
Representation to Reigate and Banstead Development Management Plan Regulation 19 Consultation

Land at Sandcross Lane, South Park, Reigate

Prepared for:

Miller Homes and Thakeham Homes

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1. Introduction

- 1.1. This representation is submitted on behalf of Miller Homes and Thakeham Homes to the Reigate and Banstead Borough Council (“RBBC”) Development Management Plan (“DMP”) Regulation 19 Consultation in respect of land at Sandcross Lane, South Park, Reigate (“the site”). This follows a representation submitted in October 2016 to the Regulation 18 stage of the DMP. A full list of representations made is included in **Appendix 1**.
- 1.2. This representation supports the allocation of the site as a Sustainable Urban Extension and its removal from the Green Belt within Policy SSW2 of the DMP and as shown on the Central Area Policies Map.
- 1.3. However there are a number of points which were previously highlighted in the representation to the Regulation 18 DMP consultation which have not been addressed by the RBBC in the current consultation document. These points include, inter alia:
- The principal concern for Miller and Thakeham is that although RBBC has included the site as a Sustainable Urban Extension, it is a reserve site, not to be delivered immediately;
 - The drafting of Policy MLS1 which relies on the publication of Annual Monitoring Reports in triggering the release of Sustainable Urban Extensions when a lack of five year supply is reported. This is ambiguous, not positively prepared, unlikely to be effective and does not provide sufficient certainty for developers;
 - The site’s capacity is between 300 – 350 units, but the DMP only proposes 260 homes in Policy SSW2; and
 - The site illustrated in Policy SSW2 and on the Central Area Policies Map does not reflect the complete parcel of land which is available for allocation.
- 1.4. This representation seeks to amend policy MLS1 which imposes a phasing restriction on the release of Sustainable Urban Extensions (SUEs). This requires the sequential release of such sites upon RBBC identifying a shortfall in the five year supply (plus a margin of 5%). It is our view that the phasing element of Policy MLS1 should be removed to ensure the DMP is positively prepared. Alternatively should this element remain each site should have a clear timeline for its delivery to ensure a rolling five year housing land supply is maintained.
- 1.5. Miller Homes and Thakeham Homes are ready to progress an outline planning application for the site, subject to constructive pre-application discussions with RBBC. The site can therefore deliver homes quickly and bolster the housing land supply early in the plan period.
- 1.6. RBBCs DMP Regulation 19 Viability Report suggests that the site will not be viable if 35% of all homes on site were affordable (excluding retirement accommodation). Miller Homes and Thakeham Homes disagree with this position, and confirm that the site has the potential to deliver up to 35% affordable new homes.

- 1.7. The site remains a **suitable candidate for immediate allocation** on the basis that:
- It is available for development;
 - Its location to existing transport networks, facilities and services is highly sustainable;
 - The site is not subject to constraints which cannot be overcome;
 - The site makes a limited contribution to the five purposes of the Green Belt; and
 - The site will make a meaningful contribution towards the Borough's housing land supply
- 1.8. This representation also comments on the proposed planning policies in the DMP which would be relevant to the implementation of the development site.
- 1.9. In summary, this representation:
- Supports the principle of allocating the site for housing and its removal from the Green Belt;
 - Questions if the plan can be considered to be positively prepared without either the early release of the SUEs or a clear timetable for their phased release;
 - Comments and raises a technical objection that the location plan for Policy SSW2 is not consistent with the plan appended to previous representations shown at **Appendix 2**;
 - Raises minor objections to several of the development management policies which can be easily addressed; and
 - Illustrates that the site capacity within the DMP is well below the capacity determined as part of the masterplanning process and therefore raises objection to the capacity assessment as it fails to make the most efficient use of the land.
- 1.10. This representation should be read in conjunction with:
- Site location plan **Appendix 2**
 - Indicative Masterplan prepared by Savills Urban Design Studio (September 2016) **Appendix 3**
 - Land budget prepared by Savills Urban Design Studio (September 2016) **Appendix 4**
 - Local Facilities **Appendix 5**
 - Transport Note prepared by i-Transport (September 2018) **Appendix 6**

2. Site and Surroundings

- 2.1. Land at Sandcross Lane comprises an area of 16.4 hectares (ha) and is located to the south west of Reigate, immediately adjacent to the settlement's boundary. The site consists predominately of open agricultural land, divided into large fields bounded by hedgerows and tree belts. A scout hut is located in the north eastern corner of the site. The site is currently designated as Metropolitan Green Belt and is within Flood Zone 1 (the lowest risk of fluvial flooding).
- 2.2. The site is largely defined by the surrounding road network which runs parallel to its eastern, southern and western boundaries. To the north of the site is Sandcross School (a small state-run primary school). Reigate Garden Centre is located on the eastern boundary of the site, and a YMCA centre is located on the south east boundary of the site. The site generally slopes from north to south and has no significant landscape or ecology features.
- 2.3. Owing to the site's position immediately adjacent to the settlement boundary, the site is located in close proximity to a number of local facilities. Of note is Sandcross Primary School, Reigate Secondary School, local shops, and recreational open space at King George's Field. A location Plan is included within **Appendix 2**.
- 2.4. There are three bus stops within close proximity to the site, located on Sandcross Lane. These offer services to Merstham, South Park, Woodhatch, East Surrey Hospital, Reigate and Redhill. Reigate and Earlswood Railway Stations are both accessible by bus.

3. Housing Trajectory over the Plan Period

Housing policies

- 3.1. The RBBC Core Strategy (adopted 2014) plans for the delivery of at least 6,900 homes over the plan period 2012 – 2027, equating to an annual average provision of 460 dwellings per year. Of these, at least 5,800 dwellings will be delivered within urban areas, with a particular emphasis on ‘priority areas’ identified within Policy CS6.
- 3.2. The Council has also made provision for ‘Sustainable Urban Extensions’, based on a future assessment of the potential with identified areas of search. These sites include areas of land in the Green Belt. These are (in order of priority):
- Countryside beyond the Green Belt adjoining the urban area of Horley;
 - East of Redhill and East of Merstham;
 - South and South West of Reigate.
- 3.3. The adopted housing target, however, remains a minimum. The Inspector’s Report into the Examination of the Core Strategy, published in January 2014, found that the *“full objectively assessed need for housing over the plan period is an annual average of between about 600 and 640 dwellings, giving a total of 9,000 – 9,600 dwellings over the plan period”* and further made the point that *“there is potential for up to 7,400 dwellings to be delivered over the plan period (5,800 from the urban areas, up to 200 from around Horley and up to 1,400 from two Green Belt Sustainable Urban Extensions)”*.
- 3.4. Crucially, the Inspector noted that *“even delivery of the higher figure of 7,400 dwellings would be some 1,600-2,200 dwellings short of fully meeting the borough’s objectively assessed housing needs”*.
- 3.5. RBBC has planned for the delivery of 6,900 dwellings; 500 fewer than the 7,400 dwellings the Inspector considered possible. This remains fewer still than RBBC’s full objectively assessed need for 9,600 dwellings. RBBC is therefore an ‘exporting authority’ with respect to housing needs. To meet the objectives of the NPPF, RBBC should be making every effort to ensure that the Local Plan is meeting the full, objectively assessed needs for both market and affordable housing within its housing market area. This will require positive planning that ensure at the very least the annualised housing target can be met over the life of the plan.

Housing Trajectory

- 3.6. The DMP includes a Housing Trajectory (Annex 7) which outlines where housing will come from over the life of the plan. This is reflective of the Housing Trajectory included within **Appendix 2** of the Core Strategy (adopted in 2014).

- 3.7. Both housing trajectories include an allowance for windfall delivery over the life of the plan. This is standard practice and can be included where compelling evidence exists that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. The Core Strategy upon its adoption in 2014 allowed for 50 units per year, over a 14 year period (2013/14 - 2026/27), amounting to 700 units. The DMP has again made provision for 700 units, but over an 8 year period (2019/20 – 2026/27), equating to 75 units per year (other than for 25 units in the 2018/19 monitoring period). This amendment to the housing trajectory places a significant reliance on the delivery of units via windfall sites. It would instead be a more positive strategy to utilise known SUEs to provide this supply. This would result in a more consistent supply of housing over the plan period by ensuring a rolling supply of deliverable sites, and therefore reduce the risk of RBBC not meeting the needs of the local community.
- 3.8. The revised housing trajectory in the DMP includes a projection of the minimum housing target for the Borough. The trajectory indicates that year on year the projected supply will be around the level of this target of 460 dwellings per annum. The housing trajectory does not indicate any aspiration by RBBC to exceed this minimum in any way. As set out in the Inspectors Report into the Core Strategy, the housing target for RBBC does not meet their full need and therefore the Council should be striving to deliver as much sustainable housing development as possible, rather than only meeting the minimum requirement. The allocation of sufficient sites to be delivered in the early stages of the plan period, will ensure that the minimum requirement is delivered and exceeded and protect the housing supply against non-implementation of sites. The amendment of RBBC's policies to reflect a more positive plan making stance and the need to significantly boost housing supply as advocated by the NPPF should be seriously considered by the Council.

Other Sustainable Urban Extensions

- 3.9. The total number of Sustainable Urban Extensions (SUEs) currently totals 1,005 units, however the DMP trajectory currently accounts for 724 units¹.
- 3.10. Policy MLS1 has identified an order for the release of all 11 SUEs. These are as follows:
- SEH4 – Land off The Close and Haroldsea Drive, Horley (40 units)
 - NWH2 – Land at Bonehurst Road, Horley (40 units)
 - NWH1 – Land at Meath Green Lane (75 units)
 - ERM1 – Land at Hillsbrow, Redhill (100 units)
 - SSW6 – Land West of Castle Drive (10 units)
 - SSW7 – Hartswood Nursery, Reigate (25 units)
 - ERM5 – Oakley Farm, Merstham (95 units)
 - ERM4 – Land South of Bletchingley Road (50 units)
 - **SSW2 – Land at Sandcross Lane, South Park, Reigate (260 units)**
 - SSW9 – Dovers Farm, Woodhatch, Reigate (100 units)

¹ This is the product of 245 (Area 2a), 295 (Area 2b), and 184 (Area 3).

- ERM2/3 – Land West of Copyhold Works and Former Copyhold Works (210 units)
- 3.11. Land at Sandcross Lane is the largest of all Sustainable Urban Extension sites and is eighth in the order of release in accordance with Policy MLS1. At present, eight other sites, totalling 435 units, will be required to come forward before it can be “released”.
- 3.12. Unlike other identified sites, Land at Sandcross Lane is not reliant upon other sites being delivered and is controlled by Miller Homes and Thakeham Homes who have a good track record of delivering high quality, sustainable development.
- 3.13. It is onerous for the site to wait for the sequential release of other sites before it too can be developed, especially considering that there is no guarantee others are deliverable. Should RBBC in the future be unable to demonstrate a 5 Year Housing Land Supply, deliverable sites will be required to supplement the housing supply. The process of monitoring and release, as set out further below is unlikely to address any shortfall in the required timeframe. It is therefore in the interests of RBBC to prioritise the delivery of Land at Sandcross Lane which is available and deliverable now.

Monitoring of Housing Supply

- 3.14. The DMP states that SUEs will be released upon an identified shortfall in the Council’s Five Year Housing Land Supply. This will be determined through the Council’s Annual Monitoring Reports to address a shortfall plus a margin of 5% (as required by the NPPF).
- 3.15. The Council determining its own supply shortfall is a somewhat subjective exercise and is not a constructive test to ensure that required units of housing will be released. This also relies upon RBBC remaining up-to-date with their annual monitoring processes. It is also a reactionary approach rather than a proactive drive to facilitate the delivery of housing. This can be aided by allocating sites for immediate release or by specifying the latest point in the plan period that the sites will be released. This gives certainty to developers, allowing preparatory work and processes to commence until delivery.
- 3.16. Whilst it is our view the phasing element of Policy MLS1 should be removed, if it considered acceptable, it is vital that the DMP includes a policy for each site, as well as a timeline detailing when sites will be released. If the mechanism for the release of sites is reactionary at a stage at which RBBC is unable to demonstrate a five year housing land supply, delivery will not be immediate as it will be necessary to work up a planning application (12 – 18 months), obtain planning consent (further 3 – 6 months) and implement the consent (6 – 12 months). This is likely to delay delivery of any units by at least 2-3 years, whilst there still being a housing shortfall. There needs to be some certainty from the DMP when the sites will come forward so that all parties can prepare to implement the allocations accordingly. Without further clarity on the timescale for release of sites the DMP cannot be considered to reflect the presumption in favour of sustainable development or core principles of the NPPF include the need to plan positively and proactively and boost the supply of housing.
- 3.17. To summarise the comments made on Policy MLS1, Thakeham and Miller support the principle of

Sustainable Urban Extensions but object to phasing element of this policy as this is not positively prepared or in line with the NPPF. This element of the policy should be removed.

- 3.18. Notwithstanding the above, if RBBC consider that the phasing of sites must remain, this should be amended to:
- Remove priority list
 - Provide a policy for each site with a clear timeline for release

Delivery timeframes

- 3.19. On the basis of the above, and in the interests of positive planning, the Land at Sandcross Lane should be considered for immediate release on adoption of the DMP. By releasing the site immediately, the following indicative timetable for delivery would be achievable:
- Site release – 2018/19
 - Planning application progressed (Outline, then Detailed Reserved Matters) – 2019-2021
 - Pre-Commencement Conditions – 2021
 - Commencement on site – 2021/22
 - Delivery of Housing – 2021 to 2023
- 3.20. This would ensure that any failure to meet their housing target, as projected in 2021/22 by the RBBC trajectory (Annex 7 of the DMP), can be addressed through the delivery of Land at Sandcross Lane.

4. Proposed Allocation of Land at Sandcross Lane

- 4.1. The site has been previously submitted to the Strategic Housing Land Availability Assessment (SHLAA), and more recently to the Housing and Economic Land Availability Assessment (HELAA) under references SPW04 and SPW13.

2016

- SPW04 (SHLAA) - Land at Sandcross Lane, Reigate - potential capacity: 220 units Potentially suitable, available and achievable
- SPW13 (SHLAA) - 145 Sandcross Lane - potential capacity: 50 units Potentially suitable, available and achievable

2017

- SPW04 (HELAA) – Land at Sandcross Lane, Reigate – potential capacity: 300 units Suitable, available and achievable
- SPW13 (HELAA) – 145 Sandcross Lane – Potential capacity: 30 units Suitable, available and achievable

- 4.2. Thakeham in their response to the 2017 HELAA confirmed site SPW13 had capacity for 50 units, as set out in 2016 SHLAA.

- 4.3. It should be noted that in both the previous SHLAA and the up-to-date HELAA, the Council have identified no overbearing constraints and the sites have been allocated as one potential site under reference SSW2.

- 4.4. The Regulation 19 DMP envisages the site as a Sustainable Urban Extension and allocates the site for:

- Approximately 260 new homes;
- 65 units of retirement accommodation for older people;
- Small-scale local commercial facilities, including shops, to complement existing nearby facilities;
- Land set aside for a new health facility, close to existing community facilities;
- New high quality public open space in the western part of the site.

- 4.5. The inclusion of this site within the emerging DMP is supported strongly. The site is clearly the most appropriate option south west of Reigate, as demonstrated by the available evidence. This site is in a highly sustainable location, has a limited contribution to the purposes of the Green Belt and is suitable for residential development. As such, there are strong reasons in favour of the site allocation.

- 4.6. An Indicative Masterplan, Land Budget and Local Facilities Plans prepared by Savills Urban Design Studio were submitted to the Council as part of a representation to the Regulation 18 consultation into the DMP. This has been included in **Appendix 3, 4 and 5**. The purpose of the Masterplan was to demonstrate that the aspirations of both Miller and Thakeham align with the objectives of the Council, which is to deliver a

sustainable development, meeting the housing needs of the Borough and to support growth. The Indicative layout also shows that it will be possible to deliver more homes on the site, whilst still providing the necessary infrastructure as identified by the Council in the emerging DMP.

Miller Homes and Thakeham Homes Proposal

- 4.7. Miller and Thakeham propose the following for the site:
- Approximately 300-350 homes, including market and affordable tenures, an element of which will be specialist housing for the elderly (circa 65 dwellings);
 - Publicly accessible open space;
 - New multifunctional meeting space to replace Scout Hut facility (space to be offered to relocate the local scout group);
 - Local commercial / retail subject to market demand; and
 - Land for an on-site health facility (subject to consultation with the Clinical Commissioning Group).
- 4.8. Due to the proximity of Sandcross Primary School, there remains an opportunity to relieve pressure on space for educational provision by considering adjustments to the layout of the school or minor expansion, if necessary.
- 4.9. The Scout Hut located in the north eastern part of the site is on a short term lease and so there is an opportunity to provide an improved replacement facility / multifunctional meeting space in an alternative location on the site. Additionally, the replacement facility can be offered to the group on terms that provide the group with longer term certainty.
- 4.10. The site adjoins the settlement to the north east and south. This presents the opportunity for the proposals to deliver a connected and integrated development and to sensitively address the relationship with the open countryside beyond with the existing settlement and to limit any visual impact.
- 4.11. The parcel available for development and which should be included in Policy SSW2 can be found at **Appendix 2**. The proposals map currently does not include this area of land which has been previously submitted by Miller and Thakeham. The area of land excluded is that which currently contains the scout hut which as set out above forms part of the proposals at this site. The area shown in **Appendix 2** must therefore be added to the proposals map and Policy SSW2.

Draft Policy Framework

- 4.12. Miller and Thakeham remain committed to developing the site in accordance with the requirements set out on page 122 of the Regulation 19 DMP. This is illustrated in the enclosed Masterplan and in Table 1 below.

Table 1: Conformity with the requirements for the site in the emerging DMP

	Proposed by Miller and Thakeham?	
	Yes	No
Deliver biodiversity and green infrastructure enhancements.	✓	
Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new public open space in the west of the site.	✓	
A site specific flood risk assessment must be undertaken which takes account of the Strategic Flood Risk Assessment Level 2.	✓	
Protection of existing trees and hedgerows	✓	
Incorporate a buffer zone to the existing ditch network within the site to safeguard ecology and water quality	✓	
Additional tree or hedgerow planting along the northern boundary to strengthen the green belt boundary	✓	
A serviced site capable of accommodating a new health facility	✓	
Enhancements to local community provision	✓	
Consideration to opportunities to improve traffic management and access to Sandcross Primary School.	✓	
Local improvements to existing bus infrastructure/ passenger facilities in and around Sandcross Lane and measures to maximise the accessibility of routes/ services to new and existing residents.	✓	
Improvements to the local highway network, including the Dovers Green Road/ Sandcross Lane junction and Slipshatch Road/ Sandcross Lane junction	✓	
Measures to manage the effects on nearby rural and residential roads from rat-running and re-routing	✓	
Submission of a Transport Assessment as part of a planning application, to include consideration of impacts on the junction of Woodhatch Road/A217 Dovers Green Road/Prices Road. Where necessary to contribute to any improvements and interventions required, with respect to the impact of additional traffic on safety, capacity and efficiency of this junction.	✓	
New high quality public open space in the western part of the site	✓	

Quantum of Development

- 4.13. The Council's concept masterplan within the Regulation 18 DMP included the following development assumptions:
- A total developable area of 8.6 ha/ 50% developable area.
 - Provides a range of 172-344 dwellings, but states an overall capacity for 260 dwellings.
- 4.14. Miller and Thakeham benefit from information obtained from a number of site assessments, including ecology and tree surveys. It is considered that the Council's concept masterplan is conservative and does not plan to make the most efficient use of the land, of which 9.95ha is developable and able to deliver up to 350 units. This includes all the requirements of the emerging policy approach to the site, including 5.4 ha of public open space, biodiversity enhancements and densities to respect the transition of the development into the countryside. The maximum density included in the indicative masterplan is 35 dwellings per ha. This density is based on the Council's preference for smaller family housing and retirement accommodation.
- 4.15. The Council's concept masterplan also appeared to incorporate a surplus of open space compared to the current Local Plan standard, equating to 1.8 ha of open space over and above the standard. This is the equivalent of around 63 dwellings at 35 dwellings per ha. It is recognised that a bespoke level of open space outside of the standards could be incorporated into the site, but the amount within the Council's concept masterplan had been considered to be unnecessarily excessive. This failed to appreciate the large areas of retained countryside beyond the site, within the remaining Green Belt alongside nearby formal playing areas, such as King George's fields.
- 4.16. The following observations were made on the Council's concept masterplan:
- **Connectivity:** Possibility for access from each bounding road; Sandcross Lane and Slipshatch Road to the east and south respectively. Provides direct routes to nearby schools and shops. Northern access point poorly located to feed directly into the site; this could be improved by moving it further south (in the location of the scout hut) enabling a clear path further into the site itself. Boundaries need careful consideration in respect of the retention of trees and hedgerows, and how connections and their type (ranging from vehicular to foot) can be best located to have the least impact.
 - **Coverage, Variety and Uses:** The Concept masterplan is partially drawn over third party land and conflicts with the retention of hedgerows and copses, with development zones unlikely to be set back to an appropriate degree. Location of mixed use area is hidden from and set back from existing surrounding roads. Health, shops and facilities will benefit from being located together, and would benefit from being located close to facilities on Slipshatch Road.

- Biodiversity and Open Space: Open space is overprovided whilst a green network approach has not been fully realised. Green spaces would be better rationalised around existing hedgerows, tree belts and field drains, enabling stronger opportunities for retention and enhancement. Notably, the copse on Sandcross Lane appears to overlap development zones; should trees and habitats be significant here, this could form part of a green network linking across the site to Wither Wood, ancient woodland, to the south west. Provision is far in excess of recognised open space standards and the community is unlikely to significantly benefit from overprovision, as there are already a number of parks, play and sports facilities in close vicinity.

Transport Impacts

- 4.17. This representation is supported a Technical Note prepared by I-transport (see **Appendix 6**). The document considers this impact of development the site for circa 350 dwellings; this includes an overview of likely access arrangements and transport impact. The evidence suggests that the site is capable of accommodating the proposed quantum of development proposed by Miller Homes and Thakeham Homes with negligible difference between the delivery of 260 dwellings (as per the draft DMP) and the proposed 350 dwellings.
- 4.18. The assessment concludes that the development would satisfy the three key tests set out in paragraph 32 of the NPPF and there are no highway or transport reasons against allocated the site for 350 dwellings.

Housing for Older People

- 4.19. There is no in principle objection to including “sheltered/ retirement accommodation” within the site. However given the site is currently proposed as a Sustainable Urban Extension and the timeframe for delivering the site is not yet known there must be appropriate flexibility so that the needs of the local community at the time of release can be incorporated. The type of accommodation to be provided must reflect the current market conditions at the time when the site comes forward.
- 4.20. It is also not clear from the Council’s “Housing for Older People” in the evidence base, how it has come to the view that it is appropriate to require 25% of all units to be retirement accommodation on SUE sites of over 100 units.
- 4.21. We therefore propose the following wording:

“Land at Sandcross Lane, Reigate is allocated for the development of approximately 300-350 new homes (C2/C3 uses) to include at least 65 units developed specifically for older people (50 years and over) unless it can be demonstrated that it would be unviable to do so or there is an insufficient local need. The exact mix of housing including that for older people should reflect current need at the point of release of the site.”

Health Facility, Commercial Space and Multifunctional Community Space

- 4.22. The requirement for land to be made available for a health facility on the site is supported so long as there is a demand for such a facility by the Clinical Commission Group (CCP) at the time the site comes forward. Discussions with the CCP will be advanced in the event RBBC proposes to allocate the site. The policy related to the allocation of this site must be flexible and enable the development to take account of the demand for facilities as and when the site comes forward.
- 4.23. In relation to the commercial space to be included within the development, there is concern that new commercial space may undermine the existing retail premises in the immediately surrounding area, such as the nearby Co-op, Premier Express and local centre at Prices Lane. The requirements should be reviewed to ensure vitality for both existing and proposed shops and facilities, particularly as a number of local facilities can be found within 800m. The provision of new commercial space could have a negative impact on the vitality and economic vitality of the existing local centre. Miller and Thakeham wish to explore this option further, but have concerns about any specific policy requirement, particularly its compliance with Core Strategy Policy CS7: Town and Local Centres.
- 4.24. Miller and Thakeham have also identified an opportunity to provide land for a new multifunctional community space, which would replace and improve the existing Scout Hall facility on the site. It is envisaged that this new building could be provided within a “hub” with a health facility and near to the existing shops located along Slipshatch Road.
- 4.25. On the basis of the above, the following wording is proposed as part of the draft policy for the site:

“The development will include land for a healthcare facility the type and size of which will be informed by the current need in the local area when the site is released for development, unless it can be demonstrated that there is insufficient demand for the facility.”

Development Viability

- 4.26. The proposed development will provide 35% on site affordable housing. The RBBC DMP Regulation 19 Viability Report suggests that the development would not be viable at 35% affordable housing. Miller Homes and Thakeham Homes starting point is that the development will be viable and will comply with the affordable housing requirements and so challenges RBBC’s findings in this respect. This is even true of the current proposed allocation (260 units), but an allocation at the appropriate capacity of 350 units would provide further resilience to the schemes viability, whilst delivering a greater number (circa 30 more) of affordable units.
- 4.27. Draft Policy DES6 Affordable Housing, should contain further flexibility, to ensure that in the event that development costs increase due to unforeseen circumstances or sale values decrease affordable housing provision does not cause site to become unviable. There must remain the option for the level of onsite affordable housing to be determined by an open book viability assessment at the planning application stage.

5. Comments on Proposed DMP Policies

- 5.1. In principle, this representation supports the objectives which have been set out in the consultation document and which seek to manage the design and detail of new developments. However, in the interests of ensuring that the Sustainable Urban Extension can be delivered as effectively and efficiently as possible, a number of observations are made. These centre on the prescriptive nature of some of the draft policies, see Table 2.

Table 2: Proposed Policies of the DMP

Proposed Policy	Comments
MLS1: Phasing of Urban Extensions	<p>Minor Technical Objection</p> <p>The Policy is not positively prepared in that it fails to provide the necessary certainty that the site will be released for development in the plan period. The reliance on Annual Monitoring Reports does not provide an appropriate forum to enable RBBC to collaborate with those able to deliver housing. There is a concern that it will restrict housing delivery.</p>
SSW2: Land at Sandcross Lane, South Park, Reigate	<p>Comment/ suggestion</p> <p>The site location plan for the Policy omits land as proposed by Miller and Thakeham for allocation. Policy SSW2 also includes land outside the promoters' control incorporating Council land currently used as skate park adjacent to the YMCA. The site location plan should be amended accordingly. See Appendix 2.</p> <p>In addition, SSW2 should include the land of the Scout Hut at Sandcross Lane. The proposal would include the replacement of the building for the scout group elsewhere on site providing the group with improved facilities with longer term certainty. The indicative masterplan at Appendix 3 illustrates that the Scout Hut land is required for one of the principal accesses to the site.</p> <p>The Site Location Plan for SSW2 should be as per PA 001 Rev A dated Sept 2016 (See Appendix 2).</p> <p><u>Suggested alterations to Policy:</u></p> <p>The Policy should state that the site is removed from the Green Belt in accordance with the Central Area Policies Map.</p> <p>Source should refer to HELAA references: SPW 04 & SPW 13</p>



	<p>Residential: Should be approximately 350 units including 65 units of retirement accommodation for older people (subject to viability and market requirements).</p> <p>Commercial/retail: Small scale local commercial facilities, including shops to complement existing nearby facilities, subject to commercial appetite for such use on site.</p> <p><u>Design approach and mitigation requirements</u></p> <p>Protection of existing tree and hedgerows, where possible and subject to appropriate mitigation.</p>
<p>DES5 High Quality New Homes</p>	<p>Comment</p> <p>This representation supports the objective for securing high quality homes. However, some of the requirements of the Policy are unduly prescriptive. For instance:</p> <p>Part 4) refers to “accommodation providing a convenient and efficient layout, including sufficient circulation space and avoiding awkwardly or impractically shaped rooms.” This is not specific and could lead to interpretation issues, leading to an inefficient planning process. Furthermore, the planning system is unable to control the internal layout of buildings, particularly because interior alterations do not fall within the definition of development at Section 55(2) of the TCP Act 1990. It should be left to the market as to how the layout of homes is designed.</p> <p>Part 5) refers to the requirement for sufficient space for storage and drying clothes. As above, this is not specific and is unnecessary.</p>
<p>DES7 Specialist Housing</p>	<p>Comment / minor technical objection</p> <p>Part d) i. requires specialist accommodation which falls into C3 use class (e.g. retirement accommodation) to provide affordable housing.</p> <p>It is well documented in planning appeal cases that the co-existence by elderly people under differing housing tenure (some subsidised, most not) in the same apartment building and no doubt sharing most, if not all, of the same facilities, gives rise to distinct problems. Such arrangement may lead to a divisive community, fostering resentment, and could pose significant management issues for the social provider involved, which are difficult to control and resolve. As such it is not always practical to accommodate affordable housing on site, for these types of developments, particularly given the relatively modest quantum of the retirement accommodation indicated for SSW2.</p> <p>It is suggested that the policy is amended to include the following:</p>

	<p><i>All such developments that fall within Use Class C3, should comply with DES6 (Affordable Housing). Where it can be demonstrated that it would not be possible to provide affordable accommodation on site, developers will be required to pay a financial contribution of equivalent value towards the provision of affordable housing.</i></p>
CCF1 Climate Change	<p>Comment</p> <p>The requirements of Policy CCF1 are already covered by the relevant building regulations and so this policy is not required.</p>
GTT1: Gypsy, Traveller and Showpeople Accommodation	<p>Comment/ minor technical objection</p> <p>Policy GTT1 Gypsy, Traveller and Travelling Showperson Accommodation allocates up to 8 pitches and 5 plots on specific sites.</p> <p>In the supporting text for the policy there is an additional table that sets aside pitch numbers at potential future urban extensions to “accommodate future need”.</p> <p>It says that the land for the Gypsies and Travellers should be on site ‘unless the developer can demonstrate circumstances which demonstrate that provision on an alternative suitable site is identified, and is made available and deliverable by the applicant’. In the supporting text of Policy GTT1, it says that the number of pitches achievable at SSW2 achievable is 3.</p> <p>The Gypsy and Traveller Accommodation Assessment July 2017 concludes there is a need for 28 pitches for travellers up to 2027.</p> <p>There does not appear to be any evidence to support the allocation for “future need” beyond the plan period on urban extensions. The allocation of gypsy pitches must be based on evidence and informed by the Gypsy and Traveller community, who have specific needs and requirements particularly in terms of location. We are also not aware of any interest expressed for pitch provision at the site by the Gypsy and Traveller community.</p> <p>The Gypsy and Traveller Accommodation Assessment 2017 states that the Council considers that a proposed rate of 1 pitch per 70 homes on urban extension sites would present a viable rate of delivery (which is based on a rate to represent a cost equivalent to approximately 2% of total development costs). This requires justification, and further information should be provided for review prior to Examination.</p> <p>As drafted the supporting text of the policy is not justified by appropriate evidence.</p>
ORS2 Open Space	<p>Comment</p>



	<p>Part 1) of the policy includes detailed criteria for open space to be delivered by development of different size. This does not however allow for any flexibility to consider the open space provision on a case by case basis. For example, at Sandcross Lane if this criteria were to be followed and 1 LAP, 1 LEAP and 1 MUGA be provided on site, this would potentially conflict with existing recreational space provided by the skate park.</p> <p>Part 2) of the Policy should be clarified to include circumstance whereby there is surplus provision in the local area, or where an off-site contribution to existing facilities would be more appropriate than on site provision.</p>
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6. Conclusion

- 6.1. Land at Sandcross Lane to the south west of Reigate is deliverable and appropriate for release from the Green Belt. It will contribute positively to meeting the housing needs of the area as it is in a sustainable location, being close to existing services and facilities. A range of transport options would also be available to future residents of the development.
- 6.2. The emerging DMP prepared by RBBC is, in general, welcomed by Miller Homes and Thakeham Homes as a means of setting out the Council's approach to housing delivery, to meet the needs of the Borough over the plan period. However, the phasing element of Policy MSL1 is at odds with the Government's emphasis on the presumption for sustainable development and delivering it quickly where the positives of development clearly outweigh the negatives.
- 6.3. There is a concern that the Council's approach will fail to achieve the necessary delivery of housing that is required to meet the needs of the Borough to maintain a rolling five year supply of housing and support the delivery of development throughout the plan period. The proposal that Sustainable Urban Extensions are to be released only if supported by data contained within Annual Monitoring Reports is considered to be unnecessarily complicated, reactive and would prevent RBBC (and developers) acting swiftly in addressing housing needs through the plan period. Equally, it fails to take account of the amount of time and resources required to deliver housing.
- 6.4. Should RBBC not consider immediate delivery of the Sustainable Urban Extension sites acceptable, a more efficient approach than currently proposed would be to set out a timetable/ trigger date for release of each of the appropriate sites. Annual Monitoring Reports may still be used to monitor supply and trigger release, but each site should be given a stop date, by which the site should be released. This would therefore ensure that there is a continual supply of deliverable sites coming forward and provide enough certainty to the developers/ landowners on which to make financial commitments to deliver the development.
- 6.5. Draft Policy SSW2 significantly underestimates the quantum of development that could be achieved on site. As such, Miller Homes and Thakeham Homes have prepared an indicative masterplan to demonstrate that additional housing can be provided, whilst respecting the character of the area and delivering the on-site infrastructure envisaged by the DMP, such as land for a health facility and open space. On this basis, the site could deliver between 300 – 350 dwellings.
- 6.6. A Transport Note has also been appended to this document, to demonstrate that work has already been undertaken to establish the impact of the development of the site on the surrounding highway network. It concludes that a development of up to 350 dwellings would not have a severe impact on the highway network, subject to off-site mitigation as set out in the Note.



Appendices



Appendix 1.0 Summary of Representations

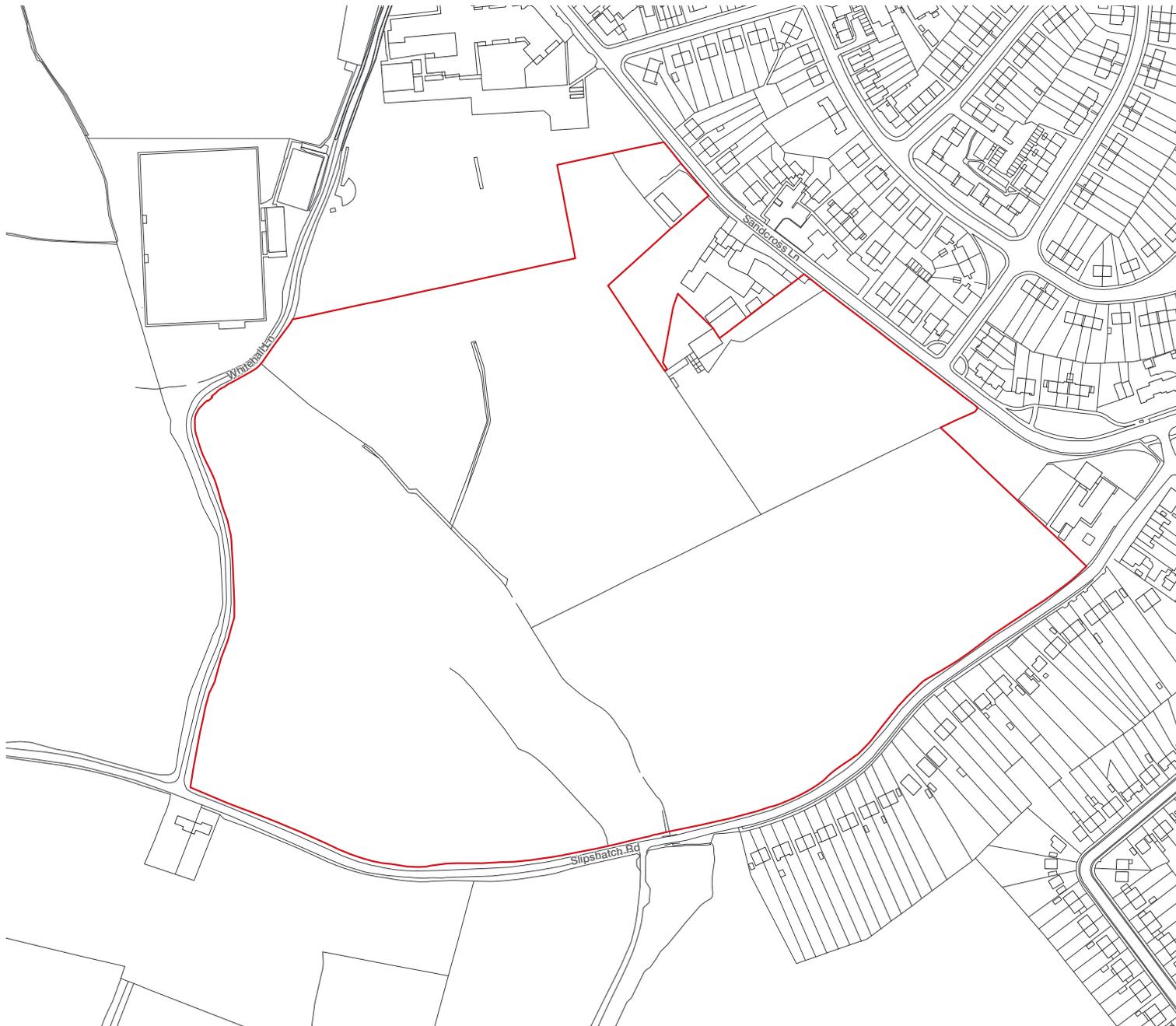


Submission s
Representation on RBBC Core Strategy Examination (2013)
Representation to CIL Examination (2015)
Representation to RBBC SHLAA (2016)
Representation to RBBC DMP Regulation 18 consultation (October 2016)
Representation to RBBC HELAA (2017)



Appendix 2.0 Location Plan





- Site Boundary
- 🕒 1:2500 @ A3

title Site

project Sandcross Lane, Reigate
client Miller Homes & Thakeham
job no SNPL 250333
drawing no PA001
revision A
date 16 Sept 2016
drawn by NH
checked by PF

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Appendix 3.0 Masterplan

Masterplan



- Site Boundary
- 1 Health Centre & Multi-purpose Hall
Possible community health centre and new multi-purpose hall, accessed from Slipshatch Road adjacent to the local shops and the youth centre. Hall to include accommodation to replace scout hut. Site to provide parking subject to requirements. Further possibility to integrate a shop and other services here.
- 2 New Park
High quality park set between tree belts and field drain on the southwest corner. Possibility to integrate further drainage features and (semi) natural spaces.
- 3 Sandcross Lane Copse
Natural space for the enjoyment of the existing and future community. Selective retention of trees, protected by TPO, to improve health and biodiversity.
- 4 Field Drains & Tree Belts
Retained and enhanced field drains, as part of a sustainable drainage strategy. Retaining prominent tree belts as part of a green network across the site; enhancing biodiversity and informal green spaces for community enjoyment.
- 5 Slipshatch Road Copse
Retained tree belt with significant new planting in close relationship to Withy Wood, (ancient woodland) to the south. Provides a link between the woodland and the community green network, both for biodiversity enhancement and recreational enjoyment.
- 6 Rural Edge
New community frontage looking outwards across Whitehall Lane. Set back behind the retained hedgerow and trees. No direct vehicular access.
- 7 Slipshatch Road Edge
Retained tree and hedgerow on Slipshatch Road, setting back new homes from the existing properties.

🕒 1:2500 @ A3

title **Masterplan**

Illustrative

project Sandcross Lane, Reigate

client Miller Homes & Thakeham

job no SNPL 250333

drawing no MP001

revision F (21 Feb 2018)

date 10 Oct 2016

drawn by NH

checked by PF

a Possible Vehicular Access

b Key Pedestrian & Cycle Access

urban design studio

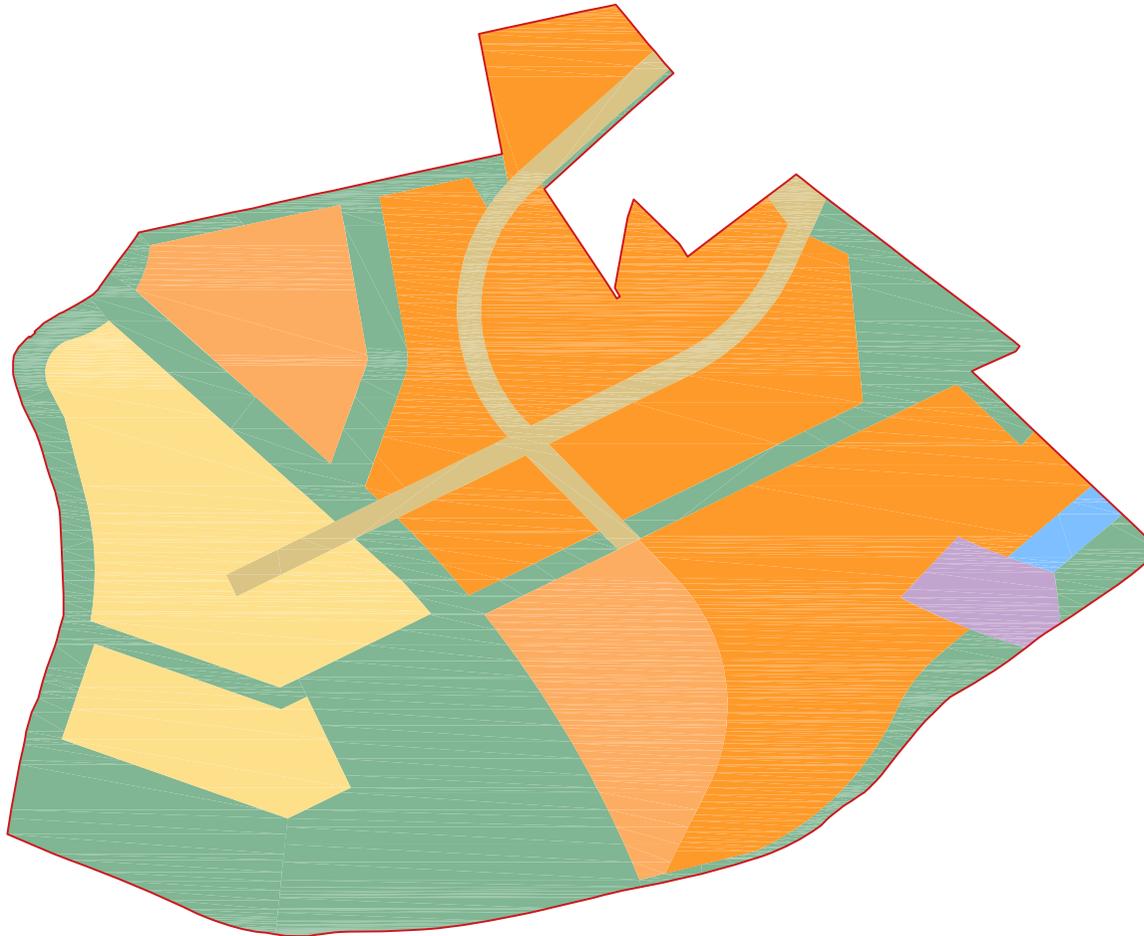


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Appendix 4.0 Land Budget

Land Budget



○ Site Boundary	16.40ha
● Infrastructure	0.80ha
● Green	5.34ha
● Health Centre	0.25ha
● Multi-Purpose Hall	0.10ha
● Residential (High Density)	5.61ha
● Residential (Medium Density)	1.96ha
● Residential (Low Density)	2.34ha
Developable Area	9.91ha
New Homes*	250-350du

*Based on developable area with a density range between 25-35du/ha

🕒 1:2500 @ A3

title **Land Budget**

Indicative

project Sandcross Lane, Reigate

client Miller Homes & Thakeham

job no SNPL 250333

drawing no LB001

revision C

date 29 Sept 2016

drawn by NH

checked by PF

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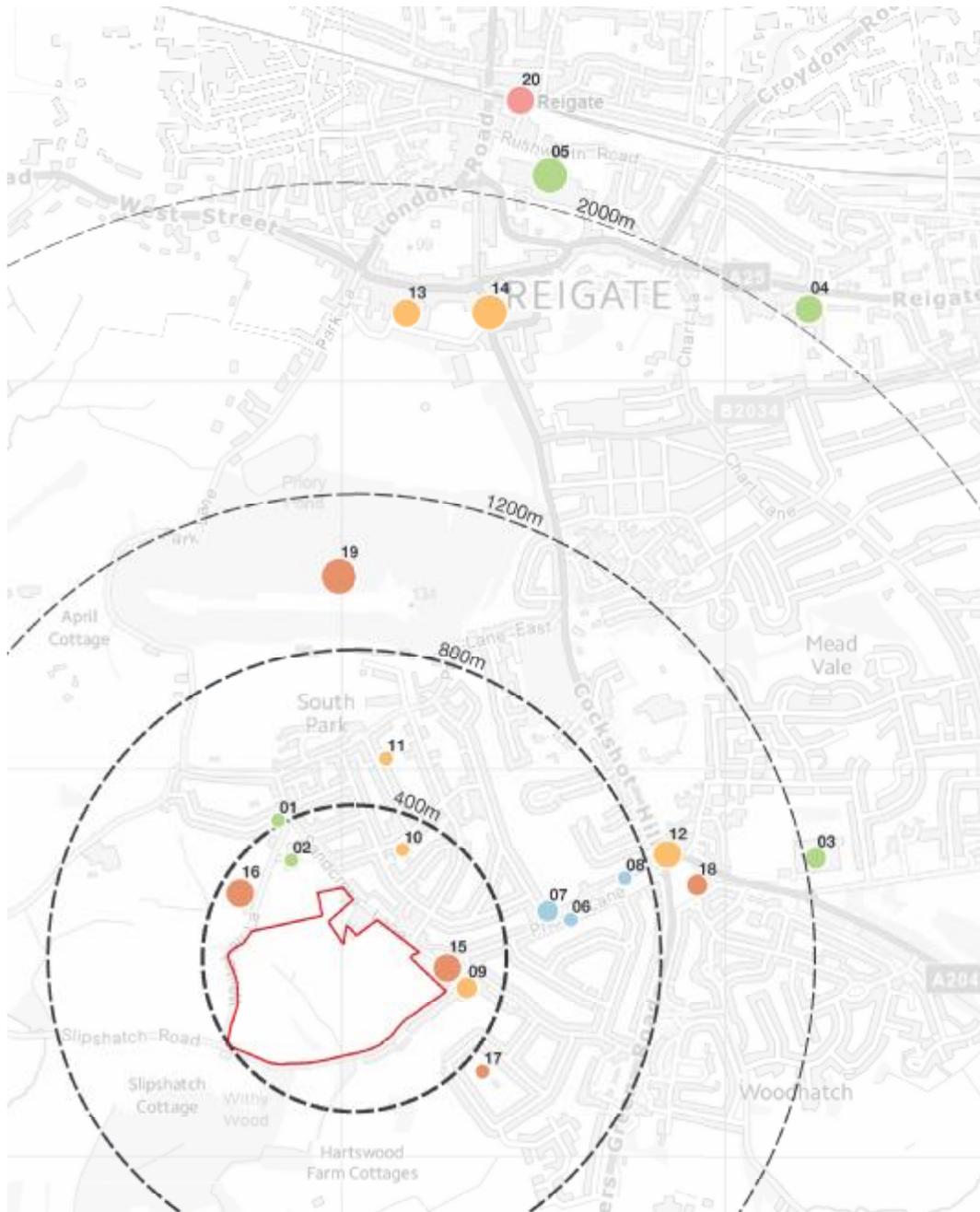
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Appendix 5.0 Local Facilities

Local Facilities



Education

● 01	Nursery Daisy Chain Nursery	619m	● 04	Grammar School Reigate Grammar School	2977m
● 02	Primary School Sandcross School	519m	● 05	College Reigate College	2760m
● 03	Secondary School Reigate School	1490m			

Health

● 06	Dental Practice Hartwood Dental Practice	722m	● 07	Health Centre South Park Surgery	704m
● 08	Pharmacy Townsend Chemist	940m			

Retail & Entertainment

● 09	Local Shops Grocery Store & Specialist Retail	400m	● 12	Neighbourhood Centre Grocery Stores, Specialist Retail, Food & Pub	976m
● 10	Grocery Store Grocery Store	567m	● 13	Supermarket Morrisons	2550m
● 11	Pub Pub	711m	● 14	Town Centre Shops, Food & Entertainment	2460m

Play, Parks & Recreation

● 15	Skate & BMX Park Sandcross Skate & BMX Park	256m	● 19	Historic Park Reigate & Priory Park	1098m
● 16	Sports & Recreation Ground King George's Field	321m			
● 17	Play Area Hartwood Avenue Play Area	840m			
● 18	Park Woodhatch Park	770m			

Transport

● 20	Railway Station Reigate Station	3360m			
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*Identified travel distance is an approximate measure from the centre of the site using the present road network. This is apart from the shown radial distances, centred on the site, that do not relate to the existing network.

© 1:12000 @ A3

title Local Facilities

project Sandcross Lane, Reigate
 client Miller Homes & Thakeham
 job no SNPL 250333
 drawing no CA001
 revision D
 date 07 Oct 2016
 drawn by NH
 checked by PF

urban design studio

savills.com/urbandesign



Appendix 6.0 Transport Note (February 2018)

Charles Collins MRTPI
Director

Robert Steele MRTPI
Associate