



THE SUBMISSION FROM BURGH HEATH  
RESIDENTS' ASSOCIATION

TO THE

REIGATE AND BANSTEAD

DRAFT DEVELOPMENT MANAGEMENT PLAN  
REGULATION 19

**18 February 2018**

This submission has been prepared for Burgh Heath Residents' Association by the Burgh Heath Development Group(BHDG) which is constituted as follows:

[redacted]  
[redacted]  
[redacted] member of the BHRA committee

[redacted]  
[redacted] - member of the BHRA committee

[redacted]  
[redacted] - Chair BHDG

[redacted]  
[redacted] - member of the BHRA committee

It has held one meeting and several online discussions. This latest representation takes into account views expressed by the local residents' association committee and its street representatives.

## **INTRODUCTORY COMMENTS**

Burgh Heath Village is a community of 850 people and 450 households. It is located 1.5 miles south of Banstead our Local Town Centre and is one of its satellite communities. It is part of Kingswood and Burgh Heath(KBH), a socially inhomogeneous ward. BHDG made a detailed set of 45 responses to Regulation 18 of the DMP consultation. We were very pleased that 12 of these received positive responses that appear to have resulted in changes to the DMP. There are however five matters that remain contentious and are the subject of this document. Appendix 1 provides a summary of the agreed and contentious topics. **Our final comments are shown in bold type.**

### **CONTENTION 1**

Previously EMP8: Secure local skills and training opportunities, responded as follows:

*This policy is problematic.*

*In sub section (a): The opportunities for training must be continuous so that they are sustainable beyond the end of the particular development project. How long are the apprenticeships and at what level, would they be accredited?*

*In sub section (b): training opportunities are provided for employment at the conclusion of a development project. It appears that the developer of, say a factory, would have an obligation to assure the training local people who would be employed in the factory. Once built, the developer would no longer be involved; it would be the occupying business that had the training responsibility. Who would the responsibility rest with, the developer or user? How would this to be managed, would this mean that the Borough had a responsibility for the provision of training? Greater clarity is needed here.*

**This is now referred to as EMP 5**

**We believe that the Borough's response remains ill considered, illogical and muddled. Surely the purpose of building both houses and commercial premises is to provide for people and businesses in the longer term. Providing training for the construction industry is essentially meeting a transient need and is not necessarily a sustainable activity.**

**What is needed is to reinforce the long term human infrastructure by meeting the needs of the occupants of the new premises and houses. Of course it might be difficult, a priori, to know the nature of the businesses that will occupy the new premises, so auditing training needs must be a continuous and on-going activity, carried out by local FE providers. The constructors of houses and premises could be bound to contribute to enhance training through an extra component of the Community Infrastructure Levy which could then be directed to local FE providers.**

## **CONTENTION 2**

Previously DES5: Housing Mix, we responded as follows:

*There are substantial problems here. The extracts from the NPPF refer to "wider opportunities for home ownership(sic)" and in the same sentence the words sustainable, inclusive and mixed are used.*

*This fails to recognize that there are substantial parts of the borough community that simply cannot afford to buy houses here. Many of these people have roles that are necessary to the sustainability of the community. Even the term "affordable" (for purchase) is inappropriately defined and would not meet the housing needs of the lower paid. Reference must be made explicitly to the need for rented housing not just privately let but municipal housing perhaps by trusts. Only by these means could sustainability and inclusivity be truly achieved.*

*In terms of mix and inclusivity this too needs clearer definition. These are terms that are key to achieving social mixing. To have developments with pockets of different types of housing will not achieve these aims. The policy must refer to mechanisms that achieve these aims, it is not sufficient to simply specify fractions or proportions of housing types. All of this requires very careful consideration that is not manifest here.*

*We believe that this section is weak. It must address the needs of people who are important to the community who could only afford to rent or to buy low cost good quality homes. This has important implications in dealing with builders, the borough has important obligations to its community and should impose stringent requirements on developers to ensure that suitable housing is delivered.*

### **This is now designated as DES4 with relevant material at DES6 - Affordable Housing**

**In both sections the words "social housing" are studiously avoided. The consequence is that "affordable" is used in a nuanced way, we can only speculate whether this was purposeful. The distinction is very important, formally they are defined differently. 50% and 80% of market rent respectively.**

**In this relatively prosperous borough housing is expensive and property with rents at the 80% level will exclude many, not just the young, but those on low salaries on whom the community depends. This is obvious stuff but there is no clear concession to the latter, in a real sense this is not a sustainable housing policy.**

**Achieving the mix requires careful management but unless this mix has a significant and explicitly defined rented social element it will not meet the community's needs.**

### CONTENTION 3

OSR3: Outdoor sport and recreation – we responded as follows:

*Generally acceptable. There seems to be a presumption in paragraph 3 that sport and recreation facilities could be designated within the Green Belt. Is this correct?*

*Burgh Heath has already made a case in its draft SPD for a space in Canons Lane for an equipped children's playground and a community garden on the eastern side of the A217. We would like to see this space, where a horse is currently grazed adjacent to Can Hatch, designated for this purpose.*

*In the same document it was pointed out that part of the common near to the Green was originally a cricket field and more recently an informal soccer pitch with a goal post that which was erected and removed seasonally. Mowing of this area continues as part of an annual schedule. The community would like to see this similarly designated as a place for informal games.*

The Borough responded as follows on pp205-6:

Burgh Heath has already made a case in its draft SPD for a space in Canons Lane for an equipped children's playground and a community garden on the eastern side of the A217. We would like to see this space, where a horse is currently grazed adjacent to Can Hatch, designated for this purpose. In the same document it was pointed out that part of the common near to the Green was originally a cricket field and more recently an informal soccer pitch with a goal post that which was erected and removed seasonally. Mowing of this area continues as part of an annual schedule. The community would like to see this similarly designated as a place for informal games.

To inform the Regulation 19 Development Management Plan an updated Open Space, Sports & Recreation Assessment has been undertaken which looks at children and young people provision. The report finds that for the borough as a whole there is need to provide additional children and young people provision when applying Fields in Trust Standards. For Burgh Heath alone, Fields in Trust indicate a need of 2.17ha by 2026/27. Given the constraints in the borough (i.e. the nature of the existing built up area) the report recognises that it will not be possible to provide this need. It therefore recommends that opportunities are explored to provide additional facilities in all wards, particularly those with the greatest deficits; opportunities should be provided to provide play areas within the borough's green fabric, the borough's extensive woodland and other natural areas of the borough.

Updated Urban Open Space Assessment.

In terms of land adjacent to Can Hatch: in line with other authorities and the recommendations of national guidance no sites have been identified to provide this need. The Green has been identified as an area of amenity greenspace and

this typology includes informal sports use.

**The Borough acknowledges that according to Fields in Trust guidelines Burgh Heath alone needs 2.17ha. Whilst it might be the case that this need cannot be fully met we have identified a single site, 0.34ha, that is rented by the tenant farmer to a horse owner. This field is within Burgh Heath and would be eminently suitable for the community garden and the equipped children's playground that our community has prioritized and has pointed to. The OSR1 response on p208 gives support to community gardens. See below:**

**Policy OSR1 now notes that:**

*"Replacement open spaces should be as close to the lost open space as possible", and NHE4(1) looks favourably on "proposals that enhance, extend, or make new provision for allotments or community food growing opportunities"*

**Policy OSR3 in the DMP document states that:**

*"proposals for new or upgraded provision for outdoor sports and recreation, including buildings, structures, synthetic pitches and play equipment should [...] preserve the openness of the countryside and not conflict with the purposes of the Green Belt".*

**We appreciate that this land is Green Belt and cannot be designated as Urban Open Space, further, that it could only have a marginal effect in meeting the identified deficit in land for recreational and sporting activity. Nevertheless this 0.34ha field is strategically sited within the village and offers a unique opportunity to realise both a community garden and an equipped children's playground. The DMP should recognise this and provide a pathway to allow it to be used socially without detriment to the Green Belt.**

**Whilst we had regarded the Borough's initial response to our comment quoted above as opaque and unhelpful we are encouraged by the two italicised qualifications above and believe that that there is an avenue that could allow this multi-generational project with its community garden and equipped children's playground to be realised without harming the Green Belt.**

#### **CONTENTION 4**

**Will the plans for the Banstead Local Town Centre achieve the Core Strategy's aims? – We believe not and would be happy to address this issue at the public inquiry.**

**It is perhaps the most important matter that we wish to pursue. It is fundamental to Place Shaping north of the M25 where Banstead is the only Town Centre. It serves a hinterland of satellite communities and it is this model that is of fundamental concern.**

**Those who attended the Core Strategy public hearing will have heard the inspector say that he would like to see Banstead as a more vibrant, attractive and useful place. There is an echo of this sentiment in the Core Strategy that emerged. The Borough's response to this in the latest DMP document is unadventurous and narrow. It largely concerns itself with enhancements to shopping facilities when it thinks of these three adjectives. It must be realized that people will spend at Banstead Village for reasons that are cultural and social too and it is in these contexts that the DMP is frequently lacking.**

**Part of the problem is an unresolved tension between a conservative view of Banstead as a village and the model of a Town Centre that has a wider role and must serve a wider community. Certainly it has valuable village like features that should be preserved.**

**In terms of shopping there is a proliferation of shops some of which are just viable as evidenced by the rapid turnover of uses, many are charity shops and it has an abundance of cafés. So far it has proved unable to sustain a book shop but this could change if a greater footfall attracted one that was part of a chain. We have made the point that a magnet shop, eg a Lidl, would provide useful competition and would be instrumental in increasing the use of Banstead Town Centre. BAN1 contains space that could be made available for this. Almost everyone, when asked, questions whether more small shops are really needed and are extremely surprised when told that shops are to be included in the development of the Horseshoe.**

**An unexpected by-product of failing shops is the café culture that has emerged, it was certainly not planned. In this sense Banstead really has become more vibrant socially.**

**With regard to space for cultural activities, Banstead fails its hinterland. One example of this the St Cecelia Chorus which is a high quality amateur choir that was founded in Banstead but has no home there; it rarely performs in the north of the borough, but generally in Sutton, Cheam, West Croydon and sometimes in Epsom. Why is this? The Community Centre in BAN3 lacks flexible seating for performances, is ill equipped and acoustically poor for musical performances. The same weaknesses affect theatre in AREA 1 where amateur dramatics is performed in village and church halls.**

**These examples highlight the need for a performance space suitable for theatre and music for an audience of 200-300. The Community Centre is aging and nearing the end of its lease, now is surely the time to put in place plans that would meet these needs. This opportunity could also be used to address a need for acoustically insulated rehearsal space and a practice studio for young people. All of these initiatives would give weight to the eastern end of Banstead Village which is currently rather lost and detached.**

**The plan for the Horseshoe is ill defined and lacking in specificity. There are significant opportunities here to refashion the library and clinic site to provide a new library coupled to a wider range of facilities including an area for artistic display for use by schools and amateur groups, meeting rooms for societies as well as lecture space, not to mention a Borough information centre for the north of the Borough. The same building could contain facilities for old people as well as a clinic. The whole would be an important enhancement to the facilities available to people in AREA 1.**

**We reiterate the comments that we made in the Regulation 18 consultation about BAN3:**

BAN3: Banstead Community Centre, Park Rd, Banstead

*This site, separate from the commercial centre of Banstead, could be used to provide a cultural centre for the Banstead area. It should be seen as a cultural magnet.*

*The Community Centre could be refashioned, perhaps repositioned, to provide modern meeting rooms, an art gallery/exhibition space and/or an arts cinema. Facilities for young people could include a sound proofed music studio and rehearsal facility.*

*A versatile performance space with flexible seating for 200-300 would be a great local asset and help to give Banstead the vibrance that is sought. If a right of way for cars could be established between the commercial "magnet" site and the new cultural centre their car parks could be shared and their use optimized.*

*The concept of a cultural centre here is not of a commercial facility but one that provides a resource for local amateur groups creating a social catalyst that would be another magnet for Banstead.*

**An essential feature of a successful model for Banstead must be the public transport links that make it work by allowing residents in the satellite communities to enjoy the Town Centre during the day and in the evening. Burgh Heath and Kingswood are just two of the satellite villages that lack public transport and are completely dependent on cars.**

**The Borough recognizes that public transport planning is the responsibility of the County and that the Borough can only advise. But it must surely be an integral part of the plan for Banstead Town Centre to formulate a workable plan for local public transport now, that demonstrates the viability of its**

**concept. The onus must then fall on the Borough and County, working together, to see that it is realized.**

**To conclude, we contend in this section that there is a serious risk that the treatment of Banstead Town Centre will degenerate into a lost opportunity for the people of AREA 1.**

**Other Banstead relevant material that we presented from Regulation 18 is included for completeness in Appendix 2.**

## CONTENTION 5

**Our final topic concerns the designation of Areas of Special Townscape Importance. We had commented in the Regulation 18 consultation as follows:**

The concept of an Area of Special Townscape Importance seems a good idea and should be reserved for areas that are truly distinctive. In Burgh Heath there are two areas that deserve consideration, Ballards Green because of its art deco style and the border of Burgh Heath pond with the Green because of its background to the pond providing a special character. More information is necessary.

This suggestion is not being taken forward as it is not considered necessary – buildings of architectural merit, as well as historical merit, are already covered under NHE7 (now NHE9) and supplementary design guidance can be used to encourage locally sensitive design and the protection of important local character

No change

**Whilst we accept the response regarding Ballards Green, the argument about the border between the buildings at the Green that fringe the Pond is different.**

**There are two aspects to this, the view across the Pond towards the new and old houses that border it is distinctive and special.**



**Secondly the nearer view of the Pond at the edge of the Green development with wildlife (Canada geese, ducks and heron) reeds and the new buildings that provide a harmonious background is equally special.**



**The whole provides an exemplar of how integration between the built community and the natural surroundings has been successfully achieved, it is a truly special townscape which we believe merits the designation with its associated protections.**

**Please note that we do not seek this designation for the whole of the Green development but only that part of it that is the transition to the Pond and the adjacent common. This is not easily seen and we would encourage the inspector to explore the area that we have defined to gain a full appreciation.**

## **APPENDIX 1**

### **The Burgh Heath Development Group's Summary of Responses to the Borough's DMP Regulation 18 Consultation Document Published in 2016**

#### **ACCEPTED MATTERS**

RET2 Secondary town centre frontages for D1 uses too: social, cultural, education and training

RET3 Burgh Heath local shopping area is now well defined, expansion outside this not allowed

RET6 Special review needed for assemblies of small units out of town

DES3 Supplementary Planning Guidance would be needed to protect Pond frontage and areas with a special architectural style

DES10 Illuminated, moving advertisements to be generally restricted not just in conservation areas.

OSR1 Remote replacement of urban open space only in exceptional circumstances and then close by.

Encouragement given to communal self-grow possibilities(community garden): "proposals that enhance, extend, or make new provision for allotments or community food growing opportunities"

OSR3 The common area near to the Green has been identified as an area of amenity greenspace and this typology includes informal sports use.

OSR? Ballards Green to be formally designated as urban open space

CCF1 Communal heating systems to be encouraged where possible

NHE3 Offsite replacement of trees and woodland only to be permitted exceptionally

TAP1 Accessibilty criteria now changed and table refined

#### **CONTENTIOUS MATTERS**

1, EMP8 Training opportunities in building trades required from developers, why not skills relevant to the purpose of the building, who pays, who determines? Why not supplement the Community Infrastructure Levy and make this available to local FE colleges?

2. DES5 Housing mix: mention of social housing is studiously avoided, "affordable" is used in a nuanced way. Formally they are defined differently. 50% and 80% of market rent respectively.

3, OSR3 Outdoor sport and recreation

4. Will the model for Banstead Town Centre achieve the Core Strategy aims of enhanced vibrance and attractiveness: commercially, socially and culturally?

5. The designation of an Area of Special Townscape Importance at Burgh Heath.

## **APPENDIX 2**

### **A reiteration of relevant views about Banstead Town Centre that we expressed in the Regulation 18 consultation**

#### **Section 3: Potential development sites**

##### **Section 3A: Area 1 – The North Downs**

*Banstead is the only shopping centre in Area 1. It serves the needs of scattered communities who regard it as their town centre. The basis of the proposals is, we believe, specious; informal canvasses of a significant number of local residents produce an almost universal response that Banstead does not need more shopping premises. These opinions are generally based on a perception that those shops that already exist have difficulty in surviving, they need more custom.*

*There is an unfortunate proliferation of charity shops, opticians and cafés but this not the type of retail that serves every day needs. If Banstead really is to be an attractive and useful retail centre it needs a magnet. An example of this would be a Lidl/Aldi store or a full Marks and Spencer department store. Planners need to consider what these magnets are to be in order to make Banstead a vibrant centre and to create a town plan that accommodates them. Please remember to give weight to opinions from the Banstead Village hinterland.*

*Whilst the Retail Needs Assessment concluded that there is no significant quantitative need for extra convenience floor space in the borough the increase that the Core Strategy seeks in Area 1 of 1200 sqm would be significant. Is it really necessary? Do not confuse this with social vibrance.*

*As far as housing is concerned the housing goal for Area 1 in the Core Strategy seems impossible to achieve. The DMP does not explicitly say, even in principle, how the deficit of 410 new homes is to be met. In every day terms this would be equivalent to a community the size of Burgh Heath.*

*It has been argued that the collection of approved but unused planning applications in Area 1 provides evidence of land sufficiency. There must be regulations that help to ensure that planning applications are used and not simply treated strategically; if they were not, pressure would simply build to create a need for urban extensions. One regulatory scheme could involve revocation if the project were not completed within, say, 3 years, with no new application considered for say, 10 years.*

*It is with this background that the following comments are made.*

**BAN1: - 136-168 High St, Banstead**

*This seems to be the only "magnet" site in Banstead Village that would be sufficiently large to accommodate an "attractive" store. The presence of the Baptist church would be a very significant impediment but if the financial means became available its*

*removal to share the Community Centre site would enhance that site as a cultural centre with modern meeting rooms, an art gallery/exhibition space and/or an arts cinema.*

*Far from providing competition for other shops the magnetic effect could have a very positive consequence of increasing their footfall, helping to sustain them.*

**BAN2: - The Horseshoe, Banstead**

*For reasons already given, there should be no element of retail in zone A. The overall plan for the Horseshoe as a centre for community services should be maintained. The opportunity is, apparently, being taken to enhance these services and modernize some of the buildings. It is not clear why this alone would necessarily require a loss of urban open space rather than a redistribution that might improve access to and use of the green space.*

*The type and configuration of the residential development is not explained but it would be an ideal residential development site with easy access to the town centre and station. It is clear that this alone would inevitably result in a loss of urban open space.*

*Importantly, there should be no loss of parking space, more is needed to support the consolidation of Banstead as an attractive and useful centre.*

*Though the map does not extend to the apex formed by the Brighton Rd and Winkworth Rd this corner would provide an ideal site for a Banstead Fire Station with ready access to the intersection of locally important routes. Consideration could be given to bringing the ambulance station to this site with the possibility of sharing garage and communication facilities. This (would create space that) would allow social and community facilities to be consolidated around the Horseshoe.*

*In overall terms we approve of this plan with minor reservations and feel that there is a need for more detail with a clear statement of how the social and commercial aims for Banstead would be realised.*