

Reigate & Banstead Borough Council

Development Management Plan Proposed Submission Document January 2018

Representations Form



How to submit your comments

This response form has two parts:

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

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

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

You can return your form:

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

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

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

All representations will be made available for public inspection.

Further guidance

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

Part A

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

(1) Personal Details

Title	Mr
First name	Alister
Last name	Fawley
Job title (if relevant)	Development Manager
Organisation (if relevant)	Surrey County Council
Address	County Hall Penrhyn Road Kingston-Upon-Thames Surrey
Postcode	KT1 2DN
Telephone No	020 8541 7930
Email address	alister.fawley@surreycc.gov.uk

(2) Agents Details (if relevant)

Title	Mr
First name	Nigel
Last name	Abbott
Job title (if relevant)	Director
Organisation (if relevant)	WYG Planning
Address	11 th Floor 1 Angel Court London
Postcode	EC2R 7HJ
Telephone No	020 7250 7511
Email address	nigel.abbott@wyg.com

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

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

I would not like to be contacted further

Part B: Please use a separate sheet for each representation

(2) Name/Organisation

Surrey County Council

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

Policy

BAN2

Paragraph

Box/map

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

(a) Legally compliant?

Yes

Yes

No

Don't know

(b) Sound?

Yes

No

No

Don't know

(c) Complies with the Duty to Cooperate?

Yes

Yes

No

Don't know

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

See attached letter.

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

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

See attached letter

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

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

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

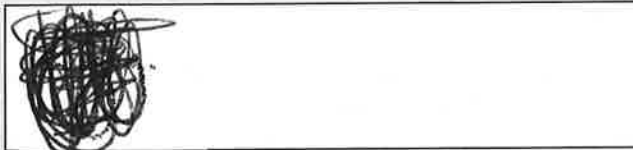
No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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

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

Signature:



Date:

23.02.18



Our Ref: LN3820

Date: 23 February 2018

Reigate & Banstead Borough Council

Planning Policy
Town Hall
Castlefield Road
Reigate
RH2 0SH

Dear Sir or Madam,

SUBMISSION OF REPRESENTATIONS FOR THE REIGATE & BANSTEAD BOROUGH COUNCIL DEVELOPMENT MANAGEMENT PLAN REGULATION 19 CONSULTATION

WYG are instructed by the Property Department at Surrey County Council (SCC) in order to submit representations on its behalf in relation to:

- The Horseshoe Complex in Banstead;
- Colebrook, Noke Drive, Redhill; and
- Former Longmead Centre, Holland Close, Redhill.

SCC has been considering the comprehensive development of their sites affected by the current and past consultations on the Development Management Policies. This letter of representations follows that submitted to the Regulation 18 Consultation by WYG on behalf of SCC dated 6 October 2016. SCC also previously made representations on the Part 2 Local Plan Consultation and proposed that The Horseshoe Complex and Colebrook Centre would be suitable for redevelopment in order to make the best use of the land.

SCC and Reigate and Banstead Borough Council (RBBC) have agreed to work together to improve the quality of life of various communities in the Borough through partnership working and cooperation. SCC have undertaken a review and consulted a range of stakeholders on the future of the above sites.

SCC has concluded that there are a range of service providers that require new accommodation in the short-medium term. In addition to ensure the continuation of service provision where appropriate, we also consider that there is the potential to improve social/community infrastructure and facilities by integrating with other compatible land uses such as retail and residential.

Policy BAN2: The Horseshoe, Banstead SM7 2BQ

Policy BAN2 proposes allocation for comprehensive regeneration as an enhanced location for community/public services. Specifically, a range of community and/or public services, potentially including healthcare, emergency services, library, youth and community facilities. The development is envisaged across three development areas marked as A, B and C. Complementary enabling development includes potentially residential, appropriate for all three sites subject to design and mitigation measures, and retail, leisure and other commercial on potential development area A within the proposed town centre boundary.

Address: 11th Floor, 1 Angel Court, London, EC2R 7HJ
Tel: +44 (020) 7250 7500 Fax: +44 (020) 7250 7501 Email: info@wyg.com www.wyg.com

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Registered Office: Armdale Court, Headingley, Leeds, LS6 2UJ





SCC supports in principle the proposed allocation set out in Policy BAN2 although it is requested that the land to the north of potential development area C be reincorporated back into the development area. This land was included within the allocation put forward as part of the Regulation 18 Development Management Plan Consultation Document.

It is understood that the land to the north of potential development area C which are used as playing fields was removed from the allocation BAN2 following comments received to the Regulation 18 consultation. The comment received raised concern with the loss of urban open space without a detailed assessment of the value of the green corridor and mature trees compared with the development potential. SCC recognise that there are a number of protected trees along the site boundaries and part of this land forms a 'green corridor' along Bolters Lane. Similarly to other allocations, SCC consider that these important landscape and biodiversity features could be protected through 'requirements' set out within the allocation wording itself.

Reincorporating this parcel of land to the north of the potential development area C would benefit the scheme as it would support a more comprehensive development of the site. This area of open space could be retained as such, but better integrated with the community and residential uses allocated through the inclusion of this area within potential development area C.

Policy RTC4: Colebrook, Noke Drive, Redhill RH1 1PT

Policy RTC4 proposes the allocation of Colebrook for a more intensified use of the site including a mix of residential and community uses. The proposal suggests that the site would be appropriate for approximately 110 residential units, including potentially housing for older people. The proposed allocation states that the new community uses could potentially include adult social care. The design will need to include measures to manage and attenuate flood water as the south-west corner is located in Flood Zone 2 and 3a. The existing trees, including those with TPO's, have also been identified as an important landscape feature of the site.

Since December 2017 SCC have been engaging with RBBC in formal pre-application discussions for redevelopment of the site. The scheme presented as part of the pre-application process incorporates two buildings, one as a designated extra care block and a second towards the corner of St Annes Drive and Noke Drive with a central communal square and atrium between two buildings. The pre-application scheme indicates that the allocated site could realistically provide approximately 800sq.m of youth services and 64 residential units located on the upper floors with a separate development of 81 assisted living units making a total of 145 units across the entire site. The scheme also provides a ground floor library and two start up commercial units on the upper floors.

We understand the pre-application feedback received from RBBC on the scheme has been favourable. We consider therefore that the pre-application scheme demonstrates that a greater number of residential units can be provided on the site, alongside with a meaningful provision of community uses.

As such, we consider that Policy RTC4 under-estimates the potential of the site. SCC requests that the capacity figure is increased to 'approximately 150 units' which will more accurately reflect the likely level of provision of residential units, including those for extra care on the site.

Policy RTC5: Former Longmead Centre, Holland Close, RH1 1HT

Policy RTC5 proposes the allocation of the former Longmead Centre for a more intensive use of the site to provide approximately 20 new homes. The existing building is locally listed and is considered to contribute to the historic character of the town centre. The allocation sets out that redevelopment of the site should explore the possibility to retain and convert the existing building, and as a minimum should retain valued/prominent facades of the building. The development will also need to be designed to address and attenuate surface water flood risk.



Considering the existing building is vacant and located within a highly accessible location, in close proximity to Redhill town centre, SCC is supportive of the principle of the allocation for 20 new homes on the site.

SCC would be happy to discuss the representations further with planning policy officers should it be deemed necessary and are keen to maintain ongoing discussion regarding any forthcoming proposals. Should you wish to make contact with WYG in the meantime, my contact details are nigel.abbott@wyg.com or 020 7250 7511.

Yours sincerely,

A handwritten signature in dark ink, appearing as a dense, scribbled mass of lines.

Nigel Abbott MRTPI
Director – Planning

For and on behalf of WYG Planning, Environment & Transport

Cc A Fawley Esq – Surrey County Council Corporate Property Team