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7th October 2016

Head of Planning Policy
Reigate & Banstead Borough Council
Town Hall, Castlefield Road
Reigate,
Surrey
RH2 0SH

Dear Sirs,

Reigate and Banstead Development Management Plan Regulation 18 Consultation Representations on behalf of Taylor Wimpey UK Ltd

Introduction

We refer to the above consultation Document and write on behalf of our client's, Taylor Wimpey UK Ltd., setting out a number of comments upon certain of the issues and options contained therein.

Our representations relate to the following key policies:

- Policy PS3 (Pg103): Allocation of Sites for Development
- Policy ERM5 (Pg147): Oakley Farm, Bletchingley Road, Merstham
- Policy MLS1 (Pg191): Phasing of Urban Extension Sites

Plans and particulars are enclosed in support of our representations as follows:

- i. Duly completed Response Form
- ii. Indicative Masterplan No. CS1/2371/105
- iii. Landscape Overview Report (October 2016)
- iv. Access Strategy Review Technical Note (October 2016)

Taylor Wimpey UK Ltd has a controlling interest in the Oakley Farm site, proposed to be allocated for housing development under Policy ERM5 and our representations are set out in the context of supporting the merits of the site for development.

Policy PS3: Allocate Sites for Development Consistent with the Core Strategy

Adopted Core Strategy (July 2014)

The Core Strategy was adopted in July 2014 and sets out a requirement for the delivery of at least 6,900 dwellings during the period 2012 to 2027, equivalent to 460dpa.

Section 6.2 identifies the strategic locations for growth as well as the allocation of development. Paragraph 6.2.8 identifies three broad areas of search for sustainable urban extensions which includes (b) the area to the East of Redhill and East of Merstham, with potential for up to 500-700 new homes.

Paragraph 6.2.9 adds that the DMP and Policies Map will allocate sites for development within these areas of search and that further work and testing will be undertaken, to include a detailed Green Belt boundary review and assessment of sustainability.

Sustainable Urban Extensions Technical Report

The broad areas of search, including the development opportunity to the east of Merstham, were identified in the Council's Paper "Sustainable Urban Extensions: Broad Geographic Locations Technical Report" (Nov 2012) which formed part of the evidence base to the Core Strategy.

Table 13 on Pg26 of the technical report states in relation to the suitability of providing for housing development as part of a Green Belt Review to the east of Merstham as follows:

"Highest priority for allocation and release as and when required given fit with overall spatial strategy as well as most limited contribution to strategic Green Belt functions."

Paragraph 5.8 concludes:

"Within the Green Belt, the most sustainable and appropriate broad location for development adjoining the urban area is to the East of Redhill and East of Merstham. The DMP should identify sites within this broad location to deliver around 500 to 700 new homes: these sites should be released for development if monitoring information indicates that opportunities within the urban area are insufficient to deliver the Council's housing target."

A detailed assessment of the suitability of land east of Merstham for development (Area of Search K) is set out on pages 79-83 of the Technical Report and which appraisal in relation to strategic Green Belt considerations states:

"The countryside within the search area is largely disturbed and disjointed and this has implications for openness. The part of the search area north of the M25 has a greater degree of openness and there is intervisibility and long range views across the wider countryside. There is a reasonable degree of development and built land in the southern part of the search area which has

implications from a Green Belt perspective. The Green Belt in the area has low or no sensitivity with regards to strategic or local gaps, and only the northern part has limited sensitivity from a historic setting perspective.

Additional technical work, including the Council's Landscape and Townscape Character Assessment, identifies that this area has a low sensitivity to change. As such, development of the ERM5 site can be developed in a manner that would integrate well with the adjoining settlement to the west and would not intrude on the wider landscape setting to the south, or north within the Surrey Hills AONB.

Summary

On the basis of the foregoing, the principle of providing for an urban extension to the east of Merstham has been established through preparation of the Core Strategy and the allocation of land at Oakley Farm, through Policy ERM5 would be entirely consistent with the approach set out in Core Strategy Policy CS8.

Policy ERM5: Oakley Farm, off Bletchingley Road, Merstham

The Draft Policy Approach

In the green box titled "what does the evidence base say about the site" reference is made to the positive assessment of the site in the Council's Sustainable Urban Extensions Technical Report (see above) and its positive assessment in the Council's Green Belt Review, with the site scoring a low overall priority for protection, ranked 5 (with 5 being the lowest and 1 being the highest).

It is further added that the site has strong boundaries and that development would be contained thus reducing urban sprawl. As to the quantum of development, reference is made to a total developable area of 3.7ha and the provision of between 74 to 148 dwellings.

In the subsequent purple box on Pg148 titled "what could development on this site comprise?" refers to approximately 95 dwellings and an element of commercial floorspace and/or community space.

Policy Response

General

We have appraised the suitability of the site for development and previously submitted information to the Council to inform their evidence base as part of the plan making process and we remain of the view that it would be appropriate to develop the site for up to 145 dwellings.

As a result, we are of the view that there is an opportunity to increase the dwelling numbers from this site which would make more effective use of removing the land from the Green Belt.

The accompanying plans and particulars that have been prepared in support of the proposed allocation of the site for housing are summarised below.

The Landscape Overview finds that an appropriately designed development would integrate well with the existing settlement edge to the west and would not intrude on the wider landscape setting to the south, or north within the Surrey Hills AONB. It also concludes that the development of the site would not be intrusive on key views in the wider area.

In relation to Green Belt considerations, the Overview finds that the site could be released from the Green Belt without harming the objectives of the NPPF's Green Belt Policy.

The Masterplan has been informed by a thorough technical appraisal of the **characteristics of the site and surrounding area**. It provides for approximately 145 dwellings on circa 4.33ha at a net density of approximately 33dph. The remainder of site, extending to circa 3.88ha can provide accessible and landscaped open space as well as a buffer to the M23 to the north. Access is proposed from Bletchingley Road, with a potential pedestrian/cycle/emergency access from Bolsover Grove to the west.

The proposed development parcels allow for the retention of a number of trees and wooded areas in order to provide for a development in a sylvan setting. It is considered that this approach helps to sensitively assimilate the proposed residential development into the site.

The Masterplan also allows for a potential orchard area to the front of the locally listed buildings at Oakley Farm. Research of historical mapping showed the presence of a former orchard in this location and this provides a means of respecting the setting of the locally listed buildings. However, and as set out below, they may afford the potential for conversion to housing, small scale employment and/or community use.

Indicative Concept Masterplan

The scheme provides for circa 145 dwellings (at approximately 33dph (net)), associated public open space, landscaping, pedestrian and cycle links together with a means of access from Bletchingley Road. As drafted, the Masterplan shows the retention of the existing farm buildings (located in the south west corner of the site) within a landscaped setting. However, they may afford the potential for conversion to housing, small scale employment and/or community use and we welcome the opportunity to explore this with the LPA in relation to the details of the proposed site allocation.

In terms of the overall quantum of development, the scheme can provide for a range of dwelling types and tenures in order to meet identified housing needs, including affordable housing.

The Indicative Masterplan demonstrates how the mature landscape features can be retained, thus maintaining the generally wooded character of the Site.

New housing would be located within the existing landscape framework which would provide a high level of containment in views from the surrounding area.

The key masterplan principles may be summarised as relating to the following:

- Development of up to 145 dwellings to be predominately 2 storey in height
- Vehicular access to be from Bletchingley Road with potential pedestrian/secondary access/emergency links to Bolsover Grove

- Retain and manage existing mature hedgerows and trees within open space and green corridors
- Retain the existing public footpath connection through the Site
- Respect the setting of the locally listed buildings; and
- Respect the amenity of adjoining residential dwellings

We welcome the opportunity to discuss the form and content of the Masterplan with the LPA as part of the ongoing preparation of the development Management Plan.

Landscape Overview

The Landscape Overview has assessed the suitability of the site to accommodate a development of approximately 145 dwellings having regard to landscape capacity considerations.

The assessment culminates in the appraisal set out in section 5 of the Report which includes an appraisal of the acceptability of developing the site for housing in relation to the following considerations:

1. landscape character and quality,
2. public rights of way,
3. visual impact,
4. impact on heritage assets; and
5. suitability for release from the Metropolitan Green Belt.

The Overview concludes as follows:

- The Site lies at the existing urban fringe and is well related to the housing area to the west. It benefits from a mature landscape framework which provides a high degree of containment in views from the surrounding area.
- Reigate and Banstead Borough Council have commissioned a Landscape and Townscape Assessment of the Borough as part of the supporting information for the Development Plan. This identifies the Site as within area B3, which comprises the land alongside the eastern edge of Redhill and Merstham. This assessment describes this area as a disturbed fringe landscape that in general has a low sensitivity to change.
- The Indicative Masterplan would integrate well with the adjoining settlement of Merstham to the west and would not intrude on the wider landscape setting to the south, or north within the Surrey Hills AONB. In addition, housing in this location would not be intrusive on key views from the surrounding area.
- The Site could be released from the Green Belt without harming the objectives of the Green Belt Policy as set out in the NPPF.

In conclusion, removal of the Site from the Green Belt would not prejudice the five functions of Green Belts as set in the NPPF."

Access Strategy Review

The Technical Note identifies that the site benefits from good connections to Merstham with good pedestrian and cycle links, being located 1.8km from Merstham railway station or approximately 20 minutes' walk.

Merstham station provides up to 3 trains an hour to London Bridge as well as frequent services to Gatwick Airport, Horsham, Reigate and Crawley.

Bus services 430 and 435 currently serve Bletchingley Road and Malmston Avenue, providing circular services between Merstham and Redhill, East Surrey Hospital and Reigate, which run approximately every 15 minutes. Bus stops are currently request stops located on lamp posts and could benefit from improvements, such as bus shelter provision.

The circular bus service links the site to local facilities within Merstham, such a food stores, library, doctor's surgery and recreational centre, as well as a range of facilities available in Redhill.

The local road network provides adequate provision for cyclists, particularly the less trafficked routes such as Radstock Way and Malmston Avenue. These routes provide links to the railway station and local facilities, with the train station being some 5 minutes from the site by bike.

In addition to the above, there are good quality, lit pedestrian footways through the estate to the west of the site, linking to the site via Bolsover Grove

As to accessing the site, it is proposed to provide a priority T junction access for the site onto Bletchingley Road. This is shown in Drawing 14-032/01. The proposed access will be 5.5m in width and provide 2m footways into the site. A realignment of the existing Bletchingley Road, within the highway boundary, is proposed to allow the introduction of a new 2m footway to the north of Bletchingley Road, joining to the existing footways to the west of the site. This will significantly improve pedestrian access and safety along Bletchingley Road and allow safe access to the existing bus stops.

A speed survey has been undertaken on Bletchingley Road in order to understand existing traffic speeds and ensure adequate visibility can be achieved from the site access.

Adequate visibility can be achieved within the site ownership and highway boundary, without the requirement for any third party land.

To conclude, the site location is such that journeys by sustainable modes would be an attractive option to residents of a development at the site travelling to local facilities, or by public transport to other destinations for employment or leisure opportunities. Furthermore, there are not considered to be any capacity or access constraints on the local highway network.

It is therefore concluded that the site presents as wholly suitable for residential development from a transportation perspective.

Green Belt

Having regard to the Green Belt tests set out in the NPPF (Para 80 refers), development of the site for housing would be acceptable having regard to the five Green Belt purposes as follows:

- It would not result in unrestricted sprawl of large built-up areas;
- It would not lead to coalescence;
- It would prevent more peripheral countryside locations from encroachment; and could strengthen the Green Belt boundary
- There is no "special" character to be preserved; and
- It would provide for a mix of deliverable homes, including helping to meet the need to supply family sized dwellings to meet identified needs to complement higher density schemes for flatted forms of development on previously developed land within urban locations.

Summary

On the basis of the foregoing, we are of the view, as identified on Pg147 of the consultation document, that the site has the capacity to accommodate up to 145 dwellings as part of an overall layout that would make the most efficient use of the site whilst also respecting the urban edge location and the setting of the wider countryside beyond.

A summary of the merits of the site as a location to provide for a housing allocation following a review of the Green Belt is summarised as follows:

- The site extends to approximately 8.21ha and could provide for approximately 145 dwellings on circa 4.33ha, to include a mix of dwelling types and sizes including affordable housing.
- The site is in a sustainable location within accessible distance to local schools, shops and services and well as public transport facilities including Merstham train station.
- The site could be accessed from Bletchingley Road, with a separate pedestrian/cycle emergency access link from Bolsover Grove.
- Footpaths and bus stops in the vicinity of the site can be upgraded, thus providing for sustainable linkages/connections.
- The development areas for housing are located within flood zone 1.
- The site affords a logical "rounding-off" opportunity to the east of Merstham.
- It is well contained from the wider countryside beyond. As set out in the accompanying Landscape Overview, development of the site can help to strengthen the Green Belt boundary by means of a landscape buffer to the north and east.
- Development can be assimilated into the character of the area through a sensitive layout and form of development, to include a mix of dwellings types and tenures and storey heights.

- There are no known technical or environmental constraints to bringing the site forward for development.
- The form and layout of development as shown on the indicative master plan respects the setting of designated heritage assets.
- The form, scale and juxtaposition of the dwellings within the site respects the topography of the site and surrounding area and can be assimilated into the character of the area.
- The indicative masterplan ensures a sufficient set-back distance from the M23, in the form of a landscaped buffer, to provide for an appropriate residential environment.

The 12 no. bullet points summarise the acceptability of the development of the site for housing, including in relation to the LPA's earlier concerns as set out at paragraph 1.5 above.

Policy MLS1: Phasing of urban Extension Sites

Policy Response

We support the general approach to the prioritisation of the urban extension allocations as set out in the first bullet point on Pg191 of the Consultation Document, but suggest that particular weighting should be given the suitability merits of the sites and their ranking in relation to the Green Belt. Sites ranked 5 should have priority in terms of their release/allocation over and above those ranked 1.

As to the overarching principle of only releasing the Green Belt sites on the basis of a lack of five year supply, we are of the view that the Oakley Farm site should be allocated as part of the current supply is so far as it is deliverable and can come forward in helping to meet the need for housing in the current five year period.

The Council's 5yr HLS Position as at 31 March 2016 suggests a surplus of 480 dwelling in meeting the 2,398 dwelling requirement for the period 2016 to 2021. However, the components of supply include the delivery of 654 dwellings from North West Horley (Table B refers) and 406 dwellings on sites without planning permission (Table D refers). Any delay in bringing these sites forward could result in a deficit in the five year position. Moreover, identifying the Oakley Farm site as part of the baseline supply will assist in satisfying the objective of boosting the supply of housing land as set out at paragraph 47 of the NPPF.

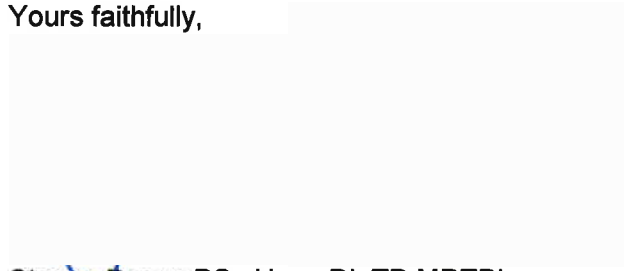
Summary

Against the above background, including on the basis of the Council's technical work underpinning the adopted Core Strategy, there are no known constraints to bringing the ERM5 (Oakley Farm) site forward as a housing allocation such through preparation of the Development Management DPD.

We trust the above comments are of assistance in producing a revised version of the Local Plan for a subsequent Regulation 19 consultation and await confirmation of receipt of our representations in due course. In addition, we welcome the opportunity to meet with you in order to discuss the suitability of the site as a housing allocation and the overall masterplan approach to be adopted, including in relation to the detailed policy wording.

Please do not hesitate to contact the writer should you wish to discuss any matter(s) arising.

Yours faithfully,



Steven Brown BSc Hons DipTP MRTPI

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