

HORLEY TOWN COUNCIL

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Dear Sir or Madam

Response to the Development Management Plan (DMP) Proposed Submission Document (Regulation 19)

I am responding on behalf of Horley Town Council. At our planning meeting, held on 6 February 2018, members discussed the proposed submission Document. The meeting was attended by eight Councillors, but all eighteen Horley Town Councillors have had the opportunity to comment by email. The Council is grateful for the opportunity to comment and the response is set out below.

The Council understands that the submission document is important and complex, but both the Council and residents found the format difficult to deal with and felt that it would have been more accessible and achieved a more consistent approach if all information had been presented by area so that it would have been easier to concentrate on those areas of interest to our residents.

POLICIES MAP HORLEY: (Also refers to HOR10)

The Town Council strongly objects to the inclusion of the racing and soft play centre site on the A23 to the urban site allocations because this would be a loss of an employment and leisure site. This is a busy area that is well utilised.

POLICIES MAP SOUTH:

The Town Council notes that the land parcel at the Gower Road junction with Court Lodge Road and Thornton Place is misidentified. It should be categorised as urban open space.

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EMPLOYMENT- TASK 1 SUPPLY DEMAND & EVIDENCE: (Also refers to HOR 9)

The Town Council feels that it is unclear if the allocation of part of the Forge Wood Development is as a business park and the prospect of the Manor Royal business district continuing to grow, has been considered. The Town Council believes the consultants' reports are biased in favour of making the case for a business park in Horley. The Council questions whether the evidence is sound and robust as some of the figures are historic and whilst some evidence indicates a need; the Council has yet to see evidence that a business park would bring an economic benefit to Horley.

ENVIRONMENT & CONSERVATION – HABITATS REGULATION ASSESSEMENT: (Also refers to GTT 1)

The Council supports the change of the following two sites to authorised traveller pitches in light of the under provision in RBBC of traveller pitches and because these two sites are currently used as unauthorised traveller sites:

- Woodlea Stables up to 4 traveller pitches.
- Treetops/Trentham for up to 2 pitches.

GREEN INFRASTRUCTURE AND STRATEGY PLAN:

The Council noted that 4.13 lists RBBC owned and managed areas in Horley but omits the contribution from Horley Town Council owned/managed areas. Everything should be included.

In 7.1 Fig.7 Scotsman Copse, an area of ancient woodland, has been omitted and should be included.

FLOODING –

- Flood risk assessment level 1:
 - Appendix D – impact of climate change:
 - Appendix F – risk of flood from ground water:
 - Appendix G – flood warning & alert areas:
 - Appendix H – historic flood records:
- Flood risk assessment level 2:
 - Appendix A – site summary sheets:

The Town Council believes that nowhere else in the county is affected by flooding to such a degree or in the same way as Horley. The Town Council feels that it is imperative not to create problems that cannot be solved. It can be seen from the data in the various appendices, listed above, that the Horley area is at risk of flooding from all and any sources and this should mitigate against any further extensions outside of the current or approved built area. E.g. the proposed urban extension in Meath Green Lane. The Council is also concerned over proposals to re-categorise existing flood areas in order to support more development as it has yet to be proven that the flood mitigation schemes will work in those circumstances.

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Horley should be protected from further massive builds until the results of current flood mitigation can be known. The Town Council is also concerned about the impact of flooding to and from windfall sites in the existing built environment.

The Town Council is most concerned to ensure that no area of Horley is re-categorised until it is known that the flood mitigation works. The Council is worried that the flooding will just get worse and mitigation measures will move the problem of the flooding elsewhere rather than solve it.

In addition, the Town Council noted with surprise that no flood protection measures are proposed for Horley given that Horley has the worst problem.

GREEN BELT REVIEW – MAIN REPORT:

The Council finds that the document is giving mixed messages on the Rural Surrounds of Horley (RSH) and appears confused about whether it continues to prevent urban sprawl or is prime for development. The Council supports the idea that the Rural Surrounds of Horley should be re-designated as Green Belt.

The Council would also wish to see the entire length of the current and proposed Riverside Green Chain added to the Green Belt.

GREEN BELT REVIEW – APPENDIX 1 PARCELS ASSESSMENT:

All the areas considered in the parcels assessment mention the importance of these to have the support of the Green Belt and preventing urban sprawl and town mergers. The Green Belt continues to be important to Horley in providing areas of leisure and recreation not to mention its role where it is part of the flood plain. The Council supports the retention of the Green Belt and Rural Surrounds of Horley.

HOUSING - STANDARDS JUSTIFICATION:

The Town Council is unclear about whether sufficient weight has been given to the fact that Horley is in a water stress area which will not be helped by more and more housing. The number of houses that Horley has already taken should also be taken into account.

HOUSING- SAFEGUARDING LAND REPORT FOR DEVELOPMENT BEYOND PLAN PERIOD:

All proposed areas have a potential impact on flooding and highways infrastructure. Before any major development is planned, the Town Council recommends that there should be a flood defence plan for the Burstow stream area.

HOUSING- TRAVELLER SITE LAND AVAILABILITY ASSESSMENT:

Again, the Council is concerned about flooding but is able to support the plan for the field on Bonehurst Rd between the Cambridge Hotel and Lawsons timber yard.

HOUSING- HOUSING MIX:

The Town Council supports this policy.

HOUSING- HOUSING & ECONOMIC LAND AVAILABILITY ASSESSMENT APPENDIX 2.3 HOUSING AREA 3: (Also refers to HOR 10)

The Town Council objects to these sites, such as the racing centre, being allocated to housing with a further loss of employment and leisure space.

INFRASTRUCTURE – PARKING STANDARDS:

The Town Council noted that car ownership per household had increased and felt that the use of light commercial vehicles needed to be taken into account. The Council expressed concern that the impact of the increasing number of commercial vehicles, owned or used by residents, being parked in residential areas has been ignored.

The Town Council supports the change in standards in respect of these being the minimum expected and not the maximum.

INFRASTRUCTURE – HIGHWAYS ASSESSMENT: (Also refers to SRN 1)

The Town Council noted with concern that the A23 Airport Way is designated a hot spot, yet this is also the proposed access point to the proposed new Business Park in Horley.

INFRASTRUCTURE – INFRASTRUCTURE DELIVERY PLAN:

The Town Council noticed the following inaccuracies

- Fig.1 omits HTC as a provider of green infrastructure
- Fig.17, the practice boundary for Birchwood Medical Practice is unclear.
- Para 4.12 mentions 2 sewage treatment works in the borough but omits the Horley works which would make a total of 3.
- Pressure on A23 from Redhill to its junction with Balcombe Road is mentioned but pressure on the section from that junction to the Longbridge roundabout is omitted.
- Issues affecting the Brighton Main Line and the stations in the borough, such as Horley, are omitted.

The Town Council supports any measures to improve access for our cyclists and pedestrians.

OPEN SPACE – HORLEY OPEN SPACE NEEDS ASSESSMENT:

The Town Council noted that consideration had not been given to recent and proposed new facilities at Horley Recreation Ground. The Town Council supports the identifying of Fishers Farm as a site for outdoor sports.

OPEN SPACE – APPENDIX 3: COMMUNITY CONSULTATION:

The Town Council noted that it was difficult to comment as without seeing the responses to the consultation there is not enough information upon which to base a comment. The Council noted that there are a lot of halls and two indoor sports centres in Horley.

OPEN SPACE – APPENDIX 6: PARKS & GARDENS:

The Town Council noted that this list omits the Horley Recreation Ground.

OPEN SPACE – APPENDIX 9: OUTDOOR SPORTS:

The Town Council was concerned that the information was historic and out of date.

OPEN SPACE – APPENDIX 14: CEMETERIES:

The new churchyard in Horley has been misnamed as the disused churchyard.

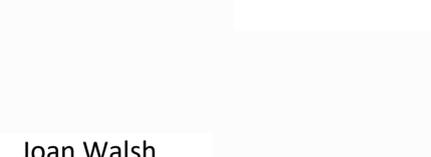
OPEN SPACE – APPENDIX 15: CIVIC SPACE:

The Town Council is concerned that only the High Street has been included for Horley and the two retail areas of the Precinct and Victoria Road have been omitted.

RETAIL – RETAIL NEEDS ASSESSMENT VOLUME 1 REPORT:

The Town Council noted that on page 38 para 4-11 the area denoting the pedestrian priority area is incorrectly marked.

Yours faithfully,


Joan Walsh
Town Clerk
Horley Town Council