourage developers to focus on urban sites first by allocating them, and by only releasing larger sites as and when they are needed to meet the five year housing land supply.</p>	<p>No change</p>

<p>However I feel there has been too much in this area and have seen similar in Worcester Park, which although has increased house prices, I feel would have happened anyway but area looks too crowded and feel we are going the same way and will lose the community and village feel which is what we all love about Tadworth and Walton. We pay our taxes but are the forgotten town when it comes to maintaining our community, unlike Banstead or Reigate!!!</p>	<p>There are no sites allocated in the DMP for Tadworth and Walton, so it is unclear how the plan increases crowding in the area. Individual planning applications will be assessed on their merits as they come forward, and can be rejected for cumulative impact on the local landscape or the amenity of neighbouring residents.</p>	<p>No change</p>
<p>Gatwick - As long as we leave space around Gatwick to allow it to expand that is key. We do not want or need another hemmed in airport like Heathrow.</p>	<p>Noted.</p>	<p>No change</p>
<p>Gatwick - GAL wishes for it to be noted within the DMP consultation that if a second runway development were to be permitted by Government in the future then GAL considers that the Core Strategy and DMP would need to be reviewed.</p>	<p>Noted</p>	<p>No change</p>
<p>Gatwick - New runway at Gatwick will necessitate a separate policy statement</p>	<p>Noted</p>	<p>No change</p>
<p>Gatwick - Gatwick should not be allowed to expand - a second runway is a nightmarish possibility. Further noise, and further congestion would not assist the area's environment - which is recognised as being 'nice', and worth holding onto in the Plan. Local infrastructure/roads/amenities would not cope. Traffic is already ridiculous in the immediate area, and the wider area, and it cannot realistically be improved. Space is at a premium....rather obviously....</p>	<p>Gatwick Airport is within Crawley Borough Council, it is not a decision Reigate &amp; Banstead Borough Council will make. However, it is recognised that should an additional runway be proposed that RBBC would need to update their policy to reflect this</p>	<p>No change</p>

<p>Horley -I am happy to be living in Horley and feel the balance of houses, businesses and open spaces is about right. We change it at our peril</p>	<p>The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base, and aim to maintain a good balance between housing, business, and open space, while accepting the need to meet housing targets.</p>	<p>No change</p>
<p>Horley - Horley is set to become a site of a LOT of housing with no money spent on facilities and is getting a raw deal compared to the rest of the borough. We want some of the key ticket items like cinemas etc to come here. We currently have an issue with teenagers disrespectful and also with drugs come on r&amp;b lets do something about it and not just be a survey you over spent on a few years back.</p>	<p>This website provides information on what has been done in Horley to date <a href="http://www.reigate-banstead.gov.uk/info/20326/horley">http://www.reigate-banstead.gov.uk/info/20326/horley</a></p> <p>Things like cinemas are largely market driven, however we have identified in some of the site allocations that leisure would be supported.</p>	<p>No change</p>
<p>Horley - Horley seems to have been neglected for a number of years (either that or poor planning decisions). There are signs that there is re-investment coming but I'm not convinced that it can any longer be called a self sufficient community it's become more a commuter town.The principles in the document read well but unfortunately I don't trust that they will be carefully put into practice. Little tweaks without long term thought appear to be pushed through and implemented to tick boxes now but cause problems later seem to be the trend which is a shame. The potential of a massive new business park and second runway should be exciting for the area but I can see the infrastructure in the area not being able to support it hence leaving the business park struggling to attract (or quickly losing) businesses.</p>	<p>In Horley, the DMP focuses largely on the town centre, encouraging redevelopment that would bring people back into the centre and reduce the 'dormitory' feel of the town. In addition to this, there will be some housing on the outskirts, and a business park, but these large developments will need to provide suitable infrastructure to cope with increased traffic and population.</p>	<p>No change</p>

<p>In many ways some of your proposals are a 'wish list' as they involved sites and properties over which Borough has no current involvement or responsibility</p> <p>From talking with officers at the Horley Library session I did not gather that the DMP recognises current government thinking with associated political 'noise' for increase house building including construction on green belt spaces</p>	<p>The policies in the DMP are there to provide a consistent structure to assess planning applications with. Designations are informed by a detailed evidence base and are protected as appropriate. Site allocations are where development is considered most appropriate, all of the site allocations (apart from opportunity areas which is where we would encourage development to happen) have been promoted for development meaning the landowner is likely to bring them forward. It is not clear to what extent the DMP does not accord with government thinking - it is considered the document is in line with national policy which is what is required</p>	<p>No change</p>
<p>I believe land and views of greenery is precious and the reason many residents don't just live in Crawley and Croydon. This should be protected or the community should be getting a good amount of ancillary services/benefits for any development. Given the general drift out of London harsh views should be taken on expected service utilization to prevent it being likely outstripped. I believe people move to places in this area and settle for a reasonable amount of time - it isn't just about the 500 extra small abodes and how that extra demand is managed but where do those people move out to - where are the extra 3/4 bedroom houses to support that the growing families that might sprout out of it.</p>	<p>The DMP policies aim to provide a mix of house sizes, both large and small, to support the different needs of different people. The DMP aims to protect green space wherever possible, while recognising that in some cases it may need to be used for housing.</p>	<p>No change</p>
<p>In terms of housing need, underpinning some of the proposed DMP policies, the Council may wish to reassure itself that long term migration patterns as well as the shorter term 2012-based Subnational Population Projections (SNPP), which underpin the</p>	<p>Noted. Housing need was agreed during the Core Strategy process, and is believed to still be accurate.</p>	<p>No change</p>



<p>standard CLG household projections, are considered.</p>		
<p>Maybe a bit more focus on what the local residents would like for their town centres - it seems to be ideas from 'up above' and not much feeding up from 'grass roots'. Myself, I feel Redhill does not need a 6 screen cinema as there is a cinema at the Harlequin and 1 in Reigate. I am keen for more shop variety and more restaurants. However, I am aware that both of those things will attract more people and more cars.</p> <p>I think a key objective for the DMP is provision of town centre parking not only to service those shops and other amenities but also the new residents of the town centre</p> <p>Another objective - longstanding as it is - should also be the integration of Redhill station 'into' the town. Much of the congestion is caused by people crossing the roads to walk into town - I know there have been a number of failed suggestions but maybe we just have to take a punt and see what happens? How about a pedestrian bridge with escalators at either end?</p>	<p>The DMP aims to strike a balance between revitalising town centres without making them overly congested. A number of the proposals are for mixed use developments in town centre areas, where residents will be less likely to need cars. At the same time, the plan tries to maintain some car parking in town centres to allow for people coming from outside of the town.</p> <p>In terms of Redhill station, there is currently no proposal for an underpass or overpass, as this is not seen as an infrastructure priority for the borough.</p>	<p>No change</p>
<p>No more housing developments off Nork Way ! No more selling off the large gardens in the Nork area for development . No more builders in Nork we re fed up with it ! its been ongoing for years</p>	<p>This is not something that we can restrict but the DMP does include policies which seek to ensure any residential garden land development are designed appropriately</p>	<p>No change</p>
<p>Prevent any council tenants /homeowners from pulling down hedges that have been longstanding in the Nork area. (Theyre pulling down hedges and replacing with fencing )</p>	<p>Unless hedges are protected then we are not able to stop occupiers removing hedges on existing properties. The DMP includes a policy that new development should retain important features where applicable, which can include hedges.</p>	<p>No change</p>

<p>10 Redstone Hill, Redhill: I am concerned that this has been left vacant for many years and is being allowed to deteriorate with broken/open windows, etc. etc. Can you advise what is being done about this house? It seems that it could be converted into flats whilst retaining the existing exterior to the house.</p>	<p>Currently, there is planning permission to demolish the existing house and put up a new apartment building. However, the site is within a conservation area, so any new development here will need to be in keeping with the character of the area, rather than an 'eyesore'.</p>	<p>No change</p>
<p>Reigate - crying out for a leisure centre of its own with pool.</p>	<p>Noted, although this would require a developer interested in providing these things to come forward.</p>	<p>No change</p>
<p>Reigate - does not seem to need protection, It has been and still is a prosperous and beautiful town - it does not need to be developed further just for the sake of it.</p>	<p>The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base</p>	<p>No change</p>
<p>Reigate - you will create a diverse community, which the people of Reigate would not appreciate, people live here because it is a quiet suburb Town/village.</p>	<p>The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base</p>	<p>No change</p>
<p>Reigate, Redhill and Merstham - We are concerned at the loss of so many small industrial units and sites containing community facilities, without guarantee that alternative locations can be found.</p>	<p>While a number of sites with community facilities have been identified in the DMP allocations, these will not go ahead unless it can be demonstrated that an alternative space for the facilities has been secured, or space will be provided for them on the redeveloped site.</p>	<p>No change</p>
<p>Self reliant communities need more than just houses just packing a lot of houses into a small space doesn't work (Horley Acres). If you have lots of houses and few places to work and no services people will go elsewhere for work and pleasure (which is currently happening). 1) Parking costs are too high 2) Not enough shops, services or open spaces to attract people back to the town.</p>	<p>Noted, and the DMP sets out numerous allocations for mixed use schemes in town centres, and for employment sites across the borough.</p>	<p>No change</p>

<p>Suggest - Policy required as to how you will deal with new telecoms masts (see SC !) especially in the South and South West or Reigate part of the proposals.</p> <p>Policy required as to control of, or withholding permission for, the construction of mobile communication masts asserted by telecoms businesses as being necessitate by new developments</p>	<p>Policy EMP7 covers masts.</p>	<p>No change</p>
<p>Suggest - Policy required as to how you will deal with footpaths affected by the proposals.</p>	<p>Public rights of way are protected by law, and footpaths in general are protected by policies that require safe pedestrian access.</p>	<p>No change</p>
<p>Tadowrth Mill: Presumably this marks Tadworth Mill, an iconic feature of the history of Tadworth situated on private land (Millfield) and largely obscured from public view by the owners of the property - it is Grade 2 listed and should be made visible to the public</p>	<p>It is unclear exactly what element of the plan this refers to, but it should be noted that listed buildings do not necessarily need to be made visible to the public, and the council could not force private landowners to make it so.</p>	<p>No change</p>
<p>Tattenhem Lodge: an Art and Crafts building locally listed but in need of TLC and the grounds are a mess.</p>	<p>This is noted, but not something that is dealt with by the DMP process.</p>	<p>No change</p>
<p>The Borough sits within the 'Wandle Valley' Coordination Corridor extending southwards from London. These corridors are recognised in Policy 2.3 of the London Plan for the co-ordination of planning and investment. Also within this context, it may be useful to explore relevant economic linkages with south London further. It may also be useful to understand your consideration of land for industry and logistics and the role this may play within the wider area.</p>	<p>This is noted, although there is limited information on this coordination corridor beyond the specific London Plan policy mentioned.</p>	<p>No change</p>

<p>There is a lack of planning expertise within the Borough's planning department which has led to the overdevelopment of single houses into large mansions within the Borough destroying the existing pleasant aspects with consequent pressure on drainage systems leading to flooded roads and open spaces. The strategy of land management needs to be better thought through, it is no use looking for potential sites for development without having a plan to manage what exists, which is more than adequate to cope with current and potential future development</p>	<p>The borough needs to provide a significant amount of additional housing in the plan period to meet government targets, currently existing development is not adequate to meet these targets, no matter how well managed.</p>	<p>No change</p>
<p>Town is prosperous with low unemployment but heavily congested and overcrowded, could make the Town unliveable and downgrade quality of life. The council should make these points forcefully to central govt, which seems to see everything through a London prism. Is Mr Crispin Blunt MP engaged on this issue?</p>	<p>It is unclear how requiring additional housing in a busy part of the southeast constitutes seeing everything through a London prism. It is not felt that the towns of the borough are overcrowded at this point, and although congestion is an issue, all new planning applications will need to demonstrate that they can deal with this issue and not worsen congestion.</p>	<p>No change</p>
<p>My objections are more general, it seems to me that the council allow more houses to be built, then build more industrial units to provide work for the people in these houses, then more houses are built for people working in local industry followed by more industry, this could go on until the whole borough is covered in concrete, where is the quality of life? What is wrong with maintaining the status quo?</p>	<p>The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base. Notably, almost 69% of the borough is currently green belt, rather than covered in concrete.</p>	<p>No change</p>
<p>We would have liked to have seen a statement against both a second Gatwick runway and the expansion of Redhill aerodrome in this draft document. We suggest new policies in the final document.</p>	<p>Gatwick Airport is within Crawley Borough Council, it is not a decision Reigate &amp; Banstead Borough Council will make. However, it is recognised that should an additional runway be proposed that RBBC would need to update their policy to reflect this.</p>	<p>No change</p>

<p>Windfalls - We understand that the maximum number that the Government accepts is currently 50/year. This is low compared to what has regularly been delivered in the borough. We note that a figure of 75/year is used in the Reigate and Banstead Housing Monitor.</p> <p>On this basis we propose that the Council should request that the government approve a higher figure from permitted development, and survey office landlords so that the most likely office-to-residential conversion sites are included in the SHLAA.</p>	<p>Neither the NPPG nor NPPF say that there should be a limit on the number of windfalls. Instead, paragraph 48 of NPPF says that 'local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens'.</p> <p>When determining the windfall allowance for the Core Strategy (50 dwellings per annum), the Council excluded any allowance for office to residential permitted developments as they had only been recently introduced, were temporary and the future impact was unknown. The Core Strategy Inspector recognised that information available to him suggested that a significant addition to the first five years of windfall supply was likely as a result of the temporary office to residential permitted developments. When the permitted development became permanent, and based on trends within the borough, it was felt that there should be an increase in the windfall number. The 25 dwelling is a conservative number reflecting current trends in office to residential permitted development rights in the borough and approaches undertaken by other authorities.</p> <p>It is felt that incorporating an allowance is the most</p>	<p>No change</p>
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	appropriate approach going forward.	
you have nothing in report that reflects on vibrancy of redhill in particular i lives locally am bit of expert on this stuff no vision here at all sorry ..i have to reports so know how much takes happy to talk to anyone but this is shite	The DMP focuses on town centre sites in Redhill to try and increase the vibrancy of the town through mixed use developments. Also, there's no need to be rude.	No change
We should build an underpass in the town centre to reduce congestion	Noted, but unclear exactly what difference this would make, and it is worth noting that underpasses tend to be unpopular and underused.	No change
The whole plan is chasing the sacred cow of economic growth which is causing a housing crisis, an energy crisis, and problems with factory farming and declining fish stocks - we should push back against all development, rather than encouraging it.	The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base	No change
The underlying reason for needing this plan is the increase in population in the UK, and opposing this plan is the only outlet to oppose this population increase.	The policies, designations and site allocations in the DMP have been informed by our adopted Core Strategy and national policy and are all supported by a detailed evidence base. Reigate & Banstead Borough Council cannot really control national population increases.	No change
3. Reopening of the arches on Three Arch Road	Comments noted. Further work is underway outside of the Development Mangement Plan to explore how the Three Arch Road junction can be improved.	No change
As outlined in Section 2 of the enclosed submission report, based on the Council's approach to identifying sites that are suitable for release from the Green Belt subject to a lack of five year housing supply being demonstrated, should a more up-to-date assessment of housing need be undertaken by applicants / appellants, the likelihood of applicants successfully	It is believed that Policy MLS1, that focuses on the phased release of greenbelt land for sustainable urban extensions, is robust and will ensure that land is released in the prioritised order. Releasing sites from the green belt at the beginning of the DMP plan period, even those considered to be more sustainable, would go against the policy of focusing	No change

challenging the Council’s housing supply will increase. This could result in sites coming forward in a less than preferable sequence which could conflict with the priority order set out in Policy CS6 of the Core Strategy.

Therefore we consider that in order to manage this risk and to ensure that sites come forward in the priority order envisaged in Policy CS6, we recommend that the Council releases the most suitable sites for development from the Green Belt as part of the DMP (i.e. without the need the demonstrate a lack of five year housing land supply). This would encourage the most suitable sites to come forward in the short term to ensure that the Council is able to demonstrate a robust five year housing land supply and defend against more speculative (and potentially less suitable) sites from coming forward first.

However, notwithstanding this view, based on our assessment of the land south of Darby House in Section 3 of the enclosed report, we consider that the land to the south of Darby House is one of the most suitable sites for release from the Green Belt, particularly when compared against other options located to the east of Merstham. The site makes a limited contribution to the Green Belt and in the absence of any significant constraints or requirements for infrastructure improvements, should be prioritised for release from the Green Belt.

The site is capable of delivering between 25-30 homes and can be brought forward in full within two years and can make a positive (and quick)

on brownfield sites and urban land first. It is believed that the five year housing land supply in urban areas exists and should be met first, before looking at urban extensions. The specific site referred to in this representation is part of urban extension ERM4, and it is believed that the same concept applies here as to the other allocated urban extensions, and that it should be released in line with policy MLS1 only.

<p>contribution to the Council's five year housing land supply.</p>		
<p>No more Sainburys or supermarket developments in our area please! We have enough here and there is always on line shopping!! Too much money and time wasted by the local authority and strong community objection to it - I was aware Kingswood Road parking was changing (suspiciously to benefit Sainsburys although this was denied) but when that did not proceed, nor did the parking!!??</p> <p>Towns made easier to get around with parking and lower cost, less red lines and looking friendlier with greenery and police made more available/presence.</p> <p>Nicer high street, not neon flashing signs.Rates need to be more reasonable to keep the independent shops there to being with otherwise one high street looks like any other.</p>	<p>The issues of police and business rates are not applicable to the Development Management Plan. Policy DES1 calls for appropriate landscaping of new developments, which could include extra greenery in town centres. Policy TAP1 deals with parking policies - generally speaking, town centres should aim to be walkable and pedestrian friendly, rather than prioritising cars, but should also provide enough parking to make access easy to all. Policy DES12 controls advertisements and puts some restrictions on the use of illuminated signs. In terms of supermarket developments, these will only come forward if a retailer believes they will be a viable, profit-making opportunity - and in such cases, there must be a demand for them. If there is no demand, there will be no additional supermarkets.</p>	<p>No change</p>



<p>While we have sympathy with the Council with the competing pressures it faces, we feel the DMP needs a lot more work on the overall principles and detail and input from local communities - particularly regarding the evidence base which is flawed and needs clarification. Certain policy wording would benefit from tighter drafting to prevent any misunderstanding. look at the Croudace development in the Preston Estate aka a Regeneration Area. The fear is that villages (albeit expanded ones) like Tadworth, Walton, Banstead and Horley could be dealt with in the same manner. For instance in Tadworth they keep resurfacing the roads or putting in utilities and the Council now want to extend the “town centre” in Tadworth, Walton and Banstead without alleviating parking problems and without any small business initiatives in Tadworth. TWRA has also failed in their stated intention at the AGM to do so in Tadworth.</p>	<p>No detail provided on how the evidence base is flawed, or how input from local communities could improve it. There is no intention to build large amounts of housing in Tadworth or Walton, and the 'local centre' in Tadworth, as it is described in the plan, is not extending to any degree that would require significant additional parking beyond that which would be provided as part of new developments.</p>	<p>No change</p>
<p><b>Community assets</b> - Borough wide there is potentially a huge loss of community facilities owned by SCC/RBCC including community centres (Banstead etc.), youth centres (Merstham), libraries (Banstead, Reigate, Horley and Merstham), police stations and car parking (Banstead - 2, Reigate at the Town Hall and Marketfield, Horley) etc. Generations of ratepayers have paid for these assets and their refurbishment - Banstead library was only recently upgraded at some cost.</p>	<p>In every case, there is either the intention to replace the community facility, or the community facility is already expected to be closed or moved by the relevant organisation, leaving a vacant building. The exception to this is some of the car parks, although these are not really considered community facilities in the same manner as a library or youth centre. In the case of parking, town centres should be encouraged to prioritise sustainable transport modes, while still maintaining enough parking to support those who need to drive.</p>	<p>No change</p>

Also salt bin....my husband called to get ours fixed in the street and calls to get these filled.....these should be checked.	This is not applicable to the Development Management Plan	No change
More done to recycle more materials....other local authorities are able to recycle other materials and B&R council do not.	This is not applicable to the Development Management Plan	No change
They have dog bins in Walton High Street but not in Tadworth village or anywhere else in this dog friendly area, where everyone comes to walk their dogs!!	This is not applicable to the Development Management Plan	No change
Could have made the verges much neater but cutting them and shaping before chucking that stuff down. We cut our own verges as only get cut twice a year and are to the knee before this happens.	This is not applicable to the Development Management Plan	No change
Better roads, pot holes that are patched are awful and don't fix the problem.!	Surrey County Council are responsible for improvements such as these - more information can be found on their website <a href="https://www.surreycc.gov.uk/roads-and-transport">https://www.surreycc.gov.uk/roads-and-transport</a>	No change
There needs to be urgent attention to the pavement on Tower road at the Chinthurst School end as when it rains it floods the pavement and the Chinthurst children are forced to walk on an ill lit road ! Speed camera outside Chinthurst school before someone is killed !  I've been wondering when, if ever, the disgraceful pavements which are lethal with people having falls are ever going to be repaired, this being an urgent necessity.	Surrey County Council are responsible for improvements such as these - more information can be found on their website <a href="https://www.surreycc.gov.uk/roads-and-transport">https://www.surreycc.gov.uk/roads-and-transport</a>	No change
Bolsover Grove: this road is in need of repair. the corner of the grassed area is in constant use by delivery vehicles who destroy the look and cause damage to the ground. both of these issues raised	This is not applicable to the Development Management Plan	No change

need to be addressed asap.		
Horley - Parking Cost. Why pay to park in Horley when I can go to Reigate, Crawley or even Redhill? The only car park that seems to get busy is Waitrose	This is not applicable to the Development Management Plan	No change
Recycling - Improving access and egress to the Earlwood Recycling centre.	This is not applicable to the Development Management Plan	No change
Redhill - The cinema project seems to have stalled. It is an eyesore, not a heritage site - it should be demolished. The delay on the Odeon site is depressing to the town, being in the absolute centre. This is an embarrassment to RBC. It seems to me that the council did not do any checks on the financial state of the contractors. What are the council doing about it?	This is not something that the Council can control.	No change
WHEN ARE YOU GOING TO RESURFACE COURT LODGE ROAD - IT IS APPALLING	This is not applicable to the Development Management Plan	No change
Street cleaning, especially litter picking on pavements and streets, should be made a priority.	This is not applicable to the Development Management Plan	No change
Also sharper, faster responses to road and streetscape maintenance.	This is not applicable to the Development Management Plan	No change
Reigate - Any chance of some umbrellas in the park for a bit of shading?	This is not applicable to the Development Management Plan	No change
A ban on fracking in the borough is essential to allow our communities to be truly resilient and unaffected by the many issues associated with this such as contaminated groundwater.	This is not applicable to the Development Management Plan	No change

Employ more staff in the Planning Department as I know for a fact that they are over-worked and nearly overwhelmed by the sheer number of property developments currently taking place around the Borough. This means property developers are NOT adhering to the Council's Planning Regulations and Conditions of development as a result.	This is not applicable to the Development Management Plan	No change
Surrey County council have allowed planning for an oil exploration site on my road. I live in the green belt and within a residential area and I do not feel that an oil rig is an appropriate development for this site.	Minerals extraction such as this is the responsibility of Surrey County Council, not Reigate & Banstead Borough Council.	No change
The other reason that this project should not go ahead is: I have lost any trust to Reigate and Banstead council. Council properties were sold to anybody who wanted to buy them for a very small price. Most of these people made huge profits as they resold them later on. I have not heard about anything built by the council for the last 20 years? So now, private builders get contracts, they will make money, we are going to create council estates like in the past, and troubles will begin.	The sale of council properties was a national policy that the Council had no control over. There is no suggestion of creating new council estates in the DMP.	No change
Failure of the council and government to deal with broken homes.	This is not applicable to the Development Management Plan	No change
Stop wastage of food.	This is not applicable to the Development Management Plan	No change
Ban dogs from public spaces.	This is not applicable to the Development Management Plan	No change
Ban smoking from public spaces such as pavements.	This is not applicable to the Development Management Plan	No change
A borough-wide ban on fracking should be introduced due to effects on the local economy, environment,	Minerals extraction such as this is the responsibility of Surrey County Council, not Reigate & Banstead	No change

and people.	Borough Council.	
Isolation, drugs, alcohol, and boredom are rife in Merstham. Encourage all agencies to address these through social inclusion, community service, volunteering.	This is not applicable to the Development Management Plan.	No change
Are we going to see our rates increased to meet the costs of these developments in Banstead?	Business rates and council tax are not controlled by planning policy or the Development Management Plan. It is expected that the majority of developments will be brought forward by private developers.	No change
R&BBC sold our nice Council offices and built new offices at Reigate Town Hall which are now no longer needed. We were given a small local presence which you now wish to remove. This is not acceptable, especially as over a third of the population of R&BBC live in the old Banstead UDC and contribute nearly a half of the rate to R&BBC.	It is unclear exactly what is being referred to here, as the Town Hall in Reigate is still very much in use. Generally, this appears to be a comment about local politics and representation, which is not applicable to the Development Management Plan.	No change
I understand that there will be a ripe plot for redevelopment available soon - Legal and General. You could get a lot of housing, private and social, on that. Even build a few shops, put a traveller site if required, run a small bus service out to Banstead and Epsom - how about that? One site, problems solved. Somehow I doubt THAT would even be considered.	The point is noted that the Legal and General site initially appears well suited to a housing development. However, it is on greenbelt land, and therefore was not initially considered as a housing site, because the Council aims to prioritise non-greenbelt land in urban areas first. After this, greenbelt land has been considered for use as sustainable urban extensions - however, this has been based on the broad areas of search set out in the Core Strategy. Focusing on these areas is a logical, methodical approach to identifying the most suitable locations for development, and one that has a broad base of evidence behind it from the Core Strategy process, and the Legal and General site does not fall within any of the areas of search. This is why it is not being	No change

	put forward for allocation in the DMP. However, it will be considered as part of the Housing and Economic Land Availability Assessment	
No full detailed plan of how all the proposed redevelopment of Banstead is to be financed. Is it to be self financing, if so how? If it is to be financed by the taxpayers of the borough how is this to be done and what will be the estimated increase in council tax over the relevant years?	Development tends to be financed by the developers, who do so on the basis of the profit they will make from the development. Where the development is done by a public sector body they will have to fund this out of existing budgets - council tax would not be linked to development. More information on council tax can be found here: <a href="http://www.reigate-banstead.gov.uk/downloads/file/3264/council_tax_lea_flet_201718">http://www.reigate-banstead.gov.uk/downloads/file/3264/council_tax_lea_flet_201718</a>	No change
OBJECT to BV09 Hengest Farm, BV16 South of Woodmansterne Lane and BV05-19. Banstead does not need this type of development!	Noted.	No change
Horley has always been under developed as a town in terms of encouraging high street brands and local business mix, it also seems under invested in terms of practical amenities like maintenance of paths and provision of dog waste bins. It feels that Horley is a forgotten town by the council until the airport discussion comes up. Then it appears people take notice as a money making area of land rather than a hub of residents.	There is a dedicated Regeneration plan for Horley. More details of improvement in Horley can be found here: <a href="http://www.reigate-banstead.gov.uk/info/20326/horley/366/horley_regeneration">http://www.reigate-banstead.gov.uk/info/20326/horley/366/horley_regeneration</a>	No change
Land at Scratch Wood/Great Soloms Wood: I have used this space a lot since moving to Woodmansterne a short time ago. I am very pleasantly surprised to see how many other locals also avail themselves of this green area. I think it is very important to do all we can to ensure it stays open and basically not used to	Noted.	No change

provide any extra buildings: commercial or residential.		
As a general point on housing cost in this area, it is its desirability and close proximity to London which causes the high price. Building a few more properties here or in Banstead will not solve the problem. The problem emanates from London, and that is where it has to be solved.	While the point is noted, the Council still has a responsibility to meet its housing targets.	No change
In relation to housing supply there needs to be a recognition that a lot of the existing housing stock is ageing and inefficient particularly in relation to land use, energy efficiency and water use. As some stage schemes of comprehensive redevelopment will need to be considered. This isn't easy given the existing high prices and patterns of ownership but cannot be delayed forever. Planning policies should consider identifying areas adjacent to development sites for regeneration as this might encourage it to take place.	This is noted, although there is a specific regeneration team in the Council that deals with this issue more closely. Planning Policy work with them, but there are limited resources for working in multiple areas at once.	No change