

Planning Policy
Reigate and Banstead Borough Council
Town Hall
Castlefield Road
Reigate
RH2 0SH

23 February 2018

Dear Sir/Madam,

**Reigate and Banstead Development Management Plan DPD
Representations on behalf of Horley Business Park Development LLP**

We write on behalf of Horley Business Park Development LLP, to submit representations to the Draft Reigate and Banstead Development Management Plan DPD consultation, in particular focussing upon draft Policy HOR9 which seeks to allocate the site which is the subject of our client's interest.

Horley Business Park Development LLP ("HBPD") is a Joint Venture between Reigate and Banstead Borough Council, Millhill Properties (Horley) Ltd and Berwick Hill Properties with a remit to deliver the strategic employment site known as "*Horley Business Park*" ("HBP"), identified by draft Policy HOR9.

We welcome the allocation of HBP for employment purposes as well as the other complementary uses within the Policy. The Policy recognises the significant benefits that this allocation provides within the wider Gatwick Diamond area and the mutual benefits both to the future users of the business park by locating it close to Gatwick Airport and the benefits to the existing residents in Horley. As such, the principle of the allocation is wholly supported.

However, as drafted, Policy HOR9, together with related aspects of Policy NHE1 contain a number of issues which must be addressed to make the Plan "*sound*" and to maximise the prospects of delivering sustainable economic development at the site over the plan period. Indeed, this is required in order to perform the sub-regional role that is envisaged for the site and in order for it to deliver the maximum benefits for the wider area and community.

In summary, our case is that these policies, as currently drafted, fail the tests of the NPPF in terms of "*soundness*" as set out at paragraph 182 on the following bases:

- HOR9 is ineffective, containing unnecessary restrictions and could include a greater recognition of the role of other use classes as part of a high quality office led development and provide the wider benefits;
- HOR9 is unnecessarily restrictive and ineffective in terms of the proposed restrictions on use of the additional highway access to Balcombe Road;
- HOR9 and NHE1 are unnecessarily restrictive and unjustified in terms of the application of the "*buffer*" across the site (by means of NHE1); and
- HOR9 is unclear regarding the required comprehensive delivery of development across the entire site by means of a masterplan.

Representations

We generally support the allocation of Land West of Balcombe Road as a strategic, sub-regional, employment site which supports the wider vision of the Gatwick Diamond.

However, whilst recognising the positive support that the draft Policy affords we consider that the draft Development Management Plan DPD (Policies HOR9 and NHE1) is currently “*unsound*” because as drafted these policies, and, hence, the Plan:

- a) Does not support “*flexible use of land*” for the site allocation, and contain unnecessary restrictions in terms of the uses on site, making it ineffective:
 - as drafted HOR9 is silent on the acceptability of a number of use classes which would allow the provision of a business park which reflects the current occupier demand, such uses include a Hotel, Conference facilities, Sui generis, and Airport related activity.
 - The Council’s Evidence base points to an office orientated business park. Whilst HBP is committed to a predominantly office-based development, it feels that a degree of policy flexibility in respect of the mix of uses permitted would support the successful delivery of a high quality business park. The Policy should also allow sufficient flexibility to cater for shifting occupier sentiment in the future, facilitating an ability to cater for such uses coupled with limited B8. The implied prohibition of these uses is could constrain economic growth and undermine the long term success of the business park;
- b) Does not represent a “*clear understanding of business needs within the economic markets*” (Paragraph 160 and 161 NPPF), also making unnecessary restrictions in terms of the uses, making the Policy ineffective:
 - there is a clear market demand for B8 floorspace in the area, and HBP represents an opportunity to address some of this need whilst retaining its focus as an office orientated development.
- c) Fails to “*plan positively*” for HBP – as drafted Policy HOR9 is unnecessarily restrictive, ineffective and unjustified, and prevents economic growth:
 - The proposed limited vehicular access from Balcombe road has been poorly informed by a strategic highways assessment rather than Micro simulation.
 - The requirement for a buffer (along the Southern boundary) pursuant to NHE1 is overly restrictive, prevents delivery of a development quantum to meet the need shown in the Council’s evidence base.
- d) Does not “*plan strategically*” - The current Policy requires that the site should be master planned and developed in its entirety and not delivered piecemeal. There is scope to strengthen the policy wording for HOR9 requiring the agreement of a masterplan to ensure that all parties work together to deliver the allocation effectively, making the requirement clear.

Additional Use Classes at Horley Business Park (Policy HOR9) (pursuant to unsoundness reasons a) and b))

National Policy, within the National Planning Policy Framework (NPPF) is strongly supportive of sustainable, flexible employment provision in appropriate locations. The NPPF explains at paragraph 18 that,

“The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.”

Accordingly, the NPPF states that local planning authorities should, “*plan proactively to meet the development needs of business and support an economy fit for the 21st century.*” (para 20). The NPPF also

encourages local provision of jobs and infrastructure pursuant to preventing people travelling long distances. At paragraph 37, the NPPF states:

“Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.”

RBBC’s adopted Core Strategy (July 2014) identified, at Policy CS5, the need to “*promote and support*” economic prosperity and regeneration. Pursuant to this, the Policy requires that the Council, through future site allocations and development management policies would plan for:

“...a range of types and sizes of employment premises to cater for the needs of established, growing and start-up businesses; and ensuring sufficient flexibility to meet their changing needs and attract new businesses.”

Specifically, the Policy explains that RBBC will “*plan for the delivery of additional employment floorspace,*” including for new employment floorspace outside existing allocations and town centres where this is “*located in accordance with sustainability principles.*”

Of particular note, the Core Strategy justification notes RBBC’s position in the Gatwick Diamond and the extremely well-connected nature of the Borough. The justification notes that the Borough offers a “*strong strategic location for business*” (para 5.5.6). Furthermore, the justification notes the particular roles fulfilled by various localities within the Borough. Horley is noted in particular for its “*smaller office and industrial premises.*” (para 5.5.7). The Core Strategy explains that the Borough will “*continue to be influenced by its location within the Gatwick Diamond*” (para 5.5.8) with the goal of delivering an “*internationally recognised business location with a global future in a sustainable way*”.

The Core Strategy indicates that evidence demonstrates that there is increasing demand for both office and warehouse floorspace, and a consequent decrease in demand for industrial floorspace. However, the justification, rightly, reflects the longevity of the plan period and accepts the need for flexibility in terms of the employment floorspace delivered. The justification notes that for “*smart growth*” to occur, there needs to be a “*flexible approach [in place] that allows businesses to have the access to the right type of employment floorspace*” (para 5.5.12). The Core Strategy notes that the commercial market offers a wide choice as to type of floorspace, and, accordingly, considers that the planning regime should respond to this. The justification states, “*this [flexible provision] can be achieved through designation of a range of different types of employment area, and flexible employment policies to ensure that the market is able to respond to changing demands for different types or sizes of premises over the plan period.*”

The site, located adjacent to Gatwick Airport and in close proximity to the sustainable settlement of Horley, is a highly-accessible, sustainable location for employment. In light of the identification of a requirement for warehouse premises and the need for flexibility in employment provision, HBPD considers that the allocation under HOR9 should be widened to allow for some additional types of employment provision, notably provision for B8 (Storage and Distribution) at this location, together with additional, complementary uses such as a Hotel, conferencing facilities, airport related uses and other sui generis uses complimentary to an office focused business park.

Such policy flexibility would enable HBP to respond to the NPPF and Core Strategy Policy requirement to respond to market signals and deliver the flexible employment space that can adjust and respond to market signals over the plan period.

In support of this stance, HBP has commissioned the associated report (Economic Evidence Review) which is at **Appendix 1**. This provides support for the allocation for employment uses under HOR9 but also explains, with reference to market data, why (proportionately) additional employment uses such as B8 warehousing should also be included within this allocation having regard to its primary role as an office based business park.

Given that the provision of employment space and complementary uses at this location is evidentially justified, HBPD considers that the draft policy requirement, which seeks to secure an Economic Impact Assessment, is superfluous, would affect the effectiveness of the policy, and should be removed.

With reference to the evidence provided, we consider that the amendment to the Policy wording, as set out in the **Annex** will enable the Development Management Plan Policy HOR9 will provide for sustainable and flexible employment provision at this location. The revised Policy would underpin the NPPF and Core Strategy aim of providing flexible and sustainable employment floorspace, and would encourage jobs and investment into the Borough and wider Gatwick Diamond. The above revisions would therefore assist in making the Policy, and Plan, reflective of business needs, flexible and therefore effective and consistent with national policy. The unnecessary restrictions would be removed. Reasons a) and b) as to “*unsoundness*” would therefore be addressed.

Further vehicular access from Balcombe Road (Policy HOR9) (pursuant to unsoundness reason c))

The draft Policy envisages one form of occupier car access to HBP, a new limb to J9a. An additional access is proposed from Balcombe Road to the east but the existing policy wording limits this to emergency vehicle and public transport use.

Highways England has identified for the site a requirement for a secondary access from Balcombe Road. Accordingly, in liaison with Highways England, Gatwick Airport, RBBC, the highways authority (Surrey County Council) and the adjacent highways authority (West Sussex County Council) discussions and micro simulation modelling work has taken place taking into account the provision of a secondary access (with appropriate physical restrictions to control its use).

While Surrey County Council and West Sussex County Council have produced traffic models which have been utilised in preparation of the draft Plan, it is noted that in both cases these models are of a strategic nature and neither analyses HBP’s proposals in detail. These representations do not seek to challenge the over-arching assumptions of these strategic models; however, they do provide evidence as to why, on a site specific basis, further traffic modelling work is required.

Accordingly, as indicated above, HBPD has commissioned its own transport evidence, in the form of site specific micro simulation modelling, from Vectos, which includes responses to the Surrey, West Sussex and Highways England models. Critically, this evidence provides its own detailed micro simulation of the local highway conditions pursuant to demonstrating the necessity and acceptability of a secondary access.

At **Appendix 2**, the Transport Evidence explains, reflects on and includes details about this micro-simulation traffic modelling and demonstrates that a secondary access can be provided without severe consequences to the local high network, this secondary access limited to a small percentage of registered business park users and subject to physical controls to avoid any abuse or create unauthorised access (or ‘rat-running’) directly through to Junction 9a. .

With reference to the evidence provided at **Appendix 2**, HBPD considers that the amendment to the policy wording, as set out in the **Annex**, will enable the Development Management Plan Policy HOR9 to provide for the effective, safe and required additional access to the site, which will address the “*unnecessarily restrictive*” and “*ineffective*” reason for “*unsoundness*” relating to highway access at set out at c) above.

Amendment to the protection of the “Gatwick Open Setting” (within Policy NHE1) (pursuant to unsoundness reason c))

The “Gatwick Open Setting” has its roots in the policy position pre-1974 when the location currently comprising Gatwick Airport was situated in Surrey. The location of the current airport was, at that time, situated within the Green Belt which consequently served to prevent coalescence between settlements.

Since the 1972 Local Government Act (and related Charlwood and Horley Act 1974) came into force, Gatwick Airport is now in West Sussex while Horley and other environs to the north of the airport remain in Surrey.

To prevent coalescence between the settlements and Gatwick Airport, in the absence of Green Belt Policy, the West Sussex Structure plan introduced a strategic gap between settlements adjacent to Gatwick Airport, and the Airport itself, where no development was assumed. The principle of this gap became enshrined in constituent LP planning policies, both in West Sussex and in Surrey.

In RBBC, the gap became reflected in policy protection known as the “Gatwick Airport Open Settling” (or “Gatwick Open Setting”). This policy currently relates to Horley in the Local Plan 2005 (Saved Policies) Policy Hr 37. It is noted that this policy was defined on the Proposals Map as including a significant majority of the site now proposed to be allocated.

Draft Policy NHE1 seeks to provide a “suitable buffer” to protect and reinforce the distinctiveness, and “separateness” of Horley from Crawley and “have regard” to the “open setting of the airport”. The draft policy explains that the notation of the “Gatwick Open Setting” is shown on the policies map. It should be noted that the policy seeks to preserve the open setting of the Airport “consistent with adopted planning policies in adjoining areas”.

While HBPD supports in principle the protection of a buffer to preserve the distinctiveness and separation of Horley from Gatwick, HBPD contends that the manner in which NHE1 (3) proposes to safeguard the buffer in relation to HOR9 is not effective. The policies map currently shows a linear buffer which would run along the southern edge of the proposed allocation under policy HOR9.

By locating the buffer in this location, this would severely constrain the developable area within HOR9 to 55% of its total area which would materially undermine the delivery of the employment allocation required to meet RBBC’s and the wider Gatwick Diamond identified need. Further, limiting the amount of developable land on this basis would undermine the benefits the allocation would bring in terms of national and Core Strategy policy. Figure 1, below, demonstrates the impact that such a buffer, positioned along the southern edge of the site, could have in terms of limiting the developable (for buildings), area:

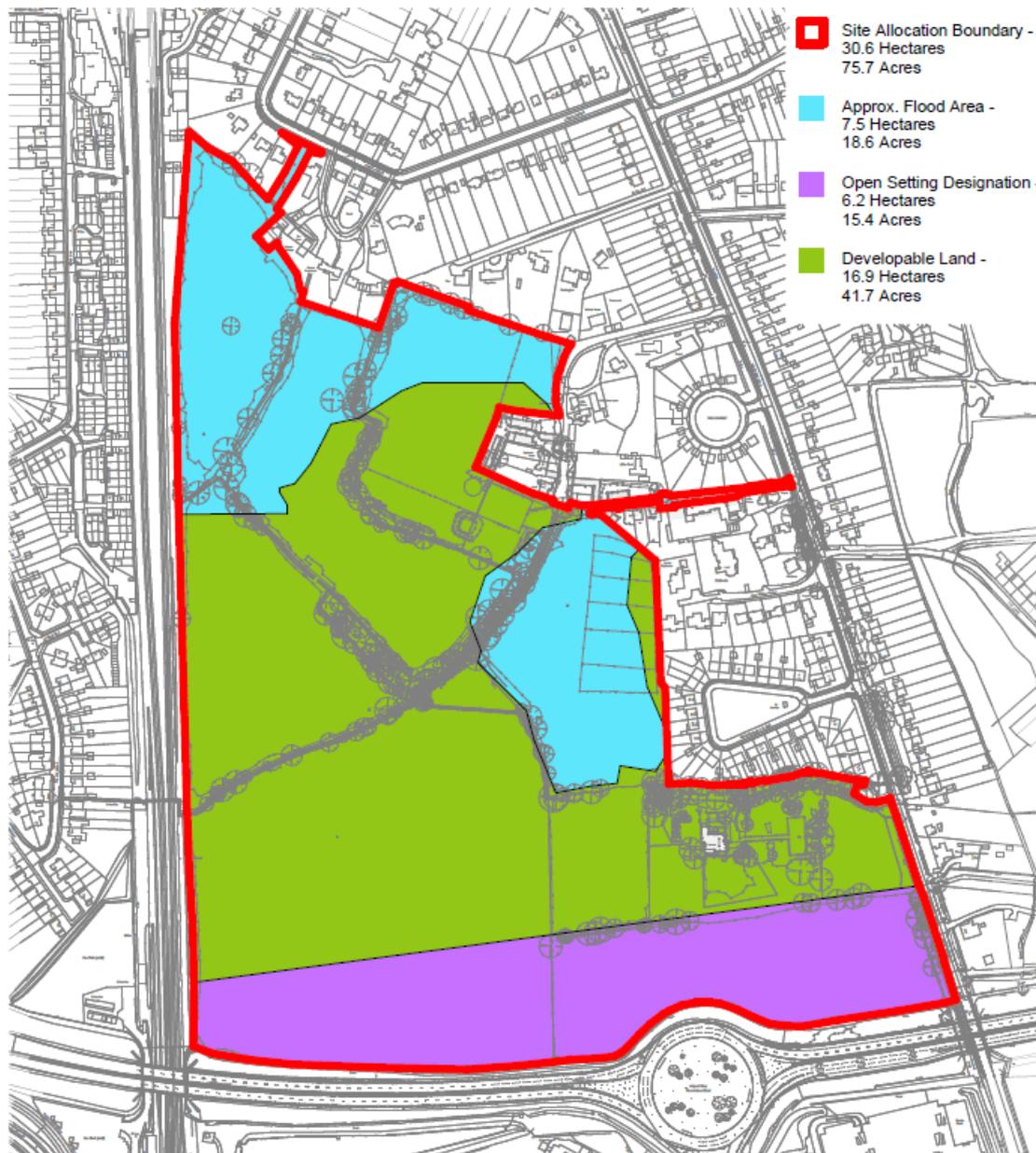


Figure 1: Effect on land Available for Built Development were a buffer to be provided along the southern side in accordance with Draft Policy NHE1 (as drafted)

Furthermore, locating the buffer in such a position would, in effect, result in the perverse position whereby employment uses are situated closer to adjacent residential dwellings to the north within Horley itself, while being buffered from the M23 spur (airport Way) to the south. In fact, the performance of a buffer to the south of the site would be further undermined by new limb from Junction 9a, proposed by virtue of the proposed allocation.

HBP notes that there is no Evidence Base produced by RBBC in support of this policy requirement. Given this, and the ineffective nature of the policy, it is considered that it would remain “*unsound*” unless, and until, revisions are made.

HBP contends that a more effective means of securing separation of Horley from Gatwick would be that, through the delivery of HOR9, that the landscaping buffer be situated as part of requisite public park and landscaping between the settlement of Horley and the business park. Such a buffer would assist in

preserving the residential amenity enjoyed by adjacent residents; serve to maintain the distinctiveness of Horley from Gatwick (and its associated commercial development – including Horley Business Park).

It is also noted that the policy makes oblique reference to related “*planning policies in adjacent areas.*” On behalf of HBP, an analysis has been undertaken of existing and emerging policies in the adjacent LPAs where these relate to the strategic gap. The results are set out in Table 1 below:

Table 1: Planning Policies relating to the Strategic Gap in adjacent LPAs

Adjacent LPA	“Strategic Gap” Policy
Mole Valley DC	None. Former Saved Policy RUD27 sought to prevent “ <i>Airport related development</i> ” but not saved on adoption of the Core Strategy in 2008.
Crawley BC	None. Crawley Local Plan Policy CH9 only seeks to prevent noise/visual intrusion in the “ <i>North East Crawley High Woodland Fringes</i> ”. Previously policy sought to protect the Strategic Gap. However this policy (in the former Core Strategy 2008) has now been deleted.
Horsham DC	Horsham District Planning Framework – Policy 27: General policy against settlement coalescence.

Accordingly, it should be noted that the strategic gap policy has become more nuanced in adjacent LPAs in the intervening years, or, as in the case of Mole Valley and Crawley, it has simply been deleted.

Given the policy has evolved to protect quality of landscape, rather than simply blanket separation, HBPD has commissioned the *Advice Note regarding Policy NHE1*, contained at **Appendix 3** that explains how an amended buffer, across HOR9, could work.

Accordingly, HBPD submits that the wording of both NHE1 and HOR9 should be amended on the basis as set out in the **Annex**. This would address the “*unnecessarily restrictive*” reason for “*unsoundness*” identified at c).

Additionally, the Policies Map, which shows a conflict between the buffer and the HOR9 allocation, should remove the notation of the buffer to the South of the site.

While HBPD contends that the above Policy continues to risk being found “*unsound*” owing to the lack of an evidence base i.e. “*unjustified*”), the above revision in relation to the treatment of HBP as proposed to be allocated under HOR9 at least seeks to make the Policy effective in terms of providing an appropriate buffer between Horley and the development to the south and ensuring that such a buffer performs an effective high-quality landscape function. It would also ensure that the most effective use of the available land is made to deliver against economic objectives.

Limit of Development in Flood Zone 2

In terms of development in areas susceptible to flooding, national policy within the NPPF (paragraph 100), states the following:

“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.”

As to the definition of *“inappropriate development”*, the related technical guidance, *“Flood Risk and Coastal Change”* (DCLG – 2014) states that (Table 2), the following uses are considered *“less vulnerable”* in terms of flood risk classification:

“Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution”

The Government’s *Flood Risk Assessments in Zones 2 and 3 (update February 2017)* confirms that restrictions on *“less vulnerable”* development (i.e. the *“exceptions test”*) do not apply for *“less vulnerable”* development in Flood Zone 2.

Notwithstanding this, HBPD wishes to present a positive strategy and design solution that avoids placing built development (i.e. buildings as opposed to access, parking and infrastructure) within Flood Zone 2. Given that it is the northern reaches of the site that are within Flood Zone 2, and the representations consider that the northern part of the site is the most appropriate for a landscape buffer, HBPD considers that policy amendments should reflect the degree of coterminosity between the two requirements. The amendment also makes explicit the fact that limited development where necessary, aside from built development (i.e. buildings) can be provided here.

Accordingly, the wording of HOR9 should be revised to read as set out in the **Annex** to clarify this matter and ensure consistency of approach.

Clarification regarding the delivery of the site (pursuant to unsoundness reason d))

HBPD supports the principle of a phased approach to development being secured by virtue of a masterplan, which, as the policy wording explains, should be a developer-produced document. HBPD considers that the wording could be strengthened pursuant to ensuring the site can be delivered comprehensively and as a single site through all parties working together.

HBPD has made the revisions to the policy wording for HOR9 as shown in the **Annex** to ensure that all parties work in co-operation in terms of the site delivery, making the application of the Policy clear and addressing *“unsoundness”* reason d).

Summary

In summary, HBPD supports the principle of the HOR9 allocation, as it would meet identified sub regional need and the needs with the Gatwick Diamond. It is located in a highly sustainable location close to Gatwick Airport and Horley and will provide significant local benefits.

However, it is our view that the draft Policies HOR9 and NHE1 are, as written, unsound as it these are based on insufficient evidence base, are unjustified, ineffective and is therefore not in accordance with the NPPF. HBPD considers that the representations made, the evidence produced, and the amendments made, will serve to make the policies, and hence the plan, sound.

These representations are submitted on behalf of HBPD. HBPD has a shared interest in ensuring that Horley Business Park can be delivered over the plan period. The representations made are intended to make Policy HOR9 (and NHE1 where it relates to HBP) as effective as possible, ensuring that sustainable employment development can be delivered and optimised in this location.

We trust that you are able to take these representation into account and that our suggested changes will be considered further.

We would welcome further opportunity to work with the Council and other relevant parties ahead of the Examination of the Local Plan in order to address the issues raised in both of our representations and reach an agreement on the wording of Policy HOR9 and related Policy NHE1.

HBPD hereby requests attendance at any forthcoming Examination in Public (EiP) by virtue of having made these representations.

Should you require any further information at this stage please do not hesitate make contact with Richard Robeson at this office.

Many thanks.

Yours faithfully,



Richard Robeson
Senior Planner

richard.robeson@glhearn.com

CC: Philip James – Reigate and Banstead BC

Annex – HBPD Revised Policy Wording

Revised Draft Policy HOR9 – Land West of Balcombe Road

The site is allocated for:

*A mix of business space for strategic employment purposes and suitable for a range of occupiers within Class B1 uses, **limited B8 and appropriate airport-related Sui Generis employment uses.***

*A complementary range of commercial, retail, leisure, **hotel and conferencing** facilities to serve and facilitate the main business use of the site*

At least 5 ha of new high quality public open space, including parkland and outdoor sports facilities

Requirements:

Development will be subject to the following requirements:

Movement and Accessibility:

- *Demonstrate through a Transport Assessment or Transport Statement that there will be no severe residual impact on the Local and Strategic road network, taking into account the impact of committed developments in the borough and surrounding areas including West Sussex and any viable mitigation;*
- *A new dedicated, direct access onto the strategic road network (M23 spur);*
- ***A secondary access from Balcombe road, to be limited to an agreed percentage of registered business car park users, public transport and emergency services;***
- *Measures and improvements to manage the impact of additional traffic on surrounding local roads;*
- *Provision of appropriate levels of on-site parking and a comprehensive travel plan;*
- *Improvements to public transport facilities – including existing bus infrastructure/passenger facilities and measures to maximise the accessibility of routes/services to future occupiers - in and around the site*
- *Upgrading and extension of pedestrian/cycle routes from the Business Park to Horley town centre and Gatwick Airport station;*

Drainage

- ***Layout to ensure no built development (i.e. excepting limited access, parking and infrastructure) on land within Flood Zone 2, incorporating appropriate mitigation measures into the landscape buffer and improvements to the ditch network within the site;***
- *Inclusion of flood mitigation and attenuation measures as appropriate. These measures should ensure no increase in the risk of flooding to the site and nearby properties and should seek opportunities to reduce both the cause and impact of existing flooding. Opportunities to reduce cause and impact of flooding should be explored;*
- *Measures to manage and reduce surface water run-off including a comprehensive system of SUDs;*

Design

- *Design and layout to achieve an appropriate transition to, and relationship with, neighbouring residential and countryside areas, including through appropriate height, massing and siting of buildings and suitable consideration of shared boundaries to include measures to reinforce existing tree and hedgerow screening;*
- ***Inclusion of an appropriate landscape buffer, and public open space, to the north and north east of the site, to reinforce the distinctive identity of Horley and its separation from Gatwick Airport (and Crawley) and the wider countryside setting to the east of the site;***
- *Buildings to be of an exemplar standard of design to reflect the strategic business park concept including sufficient flexibility and adaptability in building parameters and to provide adaptability to cater for a range of micro businesses, expanding and established businesses and major occupiers and to be complemented by high quality public realm;*

- Protection and enhancement of existing trees and hedgerows where possible and enhancement of green/blue infrastructure on site, and reflecting the River Mole Biodiversity Opportunity Area;
- Height and design of buildings, lighting and other design aspects to be consistent with the operational standards of Gatwick Airport and to respect aerodrome safeguarding requirements;
- As the site is within the 57dB LEQ airport noise contour, design must ensure an appropriate interior environment for users;
- Provide measures to minimise the impact of lighting upon neighbouring residential and adjoining countryside areas which are intrinsically dark to avoid light pollution to the night sky;
- Mitigate noise intrusion from activities on the site to adjacent residential and open areas.

Uses

- The predominant use of the site should be for B1a purposes with more limited B1b, B1c, **B8** and non B Class uses, **including appropriate airport related Sui Generis uses.**
- Complementary uses could include on-site catering, limited retail provision, **hotel and conferencing**, gym, crèche and medical services and similar provision but not at a scale likely to significantly divert trade from the wider area or to detract from the prime focus of the site as a Strategic Business Park.

Delivery

- Planning conditions and obligations to control delivery of the development, the use of the site and appropriate off-site considerations will be required, including for infrastructure, open space and social commitments. These will include:
- Requirement for ongoing economic impacts testing
- Use of local labour, local supply chain procurement and similar skills/capacity support (in conjunction with local education and training providers)
- Measures to encourage use of transport to provide non-car alternatives to facilitate accessibility not reliant on the use of private cars
- Provision and delivery of the public open space area

The development of the site will be in accordance with an agreed master **plan of the entire HOR9 allocation, produced by relevant parties in consultation with the Council**, requiring comprehensive development in line with the above requirements. The master plan will be submitted to assist the consideration of subsequent planning application (s) and must include details on phasing, programming of infrastructure and details on quantum of development and appropriate uses.

To assist with the proper planning and on-going functioning of the site Supplementary Planning Guidance will be provided.

Revised Draft Policy NHE1 – Landscape Protection

The following spatial designations are relevant:

- *The Surrey Hills Area of Outstanding Natural Beauty (AONB)*
- *The Area of Great Landscape Value (AGLV)*

1) Within or adjacent to the Surrey Hills Area of Outstanding Natural Beauty, great weight will be attached to the impact that the proposal would have on the landscape and scenic beauty. The same principles will apply to proposals within the current Area of Great Landscape Value and maintained as such, until such a time as the AONB Boundary Review is completed which may extend the AONB onto current AGLV.

*2) Proposals for development between Horley and Gatwick Airport must ensure that a physical visual break is retained through the protection and intensification of existing tree/hedgerow belts and other landscape measures including introducing a suitable and distinct landscape buffer to reinforce the identity and separateness of the settlement of Horley from Crawley and the airport, and have regard to **and be** consistent with adopted planning policies in adjoining areas. This is reflected on the policies map with the notation of 'Gatwick Open Setting', **aside from within allocated sites therein, which shall contain their own requirements to provide an appropriate buffer to prevent such coalescence.***

3) Throughout the borough, development proposals must:

- a) Respect the landscape character and landscape features of the locality*
- b) Have particular regard for potential impacts on ridgelines, public views and tranquillity, and the effects of light pollution*
- c) Be of a design, siting and scale that is complementary to the landscape and surroundings*
- d) Use appropriate external building materials, particularly in terms of type and colour, to avoid the development appearing conspicuous in the landscape.*
- e) Demonstrate how opportunities have been taken to enhance the immediate and wider setting of the development*
- f) Seek to protect the best and most versatile agricultural land.*

4) Development that would assist in the continuation or establishment of rural businesses or benefit the social and economic wellbeing of rural communities will be supported (subject to adherence with other policies) providing it does not conflict with the aims of conserving and enhancing the natural beauty of the landscape.

5) Proposals for renewable energy developments, in particular wind turbines and solar farms, will only be permitted where their impact (visual and noise) would not harm the landscape or undermine the intrinsic character and beauty of the countryside.