



Horley Strategic Business Park Development Brief Supplementary Planning Document

Initial Consultation Statement

Prepared in accordance with Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012 (as amended)

June 2021

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1. Introduction

- 1.1. The Council's Development Management Plan (DMP) in September 2019, includes the site allocation Policy HOR9. This allocates the 31-hectare site located directly north of M23 junction 9a / A23 and east of the railway line serving the London to Brighton route. The site, situated between Horley and Gatwick Airport, is allocated for the development of a strategic business park of predominantly offices, a complementary range of commercial, retail and leisure facilities to serve and facilitate the main business use of the site and at least five hectares of new high quality public open space including parkland and outdoor sports facilities.
- 1.2. The Council's Planning Policy Service is preparing the Horley Strategic Business Park Development Brief Supplementary Planning Document (SPD) in accordance with all relevant legal requirements, in particular the requirements of the Planning and Compulsory Purchase Act 2004 (as amended), and the related Town and Country Planning (Local Development) (England) Regulations 2012 (as amended) (SI No 767, 2012), hereafter referred to as the "Local Planning Regulations".
- 1.3. With regards to consultation and involvement of relevant organisations and the public in the preparation of the draft SPD for formal consultation and subsequently the finalising of the SPD for adoption, we are also following the requirements set out in the Council's "Statement of Community Involvement in Planning" (SCI) April 2019, available on the Council's website at: [View the Council's 2019 Statement of Community Involvement in Planning](#)
- 1.4. The SCI summarises how the Council will engage its communities in its planning functions, including in the preparation of SPDs. The process, along with the timeline for this SPD is summarised in **Table 1** below.

Table 1: Timeline for preparing the Horley Business Park Supplementary Planning Document (SPD)

Stage	Date
Development Management Plan (DMP) adopted	September 2019
Early scoping and information gathering	February to August 2020
Preparation of draft SPD with input from relevant key individuals and organisations Engagement methods included workshops, emails and preparation of two specialist consultants' reports (on Economic Update and Design / Massing)	August to May 2020
Writing the draft SPD	April to October 2021
Consultation on draft SPD with supporting Initial Consultation Statement, Strategic Environmental Assessment and Habitats Regulations Assessment Screening Statement.	November 2021 to January 2022
<i>Consider representations received and update draft SPD as relevant</i>	<i>January to February 2022</i>
<i>Anticipated Adoption of the SPD</i>	<i>March 2022</i>
<i>Publish SPD with final Consultation Statement and Adoption Statement</i>	<i>March 2022</i>

1.5. In accordance with the Local Planning Regulations (Regulation 12), this Initial Consultation Statement has been prepared to accompany the draft Supplementary Planning Document (SPD) when it is made available for a four-week formal consultation period.

1.6. As required, this initial Consultation Statement sets out:

- Who the Council consulted with when preparing the SPD;
- A summary of the main issues they raised; and
- How those issues have been addressed in the SPD.

2. Preparing the SPD

- 2.1. Following adoption of the DMP in September 2019, the Planning Policy Service commenced preparation of the SPD in spring 2020 with desk-based analysis of issues, constraints, and opportunities. This was followed in the autumn by a series of online meetings with presentations to inform and to stimulate discussion on what to include in the draft SPD. Emails were also sent to relevant organisations and individuals inviting input to the draft SPD. The individuals and organisations which the Planning Policy Service involved to inform the content and prepare the draft SPD are listed in **Table 2**.
- 2.2. A summary of the main issues these individuals and organisations raised are listed in **Table 2**. Their input was valuable in inform the drafting of the SPD. Where a consensus was reached on an issue between stakeholder's opinions, these have been incorporated in the draft. Otherwise, their suggestions have been incorporated as far as possible into the draft SPD.
- 2.3. In late 2019 and early 2020, planning officers worked with two specialist consultancies to sense-check the employment demand given changes to working patterns and the economy since the pandemic and the exit of the UK from the European Union, and to inform the site layout, and massing, design and sustainability issues relating to the development of the site. These two reports that informed preparation of the draft SPD are provided for information alongside the draft SPD.
- 2.4. The comments and information gathered from meetings with a variety of Council officers, councillors, locals and specialist statutory organisations; written input from infrastructure providers; Policy officer's desk top work; and consultants' Economic Demand and Impacts and Design reports, has informed a list of opportunities, constraints and challenges relating to the development of the site, provided in the draft SPD.

Table 2: Individuals and Organisations consulted in the preparation of the draft Supplementary Planning Document

Organisation / individual consulted	Main issues raised	How these issues have been addressed in the draft SPD:
<p>Horley Town Councillors; RBBC ward councillors representing Horley Central and South, Horley East and Salford, Horley West and Sidlow wards, and Council Planning Policy officers</p> <p>Invited to a “Virtual” Meeting in Oct 2020</p>	<ul style="list-style-type: none"> • Input to SPD’s “Vision” for the site • The site needs to be integrated with the whole of Horley town, not just the town centre • The new public park should be one for Horley town to be proud of • What will the business parks’ selling point be? • To attract employees into Horley town centre, the walk through the park needs to be attractive • Location of sports pitches • Delivery of new public park, the flood alleviation works needed, and the business park need careful phasing • Important to include environmental sustainability in the Vision • A conference centre is needed in this area and could be a very positive element in this location, possibly with a related hotel • SPD should include photos of what could be achieved on the site • Higher buildings should be located along the A23/M23, lower buildings closer to the existing residential areas • Transport infrastructure must not be car-based; commuter car parking in the streets surrounding the station is an issue • Do not want vehicle access to the site from Limes Avenue • The railway footbridge and the pedestrian route along the eastern side of the railway under the A23 need improving if business park employees are to walk to and from Gatwick station and Horley to the site. • Potential for negative impact on Horley town centre if not well linked to the 	<p>Incorporated comments into:</p> <p>Vision for the Business Park site</p> <p>Site layout section</p> <p>Key considerations section: Transport and Active Travel sections</p>

	development, e.g. could consider a shuttle bus between the town centre and the site	
<p>Horley Town Councillors</p> <p>Invited to a “Virtual” Meeting in Nov 2020</p>	<ul style="list-style-type: none"> • A main concern locally appears to be replacing greenfield undeveloped land with buildings • Recognise the sites’ important strategic location • The SPD should require enhancements to biodiversity for the site and surroundings • Improving the flooding in the northern part of the site and surrounding roads will be a positive result and will be needed due to increased hard surface on the site from its development • Introduction of new swales or ditches on the site needed to help improve flooding situation on the new public park, which is the lowest part of the site. These could potentially feed into Gatwick Stream • The existing culvert between Staffords Place and Limes Avenue is very restricted, and needs investigating to see if it can be cleared and widened to increase its capacity. A survey of existing ditches and culverts is needed to design new swales and balancing ponds for flood relief • Use the area between the houses and the new office buildings for a green boundary and flood relief • The SPD should encourage roadways and other hard surfaces on the site to be of permeable materials wherever possible to minimise run-off • Discussion about ideas for the new public park to be created on the northern part of the site; what local residents would like to see what would be suitable and unsuitable for the area; ideas included formal and informal play areas. Formal pitches may need a changing pavilion, car parking and lighting • With benches in suitable location, could become a pleasant area for local residents and employees on the site to relax, similar character to the Riverside 	<p>Key Considerations: Flooding section</p>

	<p>Garden Park to the west of the site, which is used by Gatwick airport employees</p> <ul style="list-style-type: none"> • Commissioning of a “statement” water feature for the park is supported (it would need to take account of any issues with standing water features in relation to the airport). • Layout of the site will need to inform the building design, which should not be “boxy” standard office type, prefer bold design like the L3 Harris pilot training centre in Crawley • Building design must be bold and modern, designed for the future, with suitable technology in order to attract forward-looking companies • Ducting for digital infrastructure needs to be designed in at the start when it is easier to install. To attract desirable companies, it will be crucial to future-proof the site for future technologies. • Electric charge points must be provided across the whole site • Building design must aim for carbon neutral, including solar panels and technology for batteries to store electricity or hydrogen tanks, or underground heat pumps • The ecological / sustainable green credentials of the development will be a good selling point to suitable businesses • SPD shouldn’t be overly prescriptive on technology, rather what it seeks to achieve, as technologies are rapidly changing • Would prefer to see underground car parking, which would allow for good use of the site • Any multi-storey parking needs to be designed well with interesting design features • Access to the site for pedestrians and cyclists needs improving • A free shuttle bus to the site would be helpful for employees • Residents living north west of the site have a long walk to access the site. A new 	<p>Delivery: Infrastructure Requirements section</p> <p>Key Considerations: Sustainable Design and Construction section</p> <p>Key considerations: Highways Access and Parking and Active Travel sections</p>
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	<p>route should be investigated, potentially along or around Limes Avenue.</p> <ul style="list-style-type: none"> • Discussed which local residents' groups to contact • Site should include a conference centre, as good strategic location and currently very little provision between London and the south coast • Discussion about supporting uses on the site and whether they will be intended to serve the employees on the site or the wider area. The supporting facilities will be for all to use, to support the site employees and to attract people from the wider area, but care must be taken that they do not have a negative impact on Horley town centre and wider Horley area. • Would support a "wellness" centre with a gym / fitness studios, mental health and GP facility, chemist & health food facility, possibly a place for worship, and a workplace nursery 	<p>Key considerations: Land use</p>
<p>Local Residents Associations and Action Groups: Court Lodge Residents Association (RA), The Acres RA, Hookwood RA, Northwood Hill RA, Ladbroke Road RA, and Westvale park RA, Keep Horley Green, and Horley Access Group</p> <p>Invited to a "Virtual"</p>	<p>It became apparent that some of the groups invited to participate are not currently active, so the meeting had only one long-term resident of the area and member of "Keep Horley Green" (KHG) attending, who provided useful comments and input to the SPD. The main issues raised were:</p> <ul style="list-style-type: none"> • Would like to keep the site predominantly green space as is now • Outlined important features to retain including old hedgerows • Importance of retaining what is important to the local area, such as the character of adjoining roads such as Bayhorne Lane with its listed historic Bayhorne Farm and barn and stable yards. • New public open space provision should focus on what the area needs, such as natural wildlife areas with wooded areas and ponds • The new public open space must be well managed and maintained • Significant investment is needed to alleviate flooding in the area, flood alleviation should take into account experiences of current tenants of the land on the site that 	<p>Site constraints, challenges, and opportunities</p> <p>Key Considerations: Open space section</p> <p>Key Considerations: Flooding</p>

<p>Meeting in Nov 2020</p>	<p>floods</p> <ul style="list-style-type: none"> • A new bridge across the railway to the northern part of the site would be useful • Buildings should be ecologically sustainable including green / living walls and roofs, and appropriate materials (not concrete nor timber cladding) and power-generation • Building heights and views of the site will be important to consider; the developed should be stepped to be lower closer to existing houses with the site screened with planting from Balcombe Road • The need for additional new office floorspace should be reviewed • Other uses should be considered, including education (potentially a 6th form college) • Non-office uses on the site should benefit the town (such as primary school or 6th form college or NHS dentist) but should not compete with the town (any food shops need to be small) 	<p>section</p> <p>Key Considerations: Active Travel section</p> <p>Key Considerations: Land Use section and Chilmark Consulting's 2020 report</p>
<p>RBBC's Greenspaces Managers, Open Space Development Manager, Head of Place Delivery, and Place Project Manager</p> <p>Invited to a "Virtual" Meeting in Nov 2020</p>	<ul style="list-style-type: none"> • Noted that the site allocation includes "high quality public open space including parkland and outdoor sports facilities" • Discussion regarding the needs for open space provision in Horley town, and what type of open space and outdoor sports facilities would be most suitable for this site • Including consideration of the Council's Open Space Assessment 2016 • The Place Delivery Team is considering where additional Horley cricket and football pitches would be best located • The management including its future management costs will need to be factored in and would possibly need to part of an "equalisation agreement" • The new public open space should be provided early on in the development's phasing • Considerable parking provision and an adopted road would be needed to provide vehicle access to any formal sports pitches 	<p>Key Considerations: Open space section</p>

<ul style="list-style-type: none"> • JLL • Surrey County Council's (SCC's) Head of Land Acquisitions and Disposal <p>Site landowners and their representatives were invited to a "Virtual" Meeting in Nov 2020</p>	<p>increases in bird strike</p> <ul style="list-style-type: none"> • Need to get car parking provision on site right, which will require balancing market demands and operational requirements with exemplar sustainable travel and M23 spur road capacity • Discussion about capacity at J9A roundabout and Gatwick Airport's potential future needs • The new access road from J9A of M23 spur road needed to access the site would need planning permission in itself and needs to be done early on to open up the site • Potential safeguarding of some land for Gatwick airport expansion • Building design and materials need to be exemplary, achieving at least BREEAM "very good" requirements, and must be high quality but flexible to appeal broadly. The development would need to comply with SCC and RBBC's sustainability requirements • Power and Digital infrastructure both need considerable attention early on, but SPD should not be overly prescriptive 	<p>Key Considerations: Highway Access and Parking section</p> <p>Key Considerations: Sustainable Design and Construction section</p> <p>Delivery: Infrastructure Requirements section</p>
<p>Horley Access Group</p>	<p>No comments received</p>	
<p>RBBC Tree Officer</p>	<ul style="list-style-type: none"> • A full Arboriculture and Ecological Survey will be required at the planning application stage including impact assessment on existing trees 	<p>Key considerations: Open space section</p>
<p>RBBC's Senior Conservation Officer</p>	<ul style="list-style-type: none"> • Fishers Farm includes a number of statutory listed buildings • Bayhorne Farm includes locally listed buildings, such as the granary (including cart shed, farmyard and two farmhouses), and a number of traditional Victorian buildings worthy of retention and conversion (in accordance with the Council's 	<p>Site Analysis: Site constraints</p>

	<p>Barn and Farm Conversion SPD 2020).</p> <ul style="list-style-type: none"> • The granary could potentially be retained and converted to maybe provide small office units • The northern part of the site has extensive historic hedges marked on the 1602 map of Horley which should be retained where possible and tree lines and Meadowcroft has extensive garden woodland dating from 1900 • The site includes a mature historic landscape character with mature woodland. • Retention of historic hedges and trees should be encouraged where possible. <ul style="list-style-type: none"> • Balcombe Road should become a Green Corridor and should continue and strengthen the A23 Parkway to prevent settlement coalescence and retain the green and wooded rural character in accordance with the Local Character and Distinctiveness Guidance SPD. <ul style="list-style-type: none"> • Recommend a 25 metre-wide green buffer for screening of any 2-storey buildings, wider if higher buildings are planned then a wider buffer would be recommended (bearing in mind as well the elevated levels of the A23). • New vehicular entrances into the site should be of minimal width where possible. <ul style="list-style-type: none"> • Building heights should be maximum of 5 storeys in line with Horley's Russell Square building • Acknowledging that buildings at Gatwick Airport are up to 14 storeys (about 42m high), development on the site should step down in height towards the listed buildings to the north of the site 	<p>and Opportunities</p> <p>Trees, hedgerows and Landscape Character</p> <p>Delivery: Planning Application Requirements section</p> <p>Site Layout: Building Design Guidance section</p>
Historic England	<ul style="list-style-type: none"> • Heritage Assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance. The setting of an asset may form a part of its significance. (National Planning Policy Framework paragraph 184) • There are no designated heritage assets within the site itself but that one listed building, Grade II Fisher's Farm, is located a short distance from the site boundary to the north of the site. • While it would not be necessary to consult Historic England on the effects of 	

	<p>development proposals on this particular heritage asset, we would advise that the SDP encourages the site promoter / developer to undertake a <u>Heritage Impact Assessment (HIA)</u> of the development on the setting of Fisher's Farm and other potential heritage assets and historic character within and surrounding the site (e.g. the field boundaries noted in the Development Management Plan policy HOR9).</p> <p>A HIA should include the following factors:</p> <ul style="list-style-type: none"> • All heritage assets should be considered encompassing buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest (archaeological, architectural, artistic or historic). These include designated heritage assets and other assets identified by the local planning authority (including local listing). • Implications of development (positive and negative) for the setting of a heritage asset and its significance should be considered. • The potential archaeological interest of a site. In considering implications for landscape and townscape character, relevant information on the historic character of places should be utilised for example historic landscape characterisation, historic environment assessments, historic area assessments, extensive urban surveys and conservation area appraisals, and other historic characterisation studies. • The specific consideration of settlement character may also be appropriate, as for example whether development would significantly alter the historic settlement pattern (positively or negatively). 	<p>Planning Delivery: Planning Application requirements section</p>
<p>RBBC Environmental Protection and Air Quality Officer and Team Leader</p>	<ul style="list-style-type: none"> • As the site may be built out over a period of about 20 years, with regards to residential amenity (especially noise and dust during construction) given the proximity of Meadowcroft, Watersville Way, Bayhorne Lane, Apperlie Drive, Limes Avenue and Staffords Place, which all adjoin the site. • Whilst they will likely be screened somewhat from the development, they still have potential to be impacted by construction impacts (noise, dust etc.), more so the properties on the eastern side, including Meadowcroft Close, as the Balcombe Road access will enter the side just south of this (around the Meadowcroft House area) • The SPD could require a construction management plan in accordance with 	<p>Infrastructure Requirements,</p>

	BS5228 that also takes account of development in the wider surrounding area given possibility that there may also be airport-related development at Gatwick during the same period.	planning conditions and obligations
Surrey Wildlife Trust	No comments received	
RBBC Sustainability Project Officer	<p><u>Biodiversity</u></p> <ul style="list-style-type: none"> • If trees do need to be felled use a scalable approach to replacement (see p.66 of Crawley Council’s Draft Local Plan), rather than ‘a tree for a tree’ (which can mean replacing mature trees with whips) • Consider early implementation of biodiversity net gain, i.e. 10%+ increase post-development according to DEFRA’s Biodiversity Metric • Where there is additional planting, consider pollinator / native species to support biodiversity, i.e. bee-friendly plants etc. • Where bridges are installed / improved to provide access, look at options to create ‘green bridges’ to link green spaces and provide wildlife corridors • As the site has hedgerows / trees formulating old boundaries, the Woodland Trust may be able to provide useful input. See guidance at https://www.woodlandtrust.org.uk/publications/2019/06/planners-manual-for-ancient-woodland/ • Ask Woodland Trust for their comments on the draft SPD <p><u>Water</u></p> <ul style="list-style-type: none"> • Good coverage of sustainable best practice around water, including. SuDS, minimising flood risk, permeable surfaces, greenfield run-off rates, etc. If balancing ponds are implemented, there is an opportunity to include water source heat pumps • While water is covered in relation to soft-landscaping, drainage, etc., no mention of water efficiency measures within the build, e.g. use of low-flow fixtures, grey water recycling, etc. <p><u>Transport</u></p>	Key considerations: Building design and sustainable design and construction

	<ul style="list-style-type: none"> • Good coverage of sustainable transport options; where there are proposed walking/cycling routes, explore opportunity to align with green infrastructure (i.e. green corridors etc.) • While the focus is on public transport / non-motorised transport, there is provision for car parking – but no mention of provision of EV charging points that I could see • Look at securing car club provision at the development if feasible <p><u>Energy efficiency/renewables</u></p> <ul style="list-style-type: none"> • While renewables are mentioned, the report doesn't provide concrete solutions (turbines not suitable, solar if no glare hazard, biomass has air quality considerations) – need to ensure that best viable solution is a renewable one (in line with requirements for flight paths etc.) • Aim above BREAAAM 'very good' – can we aim for 'excellent' (although noted that site may make this challenging) • Sustainable construction – mentions the use of recyclable materials; also consider use of recycled building materials where possible and certified materials (such as FSC for carcassing / cladding, etc.) • Green roofs mentioned re: insulation, but more consideration needed to sustainable building design re: insulation (cavity wall, floor, use of sustainable / low impact materials, etc.) • Some consideration given to passive design around ventilation, but also other aspects such as thermal mass, air-tightness, etc. could be considered • Good that possibility of district heating is mentioned – this development could be a great opportunity for this 	<p>Key Considerations: Highway access and parking</p> <p>Key considerations: Building design and sustainable design and construction</p>
Environment Agency	<ul style="list-style-type: none"> • Horley is situated at the confluence of the River Mole and Gatwick Stream, and a short distance downstream is the confluence of the River Mole and Burstow Stream. • All three rivers flow through the town in open channel, and all pose a risk of flooding to homes and businesses in events of varying magnitude and return period. 	<p>Site Constraints: Flooding section</p>

	<ul style="list-style-type: none"> • Whilst there is a need to make best use of land in the borough, there is a policy requirement that this is balanced with the need to ensure new development is designed safely and will not worsen the risk of flooding for others. • The EA is pleased that the SPD acknowledges that flooding is an issue within the area of the proposed development. • All our maps and data sets are regularly reviewed and updated so it's important you are using the latest data as part of the evidence base for the SPD. • The latest data and maps are available to download from: http://environment.data.gov.uk/ds/partners/index.jsp#/partners/login • The Council with the help of the Environment Agency has undertaken a Strategic Flood Risk Assessment to fully understand the flood risk in the area from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that land use changes and development in the area will have on flood risk. • Advice on the scope required should be sought from the Environment Agency for <u>site specific Flood Risk Assessment</u>. • We support the nature improvements along the Ditch network. • Establishing green buffer zones along watercourse helps to protect and enhance this function. • River corridors are important habitats and can be valuable links between larger areas of habitat enabling wildlife to move between them. <p><u>Flood risk management</u></p> <ul style="list-style-type: none"> • The Environment Agency has carried out <u>detailed modelling of fluvial flood risk for the Horley area</u> which includes the potential impact of climate. • This indicates a relatively large increase in the number of properties at risk of flooding within Horley. • Flood Zone 2 Medium Probability affects a considerable number of properties within Horley; an important planning consideration. • The depth of flooding, even in Zone 2, can be quite considerable in parts of Horley. 	<p>Key Considerations: Flooding mitigation section</p> <p>Planning application requirements section</p> <p>Site Constraints: Flooding section</p> <p>Key Considerations: Flooding mitigation section</p>
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	<p>safeguarded from flooding</p> <ul style="list-style-type: none"> • The Environment Agency would like any scheme to provide sufficient protection to existing properties at risk from flooding in Horley. In particular those areas in Horley East ward, adjacent to the Burstow Stream and Haroldslea Stream. • The EA is keen to develop a <u>natural flood management approach</u>. This element of the work links in with wider sustainability and habitat creation. It looks to utilise natural flood risk management techniques to slow the flow and store flood waters. This is the <u>natural washlands</u> element. • A site specific <u>Flood Risk Assessment (FRA)</u> for any development should be undertaken in order to ensure that flood risk is avoided. In order to achieve the above aims, a FRA should be undertaken to:- <ul style="list-style-type: none"> • Demonstrate that new developments will not increase flood risk on site and elsewhere including during all phases of their development; • Provide a detailed assessment of potential flood risk from all sources such as fluvial, groundwater, sewers and surface run-off and a strategy to manage all such risks; • Assess the potential impact of climate change, urbanisation and their inherent uncertainty; • Update data upon and add to the understanding of flood risk in the Horley area; • An assessment of the likely impact of any displaced water on neighbouring or other locations that might be affected subsequent to development is required. This should address the potential for change of the flooding regime both upstream and downstream of the site due to ground raising or structures. • We are pleased to see the requirement to incorporate Sustainable Drainage System (SUDs) into new development. • SUDs should involve a range of surface water drainage techniques, some of which will be invisible, such as porous surfaces for parking areas, while others will provide potential to create attractive new features such as shallow watercourses, ponds and reed beds. These will probably be placed in open space, notably in the Ditch network, and will be very effective in slowing down, filtering and reducing the volume of surface water compared with a normal sewer system, while also 	<p>Delivery: Planning application requirements section</p> <p>Infrastructure Requirements, planning conditions and obligations</p> <p>Key Considerations: Flooding Mitigation section</p>
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	<p>enhancing the area's biodiversity.</p> <ul style="list-style-type: none"> • It will be essential that SUDS are properly planned at the onset of planning for the 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 development schemes. <p>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> <ul style="list-style-type: none"> • If SUDs cannot be included on the site, the developer should contribute to a scheme in the surrounding area – this could be by implementing a scheme, or by providing some money for a future scheme. <p><u>Watercourses and Biodiversity</u></p> <ul style="list-style-type: none"> • The Horley area is crossed by many smaller watercourses and it is important that these are retained and incorporated into the new development. • These small watercourses are ecologically important, and development should incorporate buffer strips and bank side and in- stream enhancements where appropriate. • Watercourses are also a very important drainage resource, providing storage capacity as water backs up along them when water levels are high in local rivers, reducing the risk of flooding. • The Environment Agency has a particular role to play in the conservation and enhancement of species and habitats that are dependent on the water environment. In the planning process we are particularly concerned with biodiversity associated with main rivers. • Watercourses and their green corridors are vitally important for wildlife. • There is also a direct link between environmental quality, economic vitality and our mental and physical health and wellbeing. • A high-quality water environment makes places attractive, providing valuable local amenity and recreation space. • The water environment also supports our resilience to climate change as areas of 	<p>Planning application requirements section</p> <p>Key Considerations: Mitigation of Flooding section</p>
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	<p>water and water storage and associated green space help reduce flood risk and provide urban cooling during periods of high summer temperatures.</p> <ul style="list-style-type: none"> • Watercourses and connected river corridors reduce the impacts of climate change on biodiversity by enabling species and habitats to move as environmental conditions alter. • Some of the challenges are from damage to and fragmentation of habitats which reduces their ability to provide benefits. This can arise from development encroaching on rivers and past poor management techniques leading to concreting river banks; culverts and other in channel structures. Diffuse pollution, invasive non-native species, climate change and increased demand for water from our growing population further add to these pressures. • The SPD can provide a mechanism to improve biodiversity to ensure that development protects and enhances existing wildlife sites and corridors and also provides opportunities to develop new habitats. It can help to reverse the overall decline in biodiversity to achieve a net gain, including by establishing coherent ecological networks that are more resilient to current and future pressures. • <u>Biodiversity net gain</u> is an approach which aims to leave the natural environment in a measurably better state than beforehand. <p>The Environment Bill has mandated that planning permission will only be given if developers can demonstrate a 10% increase in biodiversity on or near development sites. There are some exemptions.</p> <p>Natural England are the lead responsible organisation for advising on the adoption of <u>biodiversity net gain</u> into planning policy.</p> <p>We recommend that you seek advice from Natural England on how to incorporate this into your local plan policies.</p> <p>DEFRA's Biodiversity Metric 2.0 tool has recently been developed alongside specific metrics to enable developers to calculate losses and gains.</p> <ul style="list-style-type: none"> • Guidance was provided regarding biodiversity on land adjacent to watercourses, and on legal requirements of such. This is not relevant to the site, as it does not include any watercourse 	<p>Key Considerations: Open space; biodiversity section</p> <p>Key considerations: Open space; biodiversity section</p>
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	<p><u>Quality Design</u></p> <ul style="list-style-type: none"> • We are pleased to note that the SPD stresses the need for high quality design. Paragraph 130 of the NPPF "states clearly that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides". • The New <u>National Design Guide</u> emphasises role of NPPF in design grounds refusals. • On built form, the document states that well-designed places have compact forms of development that are walkable, contributing positively to well-being and place making. It adds that "well- designed new development makes efficient use of land with an amount and mix of development and open space that optimises density." • On "nature", the document states that well-designed places "prioritise nature so that diverse ecosystems can flourish to ensure a healthy natural environment that supports and enhances biodiversity". • It also states that open spaces should include "well-integrated drainage, ecology, shading and recreation that achieve a biodiversity net gain as required by the 25-year Environment Plan". • We note the requirement in bullet 3 of Policy HOR9, "Design" section that buildings should be of an exemplar standard of design. • We would like to see a requirement for at least the larger developments to achieve BREEAM standards of Very Good or Excellent in respect of water efficiency, bearing in mind the serious water stress of the area as set out in our classifications Water stressed areas - final classification (2013) 	<p>Key Considerations: Building Design and Sustainable Design and Construction Guidance section</p>
<p>Surrey County Council in capacity as Lead Local Flood Authority for the area</p>	<ul style="list-style-type: none"> • In its capacity as the Lead Local Flood Authority (LLFA) Surrey County council are a statutory consultee on all major planning applications in relation to the sustainable drainage system proposed. • Many drainage schemes that deliver the management of water quantity but do not fulfil the four pillars of SuDS design as defined by the SuDS Manual. • The manual encourages schemes that manage the quantity and quality of surface water runoff, provide an amenity that integrates surface water as an attractive part 	<p>Delivery: Planning application requirements section</p>

	<p>hold and/or convey water as part of the design, flooding does not occur on any part of the site for a 1 in 30-year rainfall event.</p> <ul style="list-style-type: none"> • Evidence must be provided to establish the greenfield runoff rate for the site and for previously developed sites, evidence must be provided where the greenfield runoff rate cannot be reasonably practicably achieved. • Regarding the specific site itself, we would expect to see ground investigations carried out to establish whether infiltration to the ground is suitable as a method of discharge (in whole or in part). 	<p>Delivery: Planning Application Requirements</p>
<p>Thames Water</p>	<p><u>Wastewater/Sewerage Infrastructure</u></p> <ul style="list-style-type: none"> • The scale of development/s is likely to require upgrades to the wastewater network. • TW recommends that the developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a <u>Development and Infrastructure Phasing Plan</u> to determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. • Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. • In this respect we support the section of Policy HOR9 under drainage referring to the need for early discussions with Thames Water. • The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development • A key sustainability objective for the preparation of Local Plans and SPDs should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. • It is important to consider the net increase in wastewater [and water supply] demand to serve the development and also any impact that developments may have off site, further down the network. • The SPD therefore correctly seeks to ensure that there is adequate wastewater 	<p>Delivery: Pre-application and Planning Application Requirements sections</p>

	<p>[infrastructure to serve the new development/s.</p> <ul style="list-style-type: none"> • Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under-estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. <p><u>Flood Risk and SUDS</u></p> <ul style="list-style-type: none"> • The National Planning Practice Guidance (NPPG) requires a sequential approach to be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". • When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. • It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. • Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. • Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. • It is the developer's responsibility to make proper provision for <u>surface water drainage</u> to ground, watercourses or surface water sewer. • It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. • Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. 	<p>Delivery: Planning application</p>
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	<ul style="list-style-type: none"> • Ensure all water efficiency measures are taken, at a minimum fitting water efficiency devices across the site (tap aerators, shower regulators, low flow shower heads, efficient urinals, efficient toilets) and ensure landscaped areas need limited watering. • Consideration could be given to specifying an efficiency level under the BREEAM certification scheme. <p><u>Catchment Management:</u></p> <ul style="list-style-type: none"> • Consider ways to prevent local rivers / groundwater being adversely impacted by this development, such as limiting road and silt run-off and implementing sustainable drainage systems. 	Key Consideration: Sustainable Design and Construction section
SGN	No comments received	
Surrey Fire & Rescue	No comments received	
West Sussex Fire & Rescue; Water & Access Manager	<ul style="list-style-type: none"> • Suggested planning condition to ensure that all commercial properties on the proposed site are within 90m of a fire hydrant for the supply of water for firefighting. • Advised that evidence will also be required that Fire Service vehicle access meets with the requirements identified in the Approved Document B Volume 2: 2019 Edition - B5 Section 15, including Table 15.1, 15.2 and diagram 15.1. <p><u>Suggest planning conditions:</u></p> <ol style="list-style-type: none"> 1. Prior to the commencement of the development details showing the proposed location of the required fire hydrants shall be submitted to and approved in writing by the Local Planning Authority in consultation with West Sussex County Council's Fire and Rescue Service. These approvals shall not be unreasonably withheld or delayed. 2. Prior to the first occupation of any dwelling/unit forming part of the proposed development that they will at their own expense install the required fire hydrants (or in a phased programme if a large development) in the approved location to 	Key considerations: Site Layout section Delivery: Planning conditions and obligations

	<p>BS 750 standards or stored water supply and arrange for their connection to a water supply which is appropriate in terms of both pressure and volume for the purposes of firefighting.</p> <p>3. The fire hydrant shall thereafter be maintained as part of the development by the water undertaker at the expense of the Fire and Rescue Service if adopted as part of the public mains supply (Fire Services Act 2004) or by the owner / occupier if the installation is retained as a private network.</p> <p>4. As part of the Building Regulations 2004, adequate access for firefighting vehicles and equipment from the public highway must be available and may require additional works on or off site, particularly in very large developments. (BS5588 Part B 5) for further information please contact the Fire and Rescue Service</p> <p>5. If a requirement for additional water supply is identified by the Fire and Rescue Service and is subsequently not supplied, there is an increased risk for the Service to control a potential fire. It is therefore recommended that the hydrant condition is implemented</p>	
South East Coast Ambulance Service NHS Foundation	No comments received	
UK Power Networks	No comments received	
Telecoms Providers (various from Policy database)	No comments received	
CLH Pipeline System Ltd	Map of pipeline apparatus provided, which is however, in north of the borough, not near the site.	
Highways England; Area 4 Spatial	<ul style="list-style-type: none"> Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 	

<p>Planning Manager (Acting)</p>	<p>and is the highway authority, traffic authority and street authority for the strategic road network (SRN).</p> <ul style="list-style-type: none"> • The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. • Highways England will be concerned with plans and / or proposals that have the potential to impact on the safe and efficient operation of the SRN. • In the case of this SPD our focus will be on any potential impact to the M23 Gatwick Spur and the M23 mainline including the two roundabout junctions. • In terms of the key aspects of the policy HOR9 the traffic and transport matters relating to the developments impacts appear to be adequately covered. However, there are some other key points that are worth including within the document as follows: <p><u>Drainage</u> –</p> <ul style="list-style-type: none"> • Highways England will not accept any storm water run-off from the development to be discharged into its drainage asset or into the highway boundary in accordance with DfT Circular 2/2013 clause 50. <p><u>Boundary</u> -</p> <ul style="list-style-type: none"> • The site and M23 Gatwick Spur share a common boundary and any landscaping / boundary treatment adjacent to the M23 Spur boundary will need to be considered and approved by Highways England. • This includes any geotechnical works, structures, planting, noise / environmental barrier etc. • Such features will not be accepted within the highway boundary in accordance with DfT Circular 2/2013 Annex A clause A1. • Highways England will also need to agree any site advertising/billboards which are visible from the M23 Spur or indeed any standalone advertising. Any such advertisement which is considered to be a distraction to the driver and hence create a safety risk is likely to be refused. 	<p>Delivery: Infrastructure requirements, planning conditions and obligations</p>
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Surrey County Council highways officers	No comments received	
Department for Transport	No comments received	
West Sussex County Council	No comments received	
Network Rail	No comments received	
GTR	No comments received	
Great Western Railway	No comments received	
Commercial Director of Metrobus	<p>Metrobus operates a very comprehensive 24-hour bus network connecting local neighbourhoods and towns to Gatwick South Terminal A23 and also to eastern Horley.</p> <p>We are very keen to work with you on the development of this proposal, whether it is expected to have buses permeating the site in a traditional or demand-responsive way, or if it is deemed best to improve the pedestrian access to the existing Gatwick South bus stops to access the excellent services already provide there.</p>	
Compass Bus	No comments received	
Sustrans	No comments received	
Reigate and Banstead Cycle Forum	No comments received	

SCC Cycle Transport officers	No comments received	
Crawley Borough Council Planning Policy Service	No comments received	
Gatwick Airport Ltd (GAL): Surface Access Team	No comments received	
Gatwick Airport Ltd: Airport Safeguarding	<ul style="list-style-type: none"> • This response relates solely to aerodrome safeguarding matters in relation to Gatwick Airport and does not take into account any other land use planning aspects which GAL may raise for example the impact on the transport network. <p><u>Aerodrome Safeguarding</u> is a legislative requirement for officially safeguarded aerodromes of which Gatwick Airport is one. Aerodrome safeguarding is the process used to ensure the safety of aircraft while taking off and landing or flying in the vicinity of aerodromes.</p> <ul style="list-style-type: none"> • It is vital that their safe operation is not impacted upon by buildings, structures or works which infringe the protected Obstacle Limitation Surfaces (OLS), impact on navigational aids utilised by the airport, distracting or confusing lighting or by development which has the potential to increase the number of birds or the bird hazard risk. Please note this list is not exhaustive. • Aerodrome safeguarding is embedded in the <i>Town & Country Planning Process by way of ODPM/DfT Circular 01/2003 'Safeguarding of Aerodromes, Technical Sites & Military Explosives Storage Areas: The Town & Country Planning (Safeguarded Aerodromes, Technical Sites & Military Explosives Storage Areas) Direction 2002.</i> • With regard to the proposed development outlined in your email dated 09 June 2020, as there are no details of any buildings or structures at present we are only able to give some general aerodrome safeguarding advice as follows: <u>Height Limitations</u> There are a several elements that will govern what is an acceptable height for a development with regard to an aerodrome safeguarding perspective. These are: <ul style="list-style-type: none"> • Obstacle Limitation Surfaces (OLS) 	Site Analysis: Site Constraints section

	<ul style="list-style-type: none"> • Navigational Aids • Instrument Flight Procedures (IFPs) <ul style="list-style-type: none"> • It appears that with regard to this site the most restrictive set of <i>protected surfaces</i> will be with regard to <i>navigational aids</i>. • They have advised that they are unable to give a blanket height restriction as it very much depends on where the buildings will be sited, the size of the building footprint and as to whether they are in line of site to the radar. • Gatwick's air traffic control providers ANS (Air Navigation Solutions) & NERL (NATS EN Route Ltd) have said that as a rule of thumb any buildings proposed for this site should be the same height or lower than the buildings on airport to the south & south west of the proposed site. However they would still be subject to a full assessment. • We cannot be more prescriptive with regard to height restrictions at this stage. • Once indicative heights, footprints and siting of the proposed buildings are available, I will be pleased to carry out further checks with regard to any potential impacts on navigational aids. • AOA Advice Note 1 'Safeguarding of Aerodromes' provides helpful information. <p><u>Bird Hazard Management</u></p> <ul style="list-style-type: none"> • As this development is in such close proximity to the airport and flight paths, careful consideration needs to be given to the design of the development to ensure that birds hazardous to aviation are not attracted to this site over and above the numbers that already exist. • Birds that are more likely to cause damage to aircraft are flocking birds such as Starlings and Gulls and large heavier species such as waterfowl. However other species such as Pigeons and Corvids can also be problematic. • GAL has an <u>active bird management programme to reduce risk</u>. We always seek to work with developers, LPA's and others to ensure that proposed schemes meet environmental requirements where possible but at the same time do not increase the bird strike risk to aircraft operating at the airport. <p>With regards to <u>Bird Hazard Management</u>, the following elements need to be taken into consideration:</p>	<p>Key Considerations: Site Layout and Building Design sections</p> <p>Site Analysis: Site Constraints section</p>
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	<p><u>Landscaping</u></p> <p>Large landscaping schemes including tree and shrub planting has the potential to increase the attractiveness of the site to birds hazardous to aviation for example:</p> <ul style="list-style-type: none"> • Create dense vegetation that may become a roost. • Provide an abundant food supply in the form of fruits, nuts or berries. • Large areas of woodland will be attractive to birds for nesting, roosting and loafing. <p>Given the above we make the following recommendations:</p> <ul style="list-style-type: none"> • Ideally areas of woodland should be minimised in favour of a more open park landscape and areas of scrub. Any planting should minimise large trees such as Oak and Scots Pine, a few single large trees would be acceptable. There should be smaller more loosely canopied trees such as Black Poplar. • Any woodland planting should be planted on the part of the site furthest away from the airport. • Berry & fruit bearing species should be minimised, ideally in this location less than 20% of the planting palette should be fruit/berry bearing species and they should be dispersed throughout so that large areas of exploitable habitat are not formed. <p>The smaller bird species such as Sparrow, Finches, Blue Tits etc are generally not an issue.</p> <p>Some habitats that can be used to help meet the environmental credentials, but should not increase the birdstrike risk to the airport are:</p> <ul style="list-style-type: none"> • Long grass meadows and planting for pollinators should not result in an attractant for hazardous birds. • The provision of habitat for bats (excluding open water), bat boxes and bird boxes for smaller species would be acceptable. • Scrub or bare ground habitat for invertebrates or smaller bird species would be acceptable. • Areas of short grass would not be problematic as long as they are kept away from open water. • Green walls, which tend to attract the smaller species as mentioned above. • Bug/insect hotels. • Small carefully designed newt ponds, see guidelines relating to water bodies below. 	<p>Key Considerations: Open space and biodiversity section</p>
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pitched roofs forming part of this development we would request that the developers/owners enter into a robust Bird Hazard Management Plan to ensure that regular inspections are undertaken to ensure that Gulls do not utilise the roofs.

- We would ask that green roofs are not incorporated in this development as they are attractive to birds as they provide a food source. see AOA Advice note 3 'Wildlife Hazards Around Aerodromes' attached for your information.

Lighting

- Lighting must be carefully designed to ensure that there is no dazzle or glare to pilots, air crew and Air Traffic Control in the tower or that any proposed lighting cannot be confused with any aeronautical ground lighting.
- Lighting should be white lighting, where possible, full cut off with no light spill above the horizontal. No laser lights must be used in this location. see AOA Advice Note 2 'Lighting Near Aerodromes'

Renewables

- We would request that wind turbines do not form part of these proposals as the rotating blades have the potential to be seen by radar and cause 'clutter' on the radar screens.

Solar panels

May be acceptable subject to further investigation to ensure that there will be no glint or glare and that they are not in line of sight to radar as they have the potential to distort the beams. Please see AOA Advice note 5 'Renewable Energy & Impact on Aviation' attached for your information.

Reflective Materials

- If the proposed buildings have large areas of glass or highly reflective materials, depending on their orientation, location and size we may request that a solar hazard glare study is undertaken to ensure that there will be no dazzle or glare to pilots, aircrew and air traffic control.

Cranes & Construction Equipment

- Cranes and tall construction equipment have the potential to impact on airport

	<p>operations by way of infringement the protected Obstacle Limitation Surfaces (OLS) and/or impacting on navigational aids or instrument flight procedures (IFPs).</p> <ul style="list-style-type: none"> • Consideration needs to be given at an early stage as to how the buildings are to be constructed, for example the height of the cranes that will be required. For a site this close to the airport we would recommend that ‘telescopic’ cranes are used so that they can be lowered at short notice if flight operations require. Recommend that you contact gal.safeguarding@gatwickairport.com as soon as crane details are known for an assessment. <p>The crane operator must apply to Gatwick Airport Ltd for a crane permit at least one month before any crane is due on site. See AOA Advice note 4 ‘Cranes & Other Construction</p> <p>Please be advised that the advice given is informal and without prejudice to the consideration of any planning application which may be referred to us pursuant to Planning Circular 01/2003 in consultation under the safeguarding procedure.</p> <p>The information is correct at the time of writing, however it is subject to change and it cannot be assumed that any response to consultation under Planning Circular 01/2003 will necessarily coincide with the informal advice now given. We will not have any liability to you or third parties who may follow this advice.</p> <p>Provision of this advice does not constitute support for the development nor an opinion that the development is acceptable under local planning policy.</p> <p>Gatwick Airport Ltd, in line with the recently produced Gatwick Master Plan (July 2019), is progressing plans to routinely use the existing northern runway and that further assessments will need to be undertaken as part of that development on the acceptability of surrounding land uses.</p>	<p>Deliver section</p>
<p>RBBC’s Head of Economic Prosperity and Officer</p>	<p>Provided input to inform the 2021 Chilmark Report</p>	<p>Policy Context and land Uses sections</p>

	for review – no specific comments to add beyond above comments.	
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3. Next Steps

- 3.1. The Council's Planning Policy Service will hold a statutory consultation on the draft SPD, planned to be held for a minimum of four weeks between November 2021 and January 2022. We will invite comments by emailing and writing to the "specific" and "general" consultees, and "prescribed bodies" (for the Duty to Co-operate organisations) as specified in the Local Planning Regulations, and other individuals and organisations registered on the Council's Planning Policy database for planning consultation purpose.
- 3.2. We will also send letters to addresses within 1 km of the site and will involve Horley Town Council and will publicise the period for inviting comments on the draft SPD through Horley Town Council. Paper copies of the consultation documents will be made available for inspection at the six libraries in the borough subject to pandemic restrictions.
- 3.3. The consultation draft Supplementary Planning Document (SPD), the Sustainability Appraisal and Habitats Regulation Assessment Screening Statement, and the two commissioned reports that informed the draft SPD will be available on the Council's website on its [Planning Emerging SPD webpage](#).
- 3.4. Following the formal consultation period, this Initial Consultation Statement will then be updated with a list of who we consulted on the draft SPD, a summary of the comments received, and how those comments have been addressed in finalising the SPD.
- 3.5. The draft SPD will then be amended to take account of consultation responses received, and any other matter the Council thinks relevant (as specified in Section 23(1) of the Planning and Compulsory Purchase Act 2004 (as amended)).
- 3.6. The SPD will be put to the Council's Executive in March 2022 for adoption. Following its adoption, the SPD will be a material consideration to inform the production of a site masterplan by the site promoter in consultation with the Council, as required by DMP Policy HOR9 ("Delivery" requirements). The masterplan will need to be submitted to the Council at the outline application stage to assist the consideration of planning applications for the site's development.