



MATTER 9 – POTENTIAL DEVELOPMENT SITES

WED 7 NOV 2018

EXAMINATION OF THE REIGATE AND BANSTEAD DEVELOPMENT MANAGEMENT PLAN

Written statement on behalf of Taylor Wimpey UK Ltd

ISSUE: Whether the proposed site allocations are justified, effective and consistent with national policy in the NPPF.

In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc

9a) Sustainable Urban Extensions

In respect to the following sites:

Policy ERM1 Land at Hillsbrow, Redhill

1. Taylor Wimpey's representations upon the Submitted Plan (page 5) referred to the possible constraints to pedestrian and cycle routes to and from the town centre. The representation also highlighted the pockets of contamination on the site together with ancient woodland which could hinder the deliverability of the site.

Policy ERM2/3 Land west of Copyhold Works and former Copyhold Works

2. Taylor Wimpey consider that this site is appropriately ranked last in the list of sites, which conclusion is informed by the extant permission (until 31st December 2030) for operation and restoration of the landfill on the adjoining site (see information in Appendix 1). This lengthy period could indicate that the site would not be deliverable within the plan period which would suggest that it should be omitted from the plan.

Policy ERM4a 164 Bletchingley Road, Merstham

3. Taylor Wimpey accept this site is appropriately ranked below Oakley Farm (ERM5) within the hierarchy of sites for release in Submitted DMP Policy MLS1, based upon the greater impact on the Green Belt as summarised in table 6 of the Council's Green Belt Review (SD33).

Policy ERM4b Land south of Bletchingly Road, Merstham

4. Taylor Wimpey accept that this site is appropriately ranked below Oakley Farm (ERM5) within the hierarchy of sites for release in Submitted DMP Policy MLS1, based upon the greater impact on the Green Belt as summarised in table 6 of the Council’s Green Belt Review (SD33)

Policy ERM5 Oakley Farm, off Bletchingly Road, Merstham

5. As detailed in the representations on the Submitted DMP, Taylor Wimpey consider that this site could accommodate 145 dwellings, rather than the 95 dwellings detailed in the policy.
6. As detailed in our Matter 5 statement, increasing the number of dwellings on ERM5 will contribute towards addressing the identified shortfall in five years housing supply at 1st April 2019.
7. Our representations also highlight how 145 dwellings can be accommodated on the site (as shown in the illustrative masterplan) whilst including a buffer zone to the Listed Building. Taylor Wimpey note that the Listed Building lies with the opportunity site at the Oakley Outdoor Centre (ref RED6) where up to 30 dwellings are envisaged, through conversion of the building. A copy of the masterplan is attached as Appendix 1.

Policy SSW2 Land at Shawcross Lane, South Park, Reigate

8. As south and west Reigate is the third tier location in Core Strategy policy CS6, it is appropriate that this site is lower in the rankings in Policy MLS1, especially taking account the distance of the site from railway stations in either Reigate or Earlswood.

Policy SSW6 Land west of Castle Drive

9. As south and west Reigate is the third tier location in Core Strategy policy CS6, this site should be lower within the rankings in Policy MLS1, below those in Merstham (ERM4 and ERM5) which are second tier locations within policy CS6. Taylor Wimpey’s representations to the Submitted Plan also highlight that the unusual shape of the site together with heritage and surface water flooding issues are likely to impact upon the developable area of the site and the subsequent yield.

Policy SSW7 Hartswood Nursery

10. As south and west Reigate is the third tier location in Core Strategy policy CS6, this site should be lower within the rankings in Policy MLS1, below those in Merstham (ERM4 and ERM5) which are second tier locations within policy CS6. Taylor Wimpey's representation to the Submitted Plan also highlight issues of contamination and impact upon heritage assets as affecting the developable area of the site and the subsequent yield.

Policy SSW9 Land at Dover's Farm, Woodhatch, Reigate

11. As south and west Reigate is the third tier location in Core Strategy policy CS6, it is appropriate that this site is lower in the rankings in MLS1, below those in Merstham (ERM4 and ERM5).

Policy NWH1 Land at Meath Green Lane, Horley

12. Taylor Wimpey's response to question 2 of matter 5b highlights that delivery of this site is unlikely to occur before 2024/25 at the earliest, so that it will follow construction of the other parts of North West Horley. As the response to question 4 of matter 5a indicates that the authority is likely to have a deficit in 5 year supply at April 2019, as this site would not address this shortfall, it should be placed lower in the order in policy MLS1.
13. The timing of delivery of this site after the remainder of North West Horley was highlighted as a concern for this site in Taylor Wimpey's representation on the submitted Plan. The representations also highlights the location of the northern part of the site within flood zones 2 and 3 which would impact upon its dwelling yield, alongside buffers to address heritage assets.

Policy NWH2 Land at Bonehurst Road, Horley

14. Taylor Wimpey's representation to the Submitted Plan highlighted issues of flood risk and impact upon heritage assets which will affect the deliverability of the site together with its dwelling yield, once appropriate buffers are included. The site also has Tree Preservation Orders within it which will impact upon the layout for any eventual development scheme.

Policy SEH4 Land off The Close and Haroldsea Drive, Horley

15. The only access to the site is through flood zones 2 and 3. Consequently, the availability of a suitable vehicular or pedestrian access avoiding areas at risk of flooding should be considered, otherwise residents would still be impacted at times of flooding. Neither the Strategic Flood

Risk Assessment (Level 2) (SD31) nor the Sequential Test for Flood Risk (SD32) has considered how access to the site can be maintained during times of flooding. The lack of demonstration that safe access is available means that other sites where this can be provided should be considered in preference to this one.

1. Are the reasons for selecting the sites soundly based? Is there evidence that the development of each allocation is suitable, available, sustainable, viable and deliverable?

16. See Taylor Wimpey's response in paragraphs 1 to 15 above.

2. What is the expected timescale and rate of development? Is this realistic?

17. Taylor Wimpey's representation to the submitted Plan alongside its statements to this and matter 5 highlight concerns over the timing of deliverability of the Copyhold (ERM2/3) and North West Horley (NWH1) sites. This is based upon the relationship of development of the former with the restoration period approved for the landfill adjoining Copyhold (ERM2/3) alongside the need for the North West Horley site (NWH1) to follow delivery of the remainder of the extant site.

18. Taylor Wimpey's statement on Matter 5 (question 5) comments upon the robustness of the Council's evidence on delivery. These concerns apply equally to the projections of the MLS1 sites

3. What type of uses and scale of development would each site be expected to deliver? Are these appropriate and deliverable?

19. Taylor Wimpey's representation to the submitted Plan indicate that the Oakley Farm site can accommodate 145 dwellings, rather than 95 as envisaged in the Plan. The information submitted in support of the earlier representations demonstrates that this quantum of development is deliverable on the site¹.

20. Taking account Taylor Wimpey's comments on the other sites allocated in Policy MLS1, it advocates that the order for release should be amended as follows (notwithstanding the Matter 5 Statement indicating that they all need to be released at 1st April 2019 to demonstrate a five year supply):

¹ See our matter 5 Statement, paragraphs 32-35 for further amplification.

- i. SEH4 and NWH2, Horley
- ii. ERM1 – Hillsbrow, Nutfield Road, Redhill
- iii. **ERM5 - Oakley Farm, Merstham**
- iv. ERM4 - Land south of Bletchingley Road, Merstham
- v. SSW6 - Land west of Castle Drive, Reigate
- vi. SSW7 - Hartswood Nursery, Reigate
- vii. SSW2 - Land at Sandcross Lane, Reigate
- viii. SSW9 - Dovers Farm, Reigate
- ix. NWH1 (subject to access through the North West Horley sector)
- x. ERM2/3 -Copyhold, Redhill

4. What are the site constraints, potential impacts or infrastructure requirements of the allocation and how could these be addressed?

21. Taylor Wimpey’s response on this matter for the sites is detailed in paragraphs 1 to 15 (above).

5. Where a site is to be released from the Green Belt, have the exceptional circumstances for releasing the site from the Green Belt been demonstrated? Would the release of the site prejudice or conflict with the purposes of the Green Belt?

22. Taylor Wimpey’s statement on Matter 4 indicates that exceptional circumstances have been demonstrated for releasing the Oakley Farm, Merstham site from the Green Belt. The associated Council evidence referred to in Taylor Wimpey’s statement demonstrates that the release of Oakley Farm, Merstham would not prejudice nor conflict with the purposes of the Green Belt.

9b) Opportunity Sites - General

6. What is the background and justification for the inclusion of Opportunity Sites in the DMP? What status do such sites have? Should they be allocations or should they be considered as windfall sites and assessed as and when they come forward against the relevant policies of the DMP?

23. Paragraph 4.4.10 of the Submitted Plan indicates that **“opportunity sites are sites where availability is unknown or uncertain; however the site has been identified as having some potential for comprehensive development and would be encouraged to come forward for development.”** Given the acknowledged uncertainty of availability of opportunity sites, they should be omitted from the plan and assessed as and when they come forward against the relevant policies of the Development Plan and any other relevant material considerations.
