

 Reigate & Banstead BOROUGH COUNCIL Banstead Horley Redhill Reigate	TO:	PLANNING COMMITTEE
	DATE:	28 September 2022
	REPORT OF:	Head of Planning
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AGENDA ITEM:	9	WARD: SWH - South Park and Woodhatch

APPLICATION NUMBER:	22/01796/CON	VALID:	12/08/2022
APPLICANT:	Surrey County Council	AGENT:	n/a
LOCATION:	LAND AT WOODHATCH PLACE, 11 COCKSHOT HILL, REIGATE, SURREY, RH2 8EF		
DESCRIPTION:	The erection of a part one, part two and part three storey building to provide a 5-form entry junior school, with two all-weather sports pitches, a MUGA pitch, a hard play area with netball court, and provision of car parking spaces and provision of a new internal access road with a new egress point on to Cockshot Hill, with associated hard and soft landscaping and off-site highways works.		
All plans in this report have been reproduced, are not to scale, and are for illustrative purposes only. The original plans should be viewed /referenced for detail.			

This is an application for determination by Surrey County Council and as such the Borough Council is a consultee to the application. The Borough Planning Committee is asked to agree the Borough Council's response as a consultee rather than decision maker.

SUMMARY

This is a consultation on an application made by and to be determined by Surrey County Council for a new school on land at Woodhatch Place, Cockshot Hill, Reigate (under Regulation 3 of the Town and Country Planning General Regulations 1992 which allows County Councils and other planning authorities to determine applications to develop their own land).

The Borough Council's response is intended to focus on planning matters only with operational matters (such as the convenience of location) being a matter for the County Education Authority. The response is informed on the basis of the application materials available in the limited time available to review and without consideration of all consultation responses or neighbour notifications, which will be sent directly to the County Planning Team.

The proposal relates to provision of a new school would enable the relocation of the Reigate Priory Junior School from its existing site in Reigate Priory Park to Woodhatch Place to provide a larger and modern school building and grounds. Both the existing and proposed schools are junior schools, for ages 7 to 11, with a capacity of 600 pupils.

The relocation of Reigate Priory School is funded in part by the Department for Education's (DFE) School Building Programme, as well as Surrey County Council, with the new school being built to the DfE's BB103 standard, being an operationally carbon neutral building and will provide an improved and up to date school building and facilities for the pupils of Reigate Priory Junior School.

The school would be part two, part three storey building housing a Junior school with five forms providing 600 places as well with two all-weather sports pitches, a MUGA pitch, a hard play area with netball court, and provision of car parking spaces and provision of a new internal access road with a new egress point on to Cockshot Hill, with associated hard and soft landscaping.

The proposal would result in development of Urban Open Space, could cause substantial harm to setting of Statutory Heritage Assets (Grade II listed Building and Reigate Conservation Area) and would cause Substantial harm to the setting and Significance of Designated Non Statutory Heritage Assets (Locally Listed Buildings and Locally Park and Garden), the harm of which must be balanced against the benefits of the scheme.

The design of the school building raises significant concerns, primarily from the height, scale and siting and the impact form views from the South of Reigate as it is considered to poorly relate to the park and surrounding buildings, combined with the sheer mass and materials the building would harm the character and appearance of the townscape.

The County Planning Authority would need to be satisfied that the travel impact of the proposed relocation and its impact upon air quality and the designated Air Quality Management Area in Reigate Town centre will not result in a significant adverse or unacceptable impact.

The scheme would derive significant public and social benefits, primarily in relation to the delivery of a funded 5 form entry Junior School and also in terms of the short term economic benefits of the construction programme.

However, and whilst a matter for the decision maker, when considering this and all other issues it is considered that, overall, when weighing up the community benefits against the substantial harm caused, objection should be raised to the consultation.

RECOMMENDED RESPONSE

Reigate and Banstead Borough Council objects on the basis of the following concerns:

- a) Lack of robust justification for the relocation of the school and the loss of Urban Open Space given alternative options for re-use, adaption and extension of the existing school are considered to exist and haven't been fully explored

- b) The substantial impact to the setting of Statutory Listed Building and Conservation Area (Designated Heritage Assets) and Locally Listed Buildings and Park & Garden (Non Statutory Designated Heritage Assets)
- c) The scale and design of the extension poorly relates to the parkland and surrounding buildings, which combined with the sheer mass and materials the building would harm the character and appearance of the townscape.

It will be for the decision maker to weigh this harm against the planning benefits in the planning balance when considering whether or not to grant planning permission for the proposed development although the Borough Council is not convinced that such benefits outweigh the harm or warrant a departure from Development Plan policy.

Furthermore, the County Council must be satisfied that robust transport modelling and highway safety audit of the proposal has been undertaken and that there would not be any significant adverse traffic impacts on the local highway network or any danger to public safety resulting from the proposal, noting the limited space available for parking/collections and narrow carriageways/pathways leading to and from the site.

Consultations:

Consultation is limited to internal departments within Reigate and Banstead Borough Council only as the full, wider consultation will be undertaken and reported by Surrey County Council as the planning authority responsible for determination of the application.

Environmental Protection team: no objections

RBBC Conservation Officer : Raises objection on the following grounds:

Listed Buildings and Historic Park & Garden

The proposal is in the grounds of Woodhatch Place (formerly & historically called Woodhatch Lodge), a locally listed building, being an elegant country house of 1796. The parkland of Woodhatch Place is locally listed as a Historic Park and Garden. The locally listed Hill House (in Hill House Drive) of 1855 and its former gardener's cottages and the former grounds form a group with Woodhatch Place, particularly in terms of the parkland setting and also significantly, the evergreen shrubbery on the western boundary. There is a significant number of smaller locally listed buildings in the immediate area and grade II statutory listed buildings, the 17th century Angel (in poor condition but currently being repaired) and Yew Cottage, Woodhatch Road immediately to the south. The heritage aspects in the 1980's for the Urban Open Land/Space designation included the historic park and also the greensand ridge in terms of its connections to the famous artist Samuel Palmer, as well as the recreational and landscape aspects. It is also part of the approach and therefore setting of the Reigate Conservation Area.

Objection from heritage conservation viewpoint

There is substantial harm to the setting of the locally listed Building, Woodhatch Place (formerly Woodhatch Lodge) and substantial harm to the Locally Listed Historic Garden due to the destruction of a significant percentage of the historic garden and harm to the setting of the rest of the garden. (The Historic Park & Garden designation covers all the application site and almost all the County site (except a NE corner adjacent to Smoke Lane) designation). Harm to the setting and approach to a number of locally listed buildings on Cockshot Hill including Hill House, Old Cottage (Vogan Close), Primrose Cottage & Rose Cottage, Rosebank Cottages etc. There is significant harm to the setting of the 17th century Angel, a grade II listed Building and the approach to Reigate Conservation Area.

I strongly object to this application from a conservation viewpoint particularly in terms of the principle of development being contrary to policy but also in the scale, form and detail, in terms of substantial harm in terms of the excessive height and scale and poor design of the proposed building, its cramped nature of site and overbearing nature causing substantial harm which I do not believe is outweighed by public interest.

Impact on Historic Park & Garden

The Historic Parks & Gardens SPD April 2020 (a revision of the old SPG) lists the site as "An 18th century park with good Victorian Shrubbery along Cockshot Hill". DMP Policy NHE9 notes, inter alia, aside from the general historic asset requirements, that

additionally for a historic park and garden, development will be required to avoid subdivision and features such as trees and distinctive planting (in this case the evergreen shrubbery along Cockshot Hill) should be retained or restored. The proposal in this case subdivides the site, and resulting in the loss of mature trees, as well as trees planted in the 1990's to maintain the historic garden tree species and parkland character, and causes damage to the historic shrubbery and hedge line to Cockshot Hill. I would expect a Historic Garden Management Plan to be produced as a starting point in terms of understanding the park and garden but this has not been provided. That said, as with Reigate Priory, the historic garden is a simple structure of open grass parkland interspersed with trees, an evergreen shrubbery of Holly, Yew and parkland trees to the western boundary and the backdrop of the greensand ridge. I consider as well as the damage to the western shrubbery, the school site and its hardstandings and buildings cover a substantial part of the historic garden designation and have a negative impact on the setting of the rest of the site. The school building is out of scale with the rest of the site and surrounding buildings and is on a new raised bund (which I feel may impact on the future health of trees along the western boundary).

The footprint, obtrusive striped appearance and out of scale height of the new school and hardstandings will cause substantial harm. The 3 metre acoustic fence will harm the verdant appearance along Cockshot Hill (and could have been placed behind the shrubbery). It is contrary to the Local Distinctiveness SPD and associated DMP policy in terms of harm to the parkway/green corridor along Cockshot Hill by thinning out the shrubbery and hedge line and views through the gaps and above the tree and shrub line of the tall and obtrusive school building, as well as car parking, substation, (bin store if not successfully screened), fences, signs and hardstanding, particularly in winter views. The artificial pitches would be an alien feature in the parkland landscape and the inappropriate boundary screen of oddly straight lines of trees is at odds with the existing informal landscape and a large number of fences crisscrossing the historic informal parkland harming its appearance, including the lassoing of the eastern woodland.

Design of school

I consider the scale and height of the school is particularly harmful. Scale is important and I consider the height of the building is out of scale with the park and surrounding buildings, both in terms of its out of character 3 storey height but also its placement on a newly raised high bank. This will not only have substantial harm within the park and setting of Woodhatch Place but also impact outside the park in terms harming the backdrop to listed buildings, and its visibility above the tree line, in gaps and in winter views, and harming the approach to the Reigate Conservation Area, as well as wider views from the south including the A217 and impacting on the appearance of the Greensand Ridge backdrop.

The Canon's David Richmond & Partner buildings were designed to be recessive and neutral, the headquarters set back so the 18th century house had prominence and Richmond's Belvedere buildings were designed to respect the low scale of the park and maintain the axial lie between Woodhatch Place and the end of the park with the woodland planting at the time designed to enhance the historic garden setting. The new school building at its higher level disruptive this with an obtrusive striped cladding emphasising the out of scale massing of the proposed school building, unbalance the

woodland setting and towering over the Belvedere buildings. This would be contrary to Policy DES1 of the DMP as new development should respect the character of the surrounding area, which it does not in this case.

Green Corridor and Parkway

Green corridors are noted in the DMP as an important part of green infrastructure. The RBBC Local Character & Distinctiveness Design Guide Supplementary Planning Document June 2021 notes on page 85 define “Green corridors or parkways” as where “developments or housing estates are set back behind an existing hedge, including country lanes, to keep the feeling of moving through countryside, where the hedges and tree backdrop form the enclosure so the soft landscape is the dominant character, (and) has been an important planning tool in the borough since the early 20th century.” In the case of Cockshot Hill the early 19th century western shrubbery boundary of “Woodhatch Place” and the existing tree and shrub lined 1920’s Parkway verge on the west side of Cockshot Hill give a leafy and semi rural approach to Reigate. In that respect I consider the current proposals are harmful to Policy NHE1 : Landscape Protection, NHE4 Green Infrastructure. (The Green Infrastructure Strategy includes the appreciation of cultural heritage). The importance of Cockshot Hill as a leafy and semi rural approach to Reigate is harmed by this proposal.

Urban Open Space

The Greensand Ridge backdrop of the north part of Woodhatch Place and the parkland around Woodhatch Place are defined as Urban Open Space and the heritage and landscape aspects were an important consideration of the designation of the Urban Open Space on this site in the 1980’s and 1990’s. I consider the proposal is contrary to Policy OSR1. The reference to expansion of an existing school in the policy is in relation to existing schools within Urban Open Space, not the provision of new schools.

Statement of Need

As with many former country houses , the use of Reigate Priory as a school is an excellent use, both for education and for the historic building, with the classrooms making best use of the large rooms, rather than the problematic subdivision caused by other uses such as residential. There no reasons why the school should not remain in the existing Reigate Priory building with redevelopment of the rear 1950’s block to the same scale as the Priory and using extensions on the rear Victorian elements, glazing of the Victorian rear courtyard and using the Victorian wings for classrooms, with the older more ancient parts for ancillary uses and staff. It is considered a footbridge link at first floor level between the Victorian wing and the 1950’s block is possible or even moving the 1950’s built form south if a right of way and landscaping of the same width were provided to the north ie a direct swap. Both of these solution would address the safeguarding issue of the right of way. Officers consider there are a number of areas where lifts and staircases could easily be placed in the Priory building. The Building Bulletin 103 (BB103) Area Guidelines for Mainstream Schools are for new school developments so should not be applied to existing historic buildings and are in any case supposed to be applied flexibly. There is ample opportunity for new classrooms and the Victorian wing has good room sizes and reasonably wide corridors. The Priory has operated successfully as a school for over 70 years, and is considered to be a unique learning environment in a Grade I historic house and park. Whilst upgrading will be ongoing, the general repairs have already been identify some

years ago and despite delays, are already committed to as part of an ongoing program. The kitchen and dining room could be moved and enlarged. I therefore considered that the existing Priory school can be extended and upgraded for continued school use. (The October 2020 reference in the application documentation is to a proposal for a new school in the grounds of the Priory. This was problematic in terms of scale and operation. This is different to the first proposals in 2019 for upgrading and extending the school which we considered were workable, if appropriate detailed)

I am also doubtful about the site selection process in terms of suitability as in some cases the Conservation Area designation is not referred to. I would agree that the northern end of the Woodhatch Place site is not suitable for any development due to the impact on the Greensand Ridge, important to the character of Reigate, and the historic park and garden itself , including wider views.

Brief Local History of the "Woodhatch Place" site

The Greensand Ridge at Woodhatch attracted a number of residences in the late 18th century due to its landscape location. In 1796 the house and park are believed to have been constructed. In 1809 it was described as "romantically situated and commanding extensive and richly diversified prospects" and the locally listed mansion, which survives today, was described as "admired by all who see it. The road (ie Cockshot Hill) appears to derive a consequence from having such an ornament on its bank". It had a shrubbery which was extended along the length of Cockshot Hill as the western boundary in the 1820's and is a major feature of the historic park and garden designation but which will be substantially harmed by the present proposal. The Greensand ridge backdrop attracted the famous romantic landscape artist Samuel Palmer to live at The Chantry, a grade II listed building just to the east of Woodhatch Place. In the Historic Gardens SPD the parkland is described as a good example of the 18th century informal landscape movement. The parkland of Woodhatch Place was substantially planted in the late 19th century with ornamental trees including Cedar of Lebanon and Wellingtonia, and some of these trees survive at present and the major character of the site, apart from the shrubbery to the western boundary was and is an example of the English informal landscape (as typified by Capability Brown)m, with informal lawned parkland interspersed with trees. In 1959 in the book "Buildings in the Country " Paul Mauger described how this was an example of offices (at the time Crusader Insurance) moving into the countryside, but what started as respecting the setting of the Regency mansion, park and fine trees in the 1930's, was harmed by the overlarge 1950's extension. The out of scale Victorian and 1950's extensions were removed in 1995 by a finely well designed and respectful office complex by the architects David Richmond & Partners which restored the 18th century mansion and parkland setting. There were negative elements but the high quality design and unobtrusive materials and respect for the heritage assets were praised nationally in the architectural press at the time. In 2005 flats (replacing a sports pavilion) were built at the bottom of the hill but required to be low in scale to respect the park and the setting of the locally listed mansion. The design and materials of the flats, called the Belvedere were carefully designed to be as low in scale as possible and to read as a traditional parkland feature in keeping with the park, in 2005 . The property has been recently purchased by the County Council in 2020. (Any use or reference to the name "Woodhatch Place" above is in relation the present application site, being the Surrey County Council Building, formerly the Canons site, on the east side of the Cockshot Hill. It should be noted however for those research the local history that the original

Woodhatch Place, a substantial 16th century mansion stood on the west side of Cockshut Hill until 1786 when it was rebuilt, and then demolished subsequently in the 1960s, and only the 16th century garden wall survives on that side of the road at the entrance to the Nursery as well as the later 18th century Old Cottage .).

Representations:

As the Council are a consultee to the proposed development responsibility for publicity and neighbour notification rests with the County Council. Notwithstanding this 86 representations have been received and have been forwarded to the County Council for consideration. The following issues were raised:

Issue

Traffic congestion
Parking
Poor location and accessibility
Road and Pedestrian Safety
Unsuitable access
Inadequate Travel Plan
Loss of Urban Open Space
Ecological and Biodiversity impact
Current building capable of adaptation
Impact on Reigate Priory (Grade I)
Impact on Woodhatch Lodge (local listed building)
Impact on Woodhatch Place (local Listed Park and Garden)
Poor Design
Impact on the character and appearance of the area
Landscape impact
Impact on trees
Impact on neighbour amenity
Noise impact and pollution
Air pollution
Flooding concerns
Climate change
Impact on the town centre and economy

Support for relocation
Improved access

Note: Copies of all the letters of representation received have been forwarded to SCC to be reported and taken into account in the assessment of the application by SCC.

1.0 Site and Character Appraisal

- 1.1 The application site is located on land to the south of Woodhatch Place, Cockshot Hill, Reigate. The site is presently in the ownership of SCC and forms part of the wider Woodhatch Place site where SCC has recently moved many of their administrative operations to the existing office building which occupies the centre of the wider site. The red line of the site extends to some c2.55ha (6.3 acres) of land, whilst the area of the school is c2.4ha (c5.9 acres).
- 1.2 Woodhatch Place site is comprised of open grassland with some wooded areas, and the topography of the site is has an incline in the land levels running from south to north with the incline becoming steeper towards the north of the site. In the centre of Woodhatch Place are the SCC office buildings which are 3 storeys in height and of modern design. South of the office building is Woodhatch Lodge which is a locally listed building. This building is a two-storey 18th Century building which is finished in a whitewashed render and has a slate hipped roof design.
- 1.3 Vehicular and pedestrian access to the site is gained via Cockshot Hill (A217) to the west of the site with the internal access to the car park passing the office building to the west.
- 1.4 The site is designated as a Locally Listed Park and Garden and the grounds were subject to extensive re-landscaping during the development of the former modern building now occupied by SCC. It is also designated as Urban Open Space within the DMP and there is a band of trees bordering Cockshot Hill which are subject to TPO.

2.0 Relevant Planning and Enforcement History

- 2.1 None relevant

3.0 Proposal and Design Approach

- 3.1 This full application to be determined by Surrey County Council is for a new five form primary school for up to 600 pupils and two all-weather sports pitches, a MUGA pitch, a hard play area with netball court, and provision of car parking spaces and provision of a new internal access road with a new egress point on to Cockshot Hill, with associated hard and soft landscaping.
- 3.2 The building would measure around 77 metres in length and 23 metres in width at its widest part and would have an overall height of 12.7 metres. The part 2 storey element would have an overall height of 7.63 metres. The school building would be finished in a buff brick for the 2 storey element and the ground floor of the 3-storey element with the upper floors of the 3 storey element being finished in cladding in the school colours of red and white with grey stripes.
- 3.3 Vehicular access would be gained from Cockshot Hill via the existing access to the wider Woodhatch Place site. A new internal access road is proposed which would run from the existing access to a new egress point proposed south of the

existing access. 12 car parking spaces would be located south of the existing access with 28 spaces proposed to the west of the internal access road and 17 to the east of the internal access road. 3 disabled spaces and 2 minibus spaces would be located in front of the school building.

- 3.4 The background to the proposal is that Reigate Priory School has been identified by the Department of Education (DoE) Priority School Building Programme 2 as a school whose accommodation does not meet the DoE standards and being not fit for purpose for educational purposes. The programme targets the immediate replacement or refurbishment of such schools.
- 3.5 The applicant advocates that the existing Priory School is a Grade I listed building and Scheduled Monument requires regular maintenance and repair, whilst not providing optimum classroom sizes or standards. In addition, due to the museum located upon the site and a public right of way running through the premises poses a unsatisfactory arrangement and safeguarding issue an fails to meet DoE standards.
- 3.6 The school building programme, DOE and SCC also forward that the DoE and SCC have considered the redevelopment of the existing school site, but due to the historical significance of the Priory and its grounds it is contended that these issues would potentially impact on the delivery of new school facilities and also increase costs both now and in the future.

4.0 Policy Context

4.1 Designation

Urban Area
Urban Open Space
Locally listed park and garden
Flood Zone 1
Setting of Grade II Listed Building
Setting of Conservation Area

4.2 Reigate & Banstead Borough Core Strategy

CS1 – Presumption in favour of sustainable development
CS2 – Valued landscapes and the natural environment
CS4 – Valued townscapes and historic environment
CS5 - Valued people and economic development
CS7 – Town and local centres
CS10 - Sustainable development
CS11 – Sustainable construction
CS12 – Infrastructure delivery
CS17 – Travel Options and accessibility

4.3 Reigate and Banstead Local Plan – Development Management Plan

DES1 – Design of new development
DES8 -Construction management

DES9 – Pollution and contaminated land
OSR1 – Urban Open Space
TAP1 – Access, parking and servicing
CCF1 – climate change mitigation
CCf2 – Flood risk
NHE1 – Landscape protection
NHE3 – Protecting trees, woodland areas and natural habitats
NHE4 – Green and blue infrastructure
NHE9 – Heritage assets

4.4 Other Material Considerations

National Planning Policy Framework

Other

Human Rights Act 1998
CLG Policy statement – ‘Planning for schools development’ – August 2011

5.0 **Assessment**

5.1 As a consultee, the Borough’s main focus will be on the main planning impacts of the application, rather than more detailed aspects of the proposals or the non-planning matters, such as convenience of location which is a matter for the County Education Authority.

5.2 The main issues to consider are:

- Current site of Priory School
- Design Appraisal
- Non Statutory heritage assets
- Neighbour amenity
- Transport, Access and parking
- Air Quality
- Other issues

Current site of Priory School

5.3 The continued use of Reigate Priory and potential adaptation of the building would be supported by the Borough Planning Authority. The use of the priory (a former country house) as a school is considered an excellent and compatible use both for education and for the historic building. Teaching makes good use of the large rooms, rather than the potential problematic subdivision caused by other uses such as residential.

5.4 The submission by the applicant is noted and specifically with regards to the maintenance and repair, classroom standards, safeguarding and that the County Council have considered the redevelopment of the existing school and conclude that these issues may potentially impact delivery of new school facilities and also increase costs both now and in the future.

- 5.5 The Borough Planning Authority does not fully agree with this assessment and considers that the school could remain in the existing Reigate Priory building with redevelopment of the rear 1950's block to the same scale as the Priory and using extensions on the rear Victorian elements, glazing of the Victorian rear courtyard and using the Victorian wings for classrooms, with the older more ancient parts for ancillary uses and staff.
- 5.6 A footbridge link at first floor level between the Victorian wing and the 1950's block is possible or moving the 1950's built form south if a right of way and landscaping of the same width were provided to the north could be explored. Both of these solutions would address the safeguarding issue of the right of way.
- 5.7 Officers consider there are a number of areas where lifts and staircases could be placed in the Priory building. The Building Bulletin 103 (BB103) Area Guidelines for Mainstream Schools are for new school developments so should not be applied to existing historic buildings and are in any case supposed to be applied flexibly. There is ample opportunity for new classrooms and the Victorian wing has good room sizes and reasonably wide corridors.
- 5.8 The Priory has operated successfully as a school for over 70 years and considered to be a unique learning environment being in a Grade I historic house and park. Whilst upgrading will be ongoing, the general repairs have already been identified some years ago and despite delays, are already committed to as part of an ongoing program. Officers consider that the existing Priory school can be extended and upgraded for continued school use.

Urban open space

- 5.9 The site is within and would result in the partial loss of designated Urban Open Space, being located within the grounds of the grounds of Woodhatch Place, the former Canon campus and new Surrey County Council campus. The site while screened by landscaping and railings along the length of Cockshot Hill, remains open in terms of its character and appearance and contributes greatly to the verdant townscape, specifically from the Southern approach to the town.
- 5.10 The application is supported by an urban open space assessment which considers a number of alternative sites for relocation of the school, all of which are dismissed. It is agreed that, bar the retention of the existing Priory site for continued school use, the other sites can be fairly discounted. As stated above however, it is disputed that the existing site cannot be adapted and extended to enable its continued school use.
- 5.11 Policy OSR1 of the Reigate and Banstead Local Plan Development Management Plan states that any other development which would result in the full or partial loss of designated Urban Open Space will only be permitted in exceptional circumstances where the loss of openness resulting from the proposed development would not have an adverse effect on local character, visual amenity or ecological value.

5.12 Where such circumstances are permitted the policy requires either

- that clear evidence to demonstrate that the site is surplus to requirements and does not make a significant contribution to the recreational, community, ecological or amenity value of the area
- Provision is made for appropriate and suitably located replacement open space of the same type and of at least equivalent quality and/or quantity. Replacement open spaces should be located as close to the lost open space as possible
- The proposal is for the expansion of an existing school, the need for which clearly outweighs the loss of the urban open space

5.13 The application suggests that, as a relocation of an existing school, the third bullet could be applied although this is disputed. The is intended to be applied to existing school sites already situated within urban open space, seeking to extend rather than cases where a school is to be re-sited into urban open space.

5.14 The Borough Council does not consider the urban open space of the proposed site to be surplus to requirements or that it does not make significant relevant contributions to the area.

5.15 As covered later in this report there are significant concerns that the development would result in substantial harm to the heritage assets, high levels of harm to the townscape and local character including views and visual amenity and the proposals fails to make any Bio Diversity net gains upon the site.

5.16 The site is not considered surplus to requirements and appropriate open space has not been provided. Finally, the proposal is seeking to relocate an existing school and the Borough Planning Authority consider that there is a good opportunity to extended, upgraded and retain the current Priory school at its existing site.

5.17 As no replacement provision of open space is proposed, the proposal would thereby appear to represent a departure from Policy OSR1 of the Development Management Plan.

5.18 The County Council Planning Authority will need to consider carefully whether such exceptional circumstances apply in this case to warrant a departure from policy. However, if the existing school can be adapted and extended for continued use it is contended that such considerations would not apply.

Design

5.19 Concern is raised with regards the design of the school and its impact upon the character and appearance of the area, the views and landscape from the South of Reigate. The siting, height and scale of the school is identified as particularly harmful as it would poorly relate to the park and surrounding buildings,

combined with the sheer mass and materials the building would harm the character and appearance of the townscape.

- 5.20 The building extends some 77 metres in length and 23 metres in width at its widest part and would have an overall height of 12.7 metres. The part 2 storey element would have an overall height of 7.63 metres. The school building would be finished in a buff brick for the 2 storey element and the ground floor of the 3-storey element with the upper floors of the 3 storey element being finished in cladding in the school colours of red and white with grey stripes.
- 5.21 The height of the building is considered to be out of scale with the park and surrounding buildings, due to its 3 storey height and siting on a newly raised high bank which exacerbates longer views and impacts resulting in substantial harm within the park and setting of Woodhatch Place but also impact outside the park in terms harming the backdrop to listed buildings, and its visibility above the tree line, in gaps and in winter views, and harming the approach to the Reigate Conservation Area, as well as wider views from the south including the A217 and impacting on the appearance of the Greensand Ridge backdrop.
- 5.22 It is acknowledged that there are modern interventions within the surrounding landscape, but each of these are considered sensitively designed and do not cause harm such as the proposed. The SCC office buildings were designed to be recessive and neutral, and were set back so the 18th century house had prominence. The Belvedere buildings were designed to respect the low scale of the park and maintain the axial lie between Woodhatch Place and the end of the park with the woodland planting at the time designed to enhance the historic garden setting. The new school building at its higher level is disruptive and striped cladding emphasising the out of scale massing of the proposed school building, unbalances the woodland setting and towering over the Belvedere buildings.
- 5.23 This new building is considered contrary to Policy DES1 of the DMP as new development should respect the character of the surrounding area, which it does not in this case.

Heritage

- 5.24 The proposal lies in the grounds of Woodhatch Place (formerly called Woodhatch Lodge), a locally listed building dating from circa 1796. The parkland of Woodhatch Place is locally listed as a Historic Park and Garden. The locally listed Hill House (in Hill House Drive) of 1855 and its former gardener's cottages and the former grounds form a group with Woodhatch Place, particularly in terms of the parkland setting and also significantly, the evergreen shrubbery on the western boundary.
- 5.25 There is a significant number of smaller locally listed buildings in the immediate area and grade II statutory listed buildings, the 17th century Angel (in poor condition but currently being repaired with active encouragement from the Borough Council) and Yew Cottage, Woodhatch Road immediately to the south. The heritage aspects in the 1980's for the Urban Open Land/Space

designation included the historic park and also the greensand ridge in terms of its connections to the famous artist Samuel Palmer, as well as the recreational and landscape aspects. It is also part of the approach and therefore setting of the Reigate Conservation Area.

- 5.26 The Conservation officer advises there is significant harm to the setting of the 17th century Angel, a grade II listed Building and the approach to Reigate Conservation Area. Both are statutory designated assets, where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss,
- 5.27 Substantial harm is also identified to the setting of the locally listed building and historic park and garden due to the redevelopment and a significant percentage of the historic garden and harm to the setting of the rest of the garden. In addition it is advised that there is harm to the setting and approach to a number of locally listed buildings on Cockshut Hill including Hill House, Old Cottage (Vogan Close), Primrose Cottage & Rose Cottage, Rosebank Cottages etc. 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 directly or indirectly affect non-designated heritage assets, a balanced judgement is to be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 5.28 When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 5.29 In this case it is considered that the principle of development is contrary to policy but also in the scale, form and detail, in terms of substantial harm in terms of the excessive height and scale and poor design of the proposed building which is not considered to be outweighed by public interest.

Neighbour amenity

- 5.30 Policy DES1 of the Reigate and Banstead Local Plan Development Management Plan requires that all new development be of a high quality design that makes a positive contribution to the character and appearance of its surroundings and importantly not adversely impacting upon the amenity of occupants of existing nearby buildings, including by way of overbearing, obtrusiveness, overshadowing, overlooking and loss of privacy.
- 5.31 The relationship between the new building and outdoor facilities and their relationship with the neighbouring flatted development (Belvederes) on Hornbeam Road and to the south of the development are noted. The Local Borough Planning Authority does not pass any specific comment with regards to the likely impacts of the development upon amenity of adjacent occupiers but

requests that a detailed assessment by the Case Officer is made on this aspect to consider carefully the impact upon neighbours' amenities.

Transport, Access and parking

- 5.32 Vehicular access to the school would be gained from Cockshot Hill (A217) via the existing access to the wider Woodhatch Place site. A new internal access road is proposed which would run from the existing access to a new egress point proposed south of the existing access. The application is supported by a Transport Assessment which acknowledges that pupils arriving by car will increase in the short term although this may change with changing demographic trends across the catchment and a modal shift. The proposal provides 57 parking spaces, equating to one per FTE staff member. 3 accessible spaces and 2 minibus spaces would be located in front of the school building. 11 of the parking spaces would have electric vehicle charging points. Alongside the parking spaces would be provision for 26 pick-up/drop-off spaces. The TA suggests morning drop-offs would be shorter, with higher turnover of spaces than the afternoon (given the need for waiting) and therefore afternoon collections are proposed in to waves (representing 56 space capacity, 26x2). Further management is proposed in the form of ANPR access control and marshalling/staff assistance.
- 5.33 The Transport Assessment goes on in detail to model the on-street parking and traffic implications of the proposed development with these proposals in place. The County Highway authority have expertise in modelling and assessing the transportation impacts of development and it is requested that they robustly assess the proposal in this regard. It is outside the scope of the Borough Council's responsibilities to undertake this assessment. However, a significant number of objections seen by the Borough Council relate to issues of traffic, congestion and inconsiderate parking and so this matter should be given serious consideration.
- 5.34 Cockshot Hill experiences significant traffic and congestion which the proposal has the potential to exacerbate, particularly with regards the need to travel for those pupils in the northern part of the catchment. The carriageway and footway also seem narrow in parts and so improvements to pedestrian and cycling travel along Cockshot Hill would be necessary, especially given that a travel plan would be required to implement the modal shift envisaged.
- 5.35 Locationally the existing site would seem advantageous in terms of its accessibility and serious consideration must be given to the impacts associated with safely moving pupils, parents and staff to and from the proposed site. If approved, robust conditions would be needed relating to parking operational controls, travel plan monitoring and infrastructure improvements.

Air Quality

- 5.36 The proposals are a major development located several hundred metres to the south of a designated Air Quality Management Area (AQMA) located in Reigate Town Centre (no.9) and was designated in November 2007. The AQMA

(no.9) is located encompasses Reigate High Street, the section of Church Street between the High Street and Bancroft Road, properties with a frontage to Bell Street (between the High Street and the southern end of Bancroft Road) and land and properties within 15m of either side of West Street (between High St and Evesham Rd) and along London Road (between West St and Castlefield Rd).

- 5.37 An Air Quality Management Area (AQMA) is declared for an area where the local air quality is unlikely to meet the Government's national air quality objectives. Once an AQMA has been declared, the Council has to carry out further work to monitor the air quality in the area and identify what action can be taken to improve it.
- 5.38 Policy CS10 of the Reigate and Banstead Core Strategy 2014 requires that development be designed to minimise pollution, including air pollution. Policy DE9 of the Reigate and Banstead Local Plan Development Management Plan require attention be paid to AQMA's, with development only permitted 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 or 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.
- 5.39 The Local Borough Planning Authority does not pass any specific comment with regards to the likely impacts of the development upon Air Quality, but recommends that the formal consultation response highlights to the County Planning Authority the requirement to rigorously assess the likely impacts of the development upon Air Quality and in relation to the AQMA. It is advised that such an assessment will require to establish the baseline air quality, whether the proposal could significantly change air quality during construction and operation and should establish whether or users of the development could experience health impacts due to air quality.

Other issues

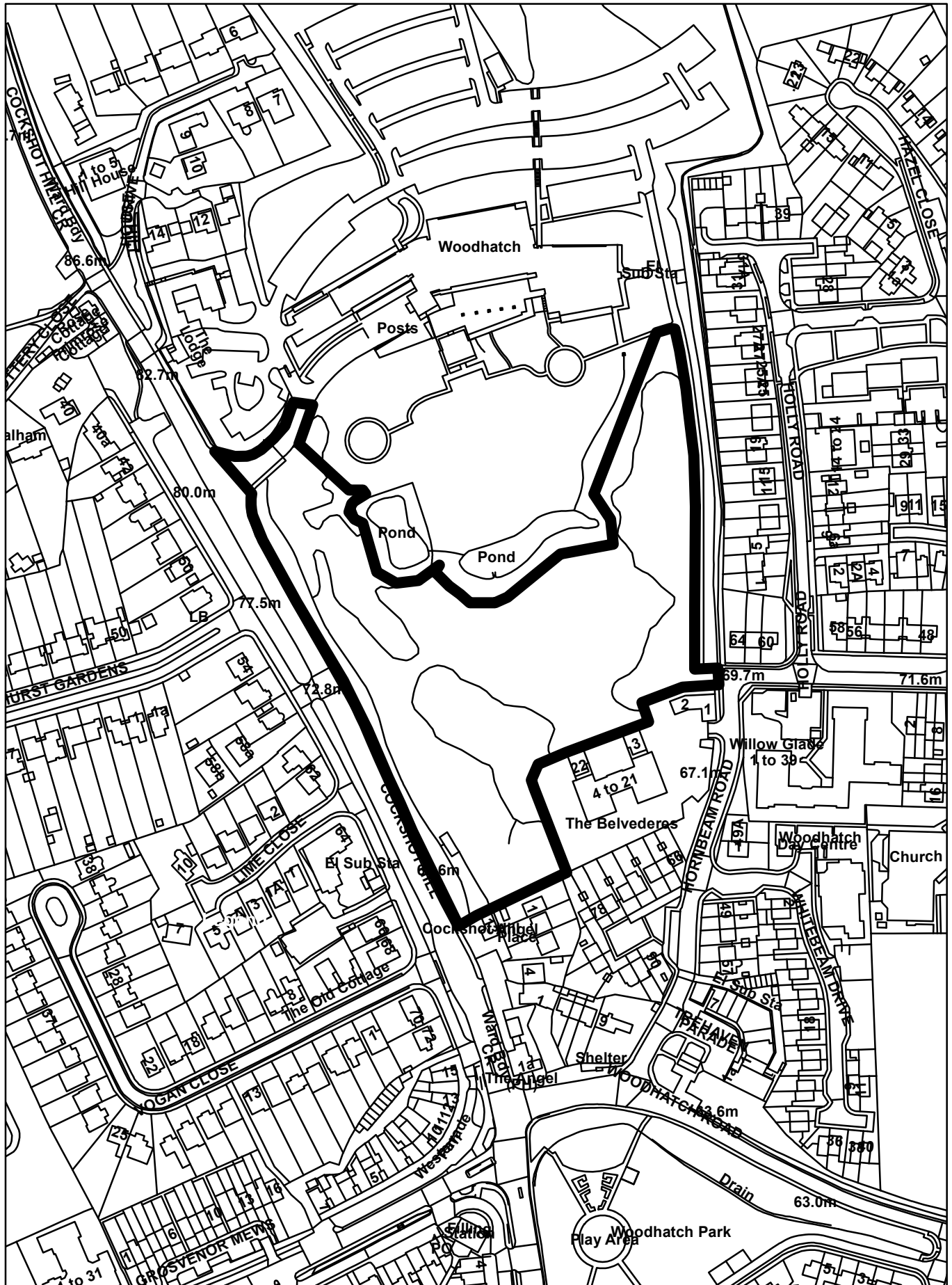
- 5.40 The significant increase in buildings and hard surfaces across the site has potential to impact surface water drainage. The application is accompanied by a surface water drainage strategy which it is requested by carefully assessed to ensure there would be no increased surface water flood risks.
- 5.41 The application is supported by a BREEAM Assessment which sees the development achieve a 'Very Good' scoring. This accords with DMP Policy CCF2 and should be required by condition.
- 5.42 An ecological impact assessment accompanies the planning application which identifies the potential impacts of the development upon protected species and how such impacts can be mitigated. It is recommended that the assessment be corroborated and that the recommendations are required through planning conditions, if approved.

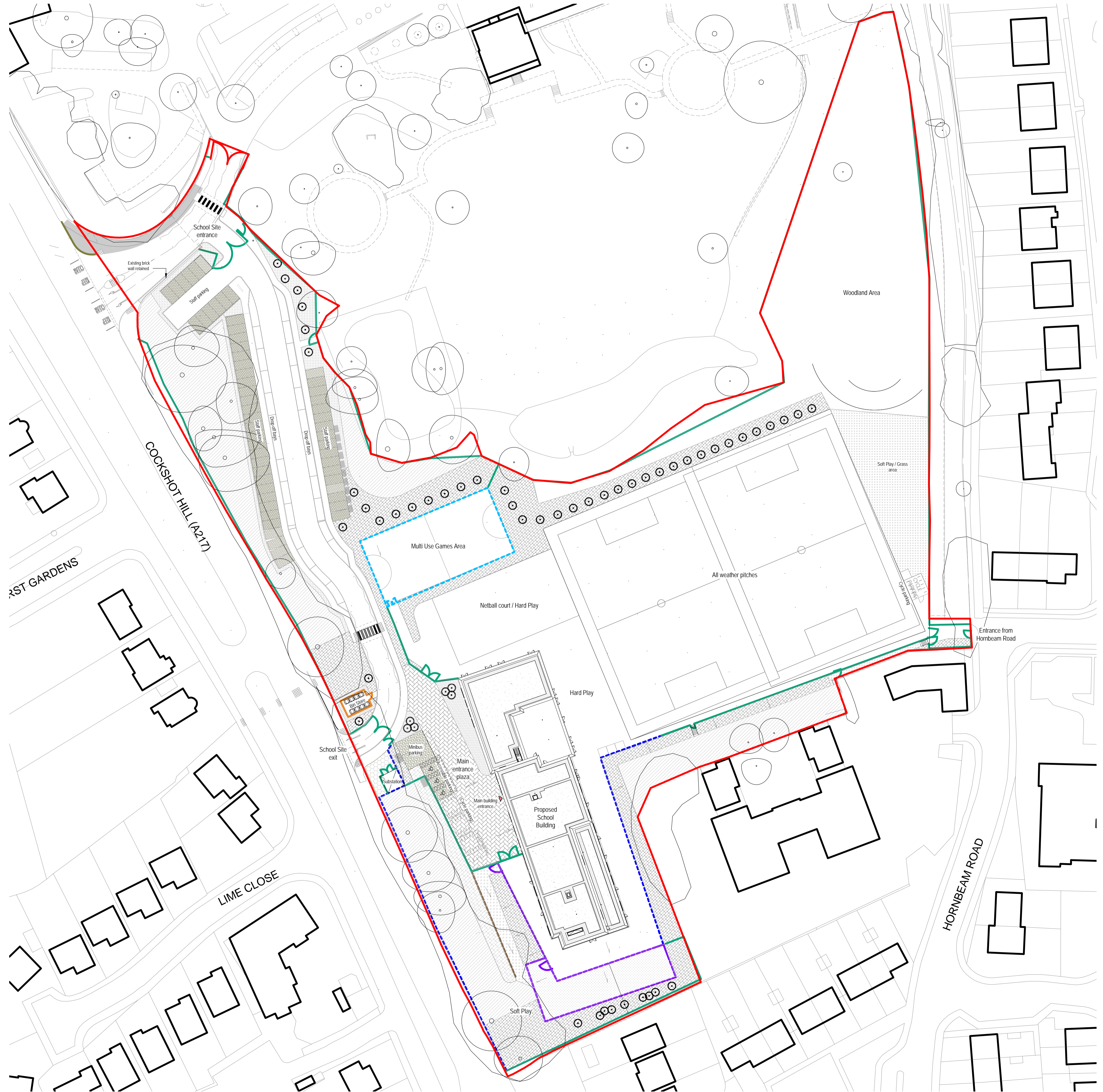
- 5.43 The application is also supported by a biodiversity net gain assessment which outlines measures to achieve a biodiversity net gain approaching 10% which is to be encouraged and should also form the basis of a condition, if approved.

6.0 CONCLUSIONS

- 6.1 The proposed development sees a replacement junior school being built within designated urban open space, within a historic garden and affecting the setting of various heritage assets and the character of the wider area. Concerns are raised with regards these impacts, especially given that it is considered that the existing school site could be adapted and extended to enable its continued use.
- 6.2 In light of the above identified harm the decision maker must consider the planning balance. This must consider the benefits of providing a purpose-built, modern education facility to DfE standards and associated energy efficiencies and other environmental credentials. It would also see the construction of modern play facilities and all weather pitches.
- 6.3 Whilst such benefits are to be given considerable weight, they ought to be offset by the fact that the existing building (being Grade I Listed) will continue to have high energy demands in any future use and the benefits in having an occupant compatible with its form and layout. Although there is benefit in achieving modern standards of classroom size and layout, meeting this ought not be a prerequisite in a converted building which provides its own benefits in terms of its unique learning environment. After all, many historic buildings are used for prestigious learning environments. There are benefits in overcoming conflicting rights of way and issues associated with the co-location with the museum but, similar to existing deficiencies relating to the layout and operation of the school, there are considered to be alternative options for adaptations and extensions, including incorporation of lifts for disabled access, which see such benefits reduced.

22/01796/CON Land At Woodhatch Place 11 Cockshot Hill Reigate RH2 8EF





- Notes:
- For full proposed building roof plan, please refer to drawing 1138822-NOV-V1-03-DR-A-PL07 - Proposed Roof Plan.
- For landscape plan, please refer to drawing 1138822-UBU-XX-XX-DR-L-1000_General Arrangement Plan.
- Development boundary
 - CP Electrical Vehicle Changing Point
- Boundary Treatment
- F1 3m high Timber acoustic fence
 - F2 1.2m high timber post and rail fence
 - F3 3m high sports fencing to MUGA
 - F4 2.4m high weldmesh fencing
 - F5 1.8m high timber h&miss vertical fencing (bin store)
 - F6 1.2m high weldmesh fencing
 - F7 1.2m pedestrian guard fencing
- For landscape fencing plan, please refer to drawing 1138822-UBU-XX-XX-DR-L-1003_Fencing Plan.



Amendments

No.	Description	Date	Issued by
2	Boundary treatment key added	25/01/2022	ZP
1	Issue for Planning Submission	25/05/2022	ZP

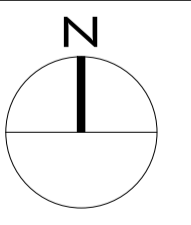
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Project Name:
Reigate Priory Junior School



Dwg Reference:
Proposed Site Plan

Drawn: BT Checked: ZP

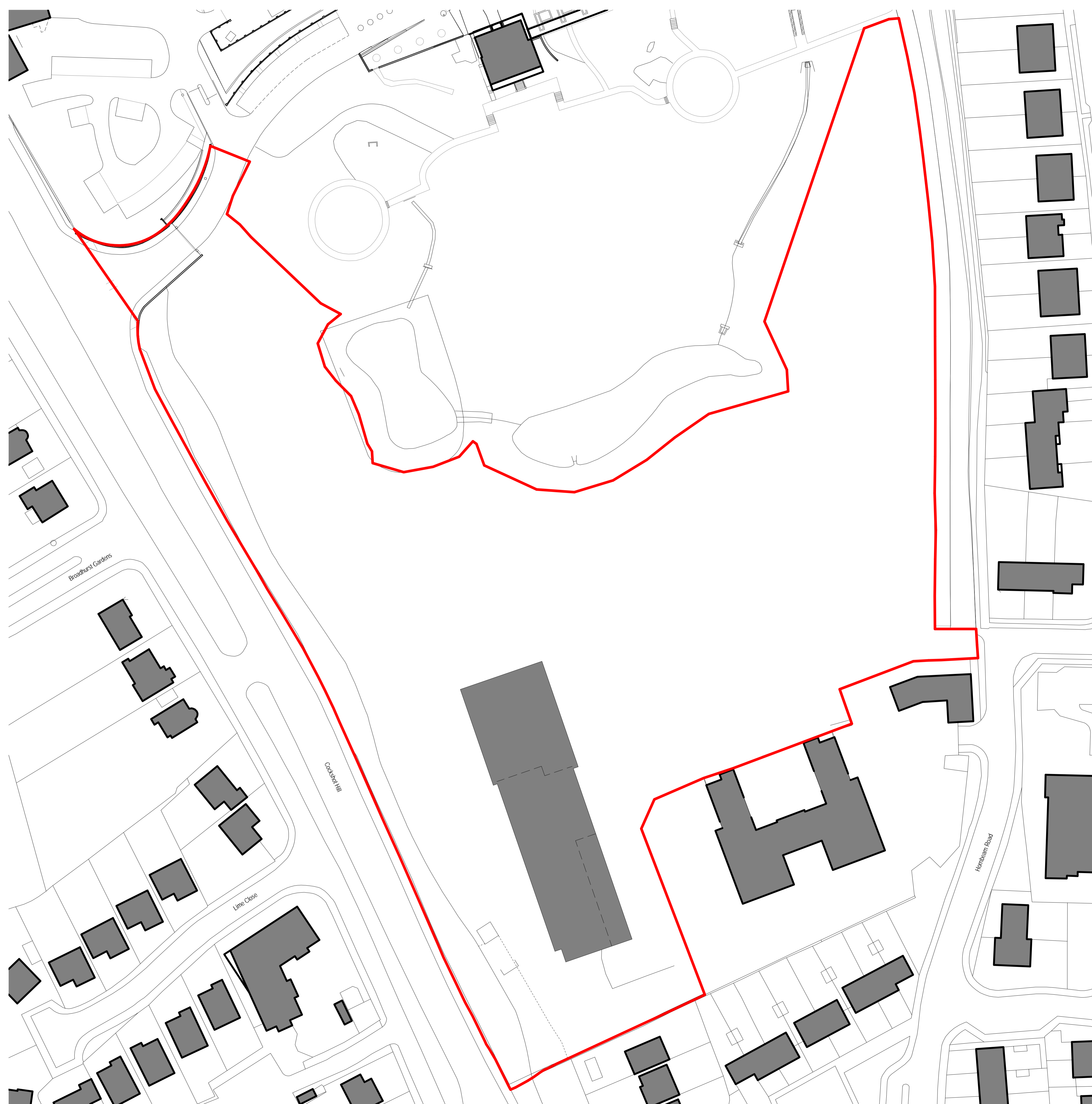
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Status: S2 For Information Orig Paper Size: A1

Revision: P02 Planning Submission Novium Job No: Z0606

1 Proposed Site Plan
1 : 500



Notes:



Amendments

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Project Name:
Reigate Priory Junior School

Dwg Reference:
Proposed Site Block Plan

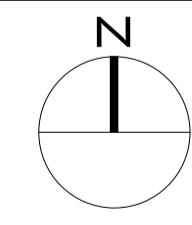
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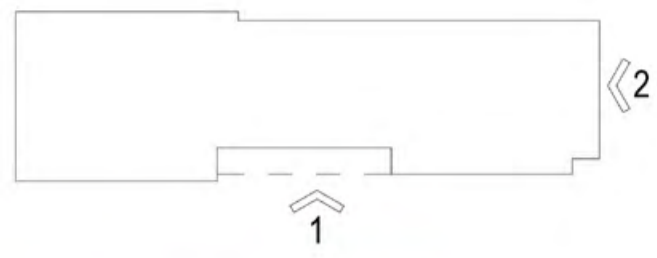
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S2	Information	A1

Revision:	Revision Description:	Novium Job No:
P0	Planning Submission	Z0606

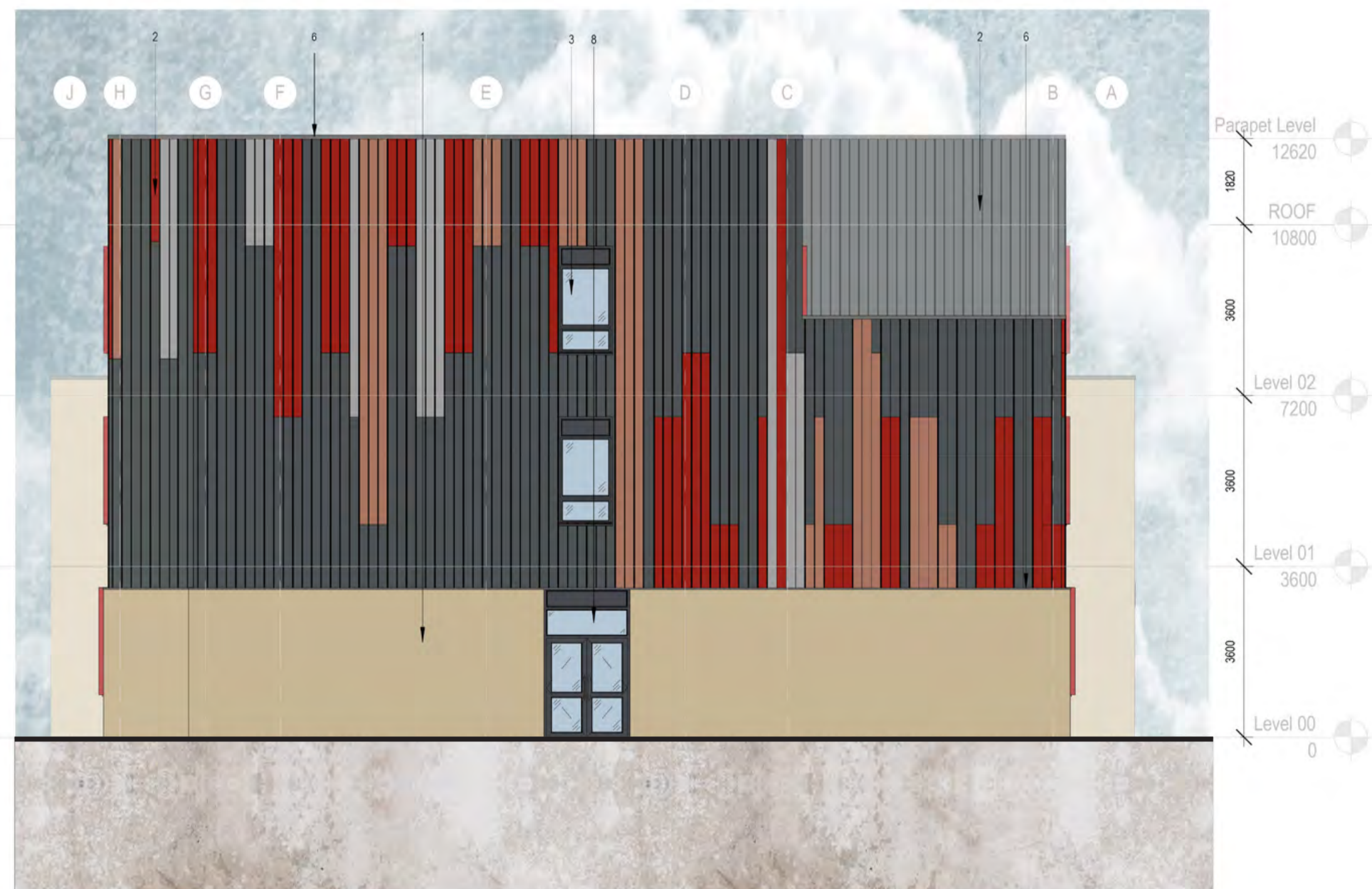


Notes:

Reigate Priory Junior School



1 West Elevation
1 : 100



2 South Elevation
1 : 100

Key:

- 1. Buff Brick
- 2. Metal cladding
- 3. Aluminium window with aluminium louvre and / or opening lights
- 4. Aluminium curtain wall
- 5. Metal doors
- 6. PPC Aluminium Coping
- 7. Proposed Signage
- 8. Glazed External Doors

Scale 1 to 100 1 0 1 2 5 Metres

Amendments

No.	Description	Date	Issued by
2	Issue for Planning Submission	25/05/2022	ZP
1	Issue for Planning Submission	18/05/2022	ZP

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Project Name:
Reigate Priory Junior School

Dwg Reference:
Proposed Elevations - Sheet 1 of 2

Drawn: JT Checked: ZP

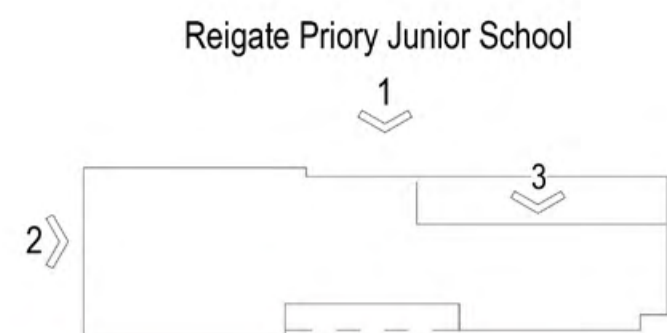
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Project:	Originator:	Volume:	Level:	Type:	Role:	Number:
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Status: S2 Suitability Description: For Information Orig Paper Size: A1

Revision: P02 Revision Description: Planning Submission Novium Job No: Z0606

Notes:



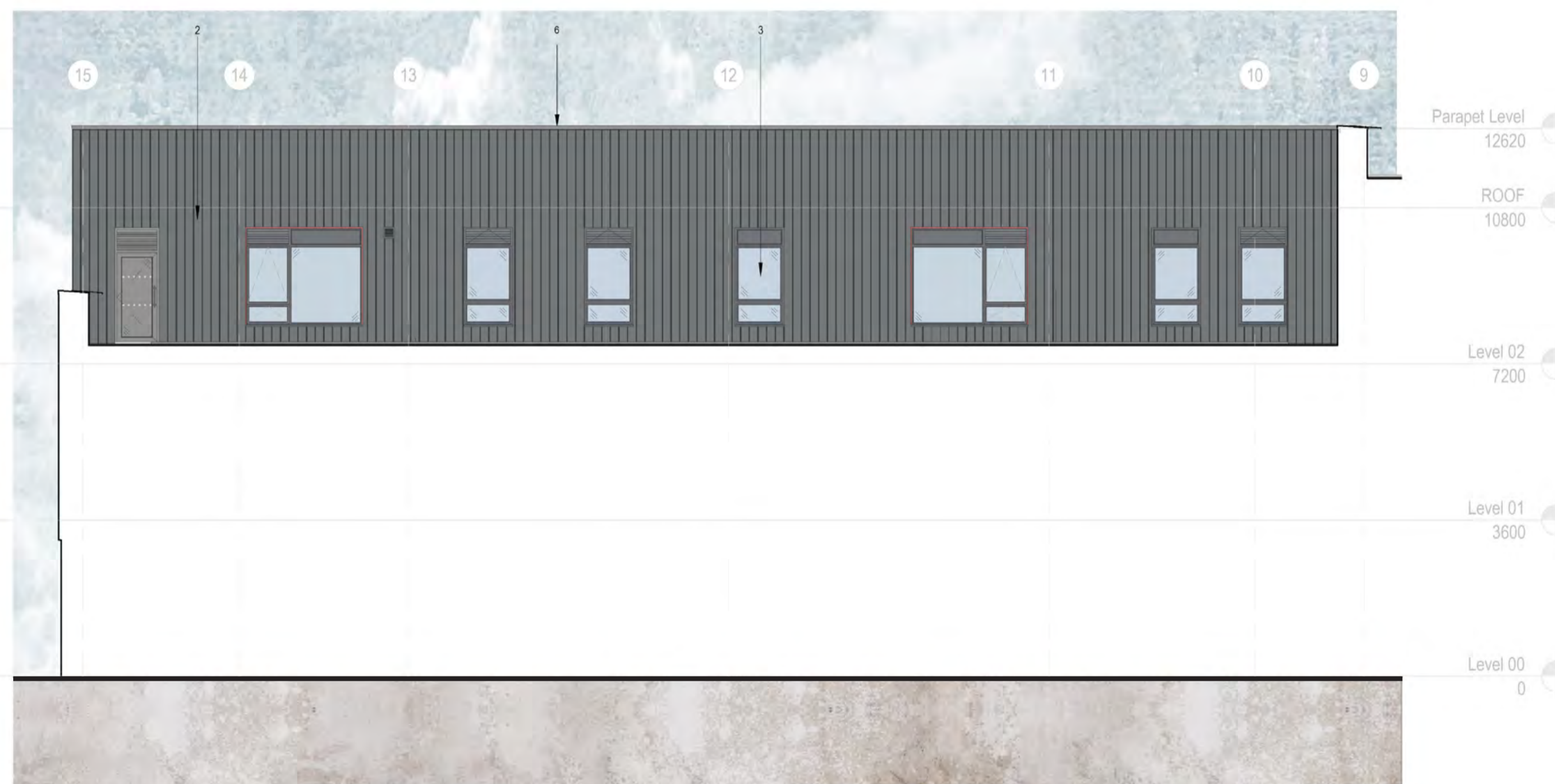
1 East Elevation
1 : 100

Key:

- 1. Buff Brick
- 2. Metal cladding
- 3. Aluminium window with aluminium louvre and / or opening lights
- 4. Aluminium curtain wall
- 5. Metal doors
- 6. PPC Aluminium Coping
- 7. Proposed Signage
- 8. Glazed External Doors



2 North Elevation
1 : 100



3 Hidden East Elevation
1 : 100

Scale 1 to 100

Amendments

No.	Description	Date	Issued by
2	Issue for Planning Submission	25/05/2022	ZP
1	Issue for Planning Submission	18/05/2022	ZP

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Project Name:
Reigate Priory Junior School

Dwg Reference:
Proposed Elevations - Sheet 2 of 2

Drawn: JT Checked: ZP
Scale: 1 : 100 @ A1 Project Issue Date: January 2022

Project:	Originator:	Volume:	Level:	Type:	Role:	Number:	
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Status:	Suitability Description:					Orig Paper Size:	
S2	For Information					A1	
Revision:	Revision Description:					Novium Job No:	
P0 2	Planning Submission					Z0606	