

Reigate & Banstead Borough Council

Development Management Plan Proposed Submission Document January 2018

Representations Form

How to submit your comments

This response form has two parts:

- Part A: Personal Details
- Part B: Your representation(s).

Both Part A and Part B of the representations form need to be completed in order for your representation(s) to be valid. Please fill in a separate sheet for each representation (Part B) you wish to make. You do not need to fill out Part A for each representation provided that all representations made are securely attached.

Forms must be returned to Reigate & Banstead Borough Council by
5pm on Friday 23 February 2018

You can return your form:

By post to: LDF Team,
Reigate & Banstead Borough Council
Town Hall, Castlefield Road,
Reigate,
Surrey, RH2 0SH.

Or by e-mail to: ldf@reigate-banstead.gov.uk

Alternatively you can complete this form on-line: www.reigate-banstead.gov.uk/dmp

All representations will be made available for public inspection.

Further guidance

The Council has published a guide on how to make effective representations. This can be downloaded from the Council's website www.reigate-banstead.gov.uk/dmp, or is available on request via the postal or email address above or by telephoning 01737 276000.

Part A

If an agent is appointed please complete only the Title, Name and Organisation boxes in (1) but complete the full contact details of the agent in (2).

(1) Personal Details

Title

Mr

First name

Simon

Last name

Fife

Job title
(if relevant)Organisation
(if relevant)

Savills

Address

Postcode

Telephone No

Email address

(2) Agents Details (if relevant)Wessex House
Priors Walk
Wimborne
Dorset

BH21 1PB

01202 856912

sfife@savills.com

The Council will keep your personal details for the purposes of contacting you regarding the Development Management Plan and its Examination. Please confirm whether you would like to be contacted (Note: if you request to take part in the Hearings, this will be taken as consent to be contacted)

I would like to be contacted regarding the DMP and its Examination

I would not like to be contacted further

Part B: Please use a separate sheet for each representation

(2) Name/Organisation

The Wilky Group

(3) To which part of the Development Management Plan: Proposed Submission Document does this representation relate?

Policy

HOR9

Paragraph

4.8.55

Box/map

Policies Map South

(4) Do you consider the Development Management Plan: Proposed Submission Document...

(a) Legally compliant?

Yes

X

No

Don't know

(b) Sound?

Yes

X

No

Don't know

(c) Complies with the Duty to Cooperate?

Yes

X

No

Don't know

(5) Please give details of why you consider the Development Management Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Development Management Plan or its compliance with the duty to cooperate, please also use this box to set out your comments.

1 Introduction

1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has had a long-standing interest in the provision of employment land within the Boroughs of Reigate and Banstead and Crawley (RBBC and CBC). It relates specifically to proposed Policy HOR9 of the pre-submission Development Management Plan (PSDMP), which proposes a strategic employment site and related uses on land extending to about 31 ha west of Balcombe Road, Horley.

1.2 TWG own about 60.3 ha (149 acres) situated to the east of Gatwick Airport and to the north and south of the M23 spur road between Junctions 9 and 9a. The land south of the M23 spur road (about 47.3ha / 117 acres) is 'Safeguarded Land' for the Gatwick Airport second runway landside facilities and falls within an Area of Search for a Strategic Employment Location (SEL) in the adopted Crawley Borough Local Plan 2015 (CBLP). The land north of the spur road falls within an area identified by RBBC for 'employment land in Horley' (business park). TWG is therefore a significant stakeholder in relation to the provision of future employment land and development in the Crawley/Gatwick/Horley area.

- 1.3 The Horley Strategic Business Park proposed under Policy HOR9 forms the western part of the 'employment land in Horley' proposal. The 'employment land in Horley' is the subject of a Joint Venture between the Council and a developer, and an in-principle approval to advance Compulsory Purchase Procedures to facilitate its delivery¹.
- 1.4 Since the publication of the Reregulation 18 DMP, the Council has undertaken a significant amount of further investigation into the employment requirements of the Borough to 2027 and beyond to 2035, and focused on the demand for office uses. The work adds significant new evidence to the previous work². Based on the 2014/2016 Regulation 18 evidence base, TWG raised concerns in its previous representations on the site selection process relating to Policy HOR9. However, in the light of the new evidence contained in the Strategic Employment Site Economic Assessment (SESA) by Chilmark Consulting that looked at likely demand up to 2035, TWG accepts that the need for the HOR9 proposed allocation. It is therefore acknowledged that there is significant demand and need for employment floorspace in the Crawley/Gatwick/Horley area, which the Council's evidence base confirms is focused on the provision of high-quality office space.

2 Borough-wide employment requirements

- 2.1 The Strategic Employment Site Economic Assessment (SESA) reviews the availability of B1 office space and to identify any shortfall in the context of the proposed strategic employment site at Balcombe Road, Horley, under Policy HOR9. The findings of the SESA were published in September 2017.
- 2.2 The SESA (Task 1) report has adopted the Government guidance on providing for economic development needs as set out in NPPG (Para: 030 ID: 2a-003-20140306) and represents a robust assessment of the local and sub-regional economic drivers and the need for economic infrastructure to meet future employment requirements.
- 2.3 Based on the analysis in the SESA, the following requirements for employment floorspace are identified (page 7, Executive Summary), to which has been added a notional land requirement (based on a typical plot ratio for a business park of 0.4: 4,000 sqm / ha³) – Table 1.

Table 1 – Future employment floorspace & land needs to 2035

Area from which need arises	Floorspace	Notional land requirement
Reigate & Banstead	66,442 - 80,885 m ²	< 20 ha
Crawley Borough unmet need	106,757 m ²	27 ha
FDI/relocation demand potential ⁴	10,000 - 26,000 m ²	< 7
Totals	< 213,642 m²	< 54 ha

¹ Reports to the RBBC Executive dated 15th October 2015 – "Use of Compulsory Purchase Powers to enable development of land south of Horley" and "Development of land south of Horley: Proposal to enter into a Joint Venture"

² Advice on scope for a new strategic employment site within Reigate & Banstead, Nathaniel Lichfield & Partners for Reigate and Banstead Borough Council, December 2014 and Strategic Employment Provision Opportunity Study, Reigate & Banstead Borough Council, June 2016

³ Employment Selection of Sites, East Hampshire District Council, June 2015 (para 3.20)

⁴ HOR9 Strategic Employment Site: Economic Assessment, Task 1: Supply and Demand Evidence, Chilmark Consulting, September 2017 (paras 3.104 – 3.109)

- 2.4 The data indicates that in relation to the need for B1 floorspace, there is a current requirement for at least 20 ha, which increases to 47 ha if the unmet needs arising from Crawley are taken into account. This increases to 54 ha through the addition of needs arising from FDI and national expansion and relocation.
- 2.5 The baseline requirements for floorspace and land to meet strategic need are therefore significant and support the allocation of the land **both east and west** of Balcombe Road as proposed in the Horley Business Park plan approved by the Council in October 2015 referred to at paragraph 1.4 of this representation and shown on the plan at **Appendix 1**.
- 2.6 Against this requirement, the Housing and Economic Land Availability Assessment (HELAA, December 2017) identifies a net supply of floorspace of only 2,399 sqm leaving an unmet or residual requirement of 211,234 sqm. The Horley Business Park west and east of Balcombe Road could address this need.
- 2.7 The evidence in the SESA (Task 1) indicates that the longer term demand for B1 office space is significant. This includes demand associated with the expansion of Gatwick Airport to 43 mppa under a single runway scenario based on airport growth assumptions from 2014 (para 3.118).

3 The economic potential at the ‘Heart of the Gatwick Diamond’

- 3.1 Gatwick Airport Ltd (GAL) has recently reviewed the expansion potential of the airport and concluded that the passenger throughput could be higher owing to larger aircraft and other operational changes. GAL is therefore proposing expansion up to 50 mppa, and would be significantly higher with a second runway. The potential in this context is referenced in representations to the Airports National Policy Statement (ANPS) by TWG (December 2017) attached at **Appendix 2**. In addition, there is evidence of greater demand associated with increased international business, inward investment, trade and connectivity as a result of Britain’s changing global trade arrangements: such potential is referred to in TWG’s representations on the ANPS. TWG is therefore proposing the opportunity for a wider review of an economic proposition around Gatwick Airport including a more mixed-use approach to development – An Airport City similar to the approach taken at many European airports and successfully being delivered in the UK around Manchester Airport.
- 3.2 The spatial planning and land use implications of future economic growth requires a more co-ordinated approach which will require collaborative policy-making between the local authorities that cover the heart of the Gatwick Diamond (Crawley/Gatwick/Horley). This could be delivered through a joint approach, with an evidence-based analysis of an Airport City proposition in the context of regional / sub-regional economic policy from the Local Authorities, the Coast to Capital LEP, Gatwick Diamond initiative, and GAL and landowners. TWG has called for such an approach in response to the Government’s Airport National Policy Statement consultation (**Appendix 2**)

4 Transport and access

- 4.1 The IDP identifies several schemes related to the Horley Business Park, namely the proposed access spur off Junction 9a; improvements for emergency vehicles and public transport from the site to Balcombe Road; capacity improvements to Gatwick rail station, and improvements to pedestrian and cycle infrastructure links between the

site and Gatwick train station and Horley Town Centre. The IDP notes the need for details to be confirmed through the Transport Assessment work for the site and for Highways England approval to the access to J9a.

- 4.2 Whilst connectivity to Junction 9a of the M23 remains a matter for detailed assessment, it is encouraging that the Coast to Capital LEP has identified a significant capital contribution to “unlock” the site and act as a catalyst for private sector investment. The M23 Smart Motorway Scheme, which is under construction on behalf of Highways England and due for completion in 2020, will also play an important part in delivering additional capacity in the Gatwick area. The precise access arrangements and how the impacts on the wider highway network are to be mitigated are under investigation by the promoters of the HOR9 proposed allocation.
- 4.3 Whilst the scale and extent of Investment by GAL in road and rail infrastructure and services is under review, there is clear commitment to enhancing capacity to reflect growth in the area. This is evidenced in the Gatwick Growth Board Connectivity Study published in July 2017 which identifies the employment growth corridors and transport connectivity to facilitate development. This illustrates the critical synergies between the various employment sites, including Gatwick Airport and Horley Business Park in delivering the necessary infrastructure.

5 Policies Map – South

- 5.1 TWG propose that the Policies Map (South) should show the wider Horley Business Park site both west and east of the Balcombe Road as proposed in the approved report of Reigate and Banstead Council in October 2015 and shown on the plan at **Appendix 1**.
- 5.2 The Gatwick Open Setting extending over the southern part of the HOR9 proposed allocation - Policy NHE1 (Landscape Protection) - requires that proposals for development must ensure that the separation of Horley and Gatwick Airport is maintained though retaining and strengthening tree and hedgerow boundaries and providing a landscaped buffer.
- 5.3 The Gatwick Open Setting also extends across the land east of the HOR9 allocation (east of Balcombe Road) across almost all the area identified as part of the wider Horley Business Park proposal and over land in the ownership of TWG. TWG acknowledge the need to maintain a green buffer to respect the setting of the airport, but it is considered that a reasonable and landscape-planning response to this objective suggests that the extent of the current designation across HOR9 could be reduced. It is therefore suggested that the depth of the Gatwick Open Setting designation across allocation HOR9 be reduced from about 80m to an average of about 50m to reflect an appropriate landscape buffer strip to achieve the desired outcome. In the context of identifying the full Horley Business Park proposal put forward by the Council in 2015, a similar approach to the extent of the Gatwick Open Setting would need to be adopted.

6 Conclusion

- 6.1 The Council has updated its economic evidence base through the SESA, which sets out a quantitative and qualitative case for the HOR9 proposed allocation based on demand from within the RBBC area, the unmet needs of Crawley and needs associated with FDI/relocation demand and the growth of Gatwick Airport. The SESA sets out the strength of the demand for employment development up to 2035, focused principally on office uses. The

evidence addresses the concerns raised by TWG in its representations in the Regulation 18 DMP relating to the site selection process – based on the qualitative, quantitative and spatial evidence in the SESA, TWG supports the proposed allocation west of Balcombe Road in the PSDMP. The future demand / needs of the area therefore justify the allocation of the Horley Strategic Business Park under Policy HOR9.

- 6.2 The proposed HOR9 site is located in an area subject to significant development pressure with consequent demands on highway and public transport capacity. The infrastructure and mitigation required to meet the needs of a major new employment site in this location will need to be assessed in the wider context of existing, ongoing and emerging strategic highway and public transport projects.
- 6.3 In this representation, TWG support the allocation of the HOR9 site, but would suggest that the nature of the landscape buffer should be amended and the site area should reflect the actual area allocated in the plan of 31 ha, not the 83 ha noted in Policy HOR9. The capacity assumptions for the development should be reviewed in this context.
- 6.4 The demand analysis undertaken in the SESA identifies the need for over 210,000 sq m of B1 floorspace and Policy HOR9 proposes an additional 10,500 sq m of support facilities. When the landscape buffer proposals (Gatwick Open Setting) and flood risk constraints are taken into account, there is likely to be a net developable area within the HOR9 site of about 18 ha. Based on the commonly used plot ratio of 0.4, the HOR9 site has potential to accommodate about 72,000 sqm of B1 development, which is significantly less than the 200,000 sq m and 10,500 sq m of community facilities identified as the capacity in para 4.8.55 of the DMP. TWG therefore suggest that the full Horley Business Park proposal as approved by Reigate and Banstead Council in 2015 and subject to the resolution of the Council to progress by way of a joint venture should be allocated to meet this level of demand.
- 6.5 TWG has responded to Government's latest National Policy Statement consultation on Airports and Aviation and requested the Government consider a more ambitious development plan around Gatwick in response to a range of wider and international economic considerations, introducing similar principles to an Airport City type development at the centre of the Coast to Capital economic area.

(continue on a separate sheet/expand box if necessary)

(6) Please set out what modification(s) you consider necessary to make the Development Management Plan legally compliant or sound, having regard to the matter you have identified at (5) above where this relates to soundness. You will need to say why this modification will make the Development Management Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

(8) If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

(9) If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

The Wilky Group owns a significant parcel of land to the east of the HOR9 proposed allocation, which forms part of the larger 'employment land in Horley' proposal being promoted by Reigate and Banstead Borough Council outside the Local Plan. As such, The Wilky Group is a key stakeholder with an interest in the promulgation of the Horley Strategic Business Park allocation via the Development Management Plan.

Please note: *The inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date: