

Tadworth and Walton Residents Association

Statements re Reigate and Banstead DMP forthcoming examination

Matter 2

2a Policies EMP1-5

Question 5 What justification is there for Article 4 Directions to be used to safeguard employment uses in Principle and Local Employment Areas?

Permitted development rights allowing change of use from employment to residential could lead to a considerable loss of employment land which would be very unsatisfactory bearing in mind the increasing number of households, and therefore need for associated employment, and the fact that no additional land is being allocated for employment use apart from the Horley Business park which is at the southern end of the Borough and connected more with Gatwick. The additional employment is therefore to be achieved by redevelopment at higher densities which may not be appropriate or easy if already occupied.

In the Tadworth and Walton area, we have lost several small office and manufacturing sites in recent years. In the case of Pitwood Park, the only designated employment area in the northern part of the Borough, the Council is already developing the southern part for housing.

The main remaining large employers are largely occupying sites in the Green Belt. Legal and General is one of these but has recently vacated the site and we understand that an application for housing is expected shortly. This site had employed several hundred people, many of them local, until recently. EMP 4 should ensure that the site and similar sites remain in employment use but we are not sure if the application will be refused, particularly if some of the buildings are converted to residential through the permitted development rights.

The other large employer in our area is Pfizer, again in the Green Belt. There have been rumours over a possible move and Brexit is another threat. This site also employs several hundred people.

The Council is always keen to encourage head offices into the Borough but if sites such as that of Legal and General and Pfizer go for the more lucrative residential use, there will be pressures to release more Green Belt land for economic development. The short marketing period of 6 months, although qualified, will not help in attracting a commercial occupier.

We appreciate that a large number of sorely needed dwellings have been created, mainly in town centres, through the permitted development procedure, where there are outdated office blocks, but we consider that it is inappropriate to lose land and premises in the designated employment areas and large sites such as those referred to above.

We therefore propose a new policy. As the serving of Article 4 Directions could affect policies EMP1,2 and 4, we consider it best to propose a new policy on the following lines:-

The Council will serve Article 4 Direction notices on sites covered by policies EM1, 2 and 4, where appropriate, to prevent changes of use from key employment areas to residential development.

Reason

As no new sites are being proposed for employment, (other than in town centres and the Horley Business Park), it is important to retain the designated sites in policies EMP1 and 2 and key employment sites outside these designated areas covered by EM4.

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2b) Policy EMP 4

6) Are the marketing requirements in Annex 3 appropriate and justified, in particular the 6 month marketing period required. Is this too short?

We support the requirements set out in Appendix 3 for marketing commercial sites other than the proposed marketing period of 6 months . We appreciate that the text states ‘at least’ but nevertheless, in practice, the 6 months will be taken as the target.

This length of period may be satisfactory for small retail units in shopping centres but is inadequate in the case of large stand alone sites such as Legal and General, and Pfizer referred to in our response to 2a. In these cases it is important to retain the land in employment use over the long term, unless it is clear there is highly likely to be no demand within the plan period or beyond if approaching 2027.

It is clear to us that, not only is it unsatisfactory to lose this land, but 6 months is clearly too short in the case of large, complex sites. Potential occupiers have to examine the planning history, legal constraints, have discussions with the Council on development potential to meet their needs, quite apart from agreeing a price and detailed terms.

We can appreciate that as residential land prices are considerably higher than that of employment sites, there will be resistance from developers to extending the marketing period beyond the minimum 6 months.

We suggest that one solution is to have a separate policy in Annex 3 for large sites covered by policy EM 4 requiring 12 months or extend the marketing period for 12 months.

2c) EMP5 Secure local skills and training opportunities

Questions 7-9

We support this policy but do not see how it will work in practice, particularly for smaller developments where say carpenters or plasterers may only be on site for a few months and so be unable to complete their apprenticeships but their firms would be required to provide new apprenticeships when moving to a job in a new location. Who would sponsor and provide employment for the existing apprentices to enable them to complete their training.

We presume the construction firms would be required to inform the Council on the progress of the trainees for monitoring purposes.

Tadworth and Walton R A and CPRE Surrey

Matter 4 Green Belt development

NHE5

5) ? Addition to the Green Belt Land adjacent to Wellesford Close

We request that the parcel of land between the A217 and Wellesford Close be included in the Green Belt.

This is former allotment land which was in use in the 1980s. It was designated as Urban Open Land. Subsequently it was removed from protection at the time of the more recent Urban Open Space review.

A planning application for housing was dismissed on appeal in 2009.

We consider that this land forms an important part of the strategic gap between Banstead to the north and Burgh heath to the south. It is particularly important because it can be seen from the A217 and so contributes visually to the separation of the two communities and preserves the openness of this area. There is a footpath along the western side of the site and development would urbanise views.

We understand there are also vehicular access problems.

NHE 5/6 Development in the Green Belt

There is nothing in the DMP about new development in the Green Belt and protecting openness. We consider that detailed guidance is required on the considerations the Council will take into account when considering new development.

NHE 7 Rural Surrounds of Horley

In view of the substantial loss of Green Belt which will result from the proposed urban extensions, and the added complexity of having the separate Horley Rural Surrounds designation and policies, we suggest that this land should be designated as Green Belt.

Policy NHE6 already applies to both the Green Belt and Horley Surrounds. The amendment could be added to NHE5 5)

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Matter 6 Housing Need and the delivery of Quality Housing

Matter 6a) DES 4 Housing mix

Although there is reference to the proportion of market units being of certain sizes, there is no guidance for specific parts of the Borough, unless demand is the same across the Borough, and there is nothing on split between market housing and rental, and the different schemes available such as part ownership.

Guidance seems very limited for developers and unless more information is available the housing needs of the Borough are unlikely to be met.

Matter 6b) Affordable Housing

2. What is the evidence of affordable housing need.

As for 6a) there is little information on the breakdown of types of affordable required or if there are different requirements across the Borough. Little guidance is available to developers who will take the most profitable option rather than what is the greatest need.

There is no reference to the need for social housing, in fact there is no mention of it even though it is now mentioned in the NPPF glossary. 80% market rental is still not affordable for many first time buyers. We note that the Government is proposing to end the cap on council borrowing to build social housing.

The deficiency could be overcome by a new policy in which it is stated that the Council will prepare briefs which will establish the breakdown of affordable housing requirements, including social housing where appropriate, on the larger urban extension sites.

4. Contributions for schemes of less than 11 units

We support the Council's policy concerning provision of a contribution towards affordable housing on schemes of less than 11 units. We appreciate that government guidance requires robust evidence but we feel that there is a strong case in parts of the Borough including our northern area. We also note that there have been recent appeals elsewhere which have been allowed concerning contributions from small development.

In the northern part of the Borough, apart from in Preston ward, many of the developments are of less than 11 units. Most are small windfall sites. This is confirmed in the 2018 housing monitoring report. We feel strongly that developers should make a contribution, even if only for a financial contribution towards off site developments.

We have a development under construction in Tadworth, where the scheme is so far in 3 phases each with 5 or 6 units, but the developer is arguing these are separate projects and so there is no affordable

housing requirement. A contribution per dwelling in situations such as this would at least assist in the provision of some affordable housing in our area.

The policy is subject to viability assessments so there is flexibility to accommodate the less profitable developments. We therefore see no reason why the Council should not require affordable housing, where viable, on small sites.

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Matter 6c) DES 7 Specialist accommodation

It is unsatisfactory that for 25 or more units of accommodation for the elderly or those with support needs, only 4% should be designed to be adaptable to wheelchair use, and even this standard can be reduced if not viable. The figure is even less than the standard in DES6 re affordable housing where 5% of affordable dwellings should be designed to meet the requirements of wheelchair users.

With the percentage of the elderly over 80 increasing, we should have thought that a very high percentage of specialist accommodation for the elderly should either include facilities or be capable of adaptation to wheel chair usage.

There should also be a requirement for a certain percentage to have storage space for mobility scooters.

We have looked at SD6 on housing standards and note that(paragraph 3.23 states that 30 -40% of housing to be built by the end of the plan period should be designed to meet the accessible /adaptable standard (M4(2) and 8 -12% should be delivered as easily adaptable for wheel chair users (M4 3a), although it is stated that viability could be a problem.

The report concludes that in all new housing 20% should be designed to meet the category 2 (accessible and adaptable) requirement with , in schemes of over 20 units, 5% should meet category 3 (wheel chair adaptable).

Surely in housing which is specifically designed for the elderly the provision should be higher than the recommended 5%, not less.

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Matter 7 GTT1 Gypsy, Traveller and travelling Showman

The policy is now clearer than in the draft although it appears that there is a need for 23 pitches in the first 5 years but only 8 are being provided and 4 are needed in the following 5 years when 14 are being provided, still giving a small shortfall.

However, since we made our earlier comments there have been problems of illegal encampments being set up across Surrey and having to be moved on, at expense to the local councils and land owners.

In the northern part of the Borough, for example, there have been incursions onto recreation grounds, car parks and a supermarket car park. However, the Council's background evidence states that there is no demand for transit camps.

This evidence is clearly now out of date. There have been articles in the press complaining about unauthorised encampments across the county, leading to a response from Chief Constable Nick Ephgrave. A copy is attached. He refers to the unprecedented number of incursions this summer but puts the blame on the lack of any transit facilities in Surrey – unlike neighbouring Sussex which has 3.. He makes the case that even if there is just one transit site, it enables the police to direct the encampments to move immediately to the transit site and if they refuse or return to camp unlawfully elsewhere within three months they are liable to arrest. Without transit sites, the police can only move them on.

This is a matter which needs to be considered at county level. We appreciate that most boroughs would be reluctant to accommodate such a use. Nevertheless, there is clearly a need. Surrey County Council has 14 sites throughout the county but none are for travellers in transit.

We therefore suggest a new policy on the lines that

‘The Council, together with Surrey County Council and the other district councils, will investigate the potential for siting one or more transit sites within the County.

The reason is that there has been an upsurge on unauthorised camp sites but at present there is no provision of accommodation for travellers in transit.

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8 Other matters

DES1

Land is a precious resource, especially in authorities such as Reigate and Banstead where, apart from on brownfield land, most land designated for housing is in the Green Belt. It is therefore important to encourage innovative designs with higher densities on the larger sites. Here the development can create its own environment and still provide an acceptable transition to the existing built-up areas and adjacent countryside.

An opportunity has been lost in the development to the North West of Horley.

The evidence provided on densities, as far as we can find, does not refer to density ranges in most of the urban extensions. It may be provided in development briefs but we feel additional information in the DMP would be beneficial.

CCF1 Climate change

We are concerned that the quoted standards in 1a) and 1b) could change over time and become more stringent.

We suggest that

1a) be extended by the phrase 'or any subsequent standard'

And

1b) be extended by the phrase 'or any modification to the DER which is subsequently introduced.'

The reason is to introduce flexibility over time.

TAP 1

We support most of this policy but would like to see some minor changes and additions.

1b)i

We would like to see greater emphasis on adopting new highways. There have been many articles in the press and also local problems arising in Tadworth where residents have experienced difficulties in dealing with parking problems and road and lighting repairs, often at high costs.

In the explanation, we suggest an insert to the effect that the Council in conjunction with the County Highway Authority will encourage the adoption of new highways.

1g)

We suggest after the word 'verges' add 'and replace any dead or damaged trees in the public highway'.

This is because Surrey County Council no longer has a budget for replacing street trees.

New 5)

We suggest add

‘A traffic management plan will be required if there are likely to be problems on the public highway during construction. Contact details of the contractors should be prominently displayed.’

This is because we have experienced problems involving public safety when details of delivery times and routes etc have not been agreed before work commences on site.

Annex 4**Residential**

We welcome the updating of the residential car parking standards, the use of minimum requirements, and flexibility relating to local circumstances. However, although we favour higher residential densities to protect the Green Belt and countryside, and appreciate that additional parking reduces densities, we consider that the requirements are still too low.

There are major problems of congestion in our area due primarily to on-street parking because of the lack of sufficient off street parking. This is happening even in the case of new developments. Bearing in mind higher car ownership rates, the tendency for children to remain in the family home when young adults, frequently owning their own vehicles, many households parking work vans on site, garages frequently being used for storage or converted to living accommodation and inadequate provision for visitors parking for serving trades people and visitors, it is not surprising that there is an increase in onstreet parking..

The accessibility levels are misleading as families with young children, the less mobile and elderly can frequently not walk far to a station or bus stop. Also insufficient account is taken of the usefulness of the rail routes, the train frequency and speed of service. The Tattenham line which serves Tadworth is slow, not very frequent and terminates mainly at London Bridge rather than more central locations. We would like to see more spaces required for 3 and 4+ bedroom houses and an increase also for the larger flats where medium and low accessibility.

Non-residential uses

In the case of non residential parking standards, account should be taken of accessibility. Banstead with its poor accessibility should not be equated with the larger town centres which have better public transport connections. Higher parking requirements should be required for A1-5 and B1 uses..

We would prefer the requirements to be minimum standards in situations like doctors' surgeries where patients frequently can't walk far. There should also be provision with new schools for parent to drop off children, as currently school locations cause significant congestion.

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Matter 8 Other Development Plan Policies continued

NHE 8 Horse keeping and Equestrian development

There is a planning appeal currently in progress concerning a commercial riding school site and change of use to residential, near Kingswood. We would like to see this policy NHE 8 also refer to the loss of important recreation riding establishments and the considerations involved in allowing a change of use – including marketing as set out in annex 3.

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Matter 9 Potential development sites

BAN2

We support development in the Horseshoe area as parts are very run down. However, we would prefer to see a comprehensive master plan for the area rather than piecemeal development with the division into 3 separate parcels.

Parcel A

Our main concerns relate to parcel A. We consider that the whole of this area should be within the town centre boundary as both the parking and community centre are closely linked to the village centre. We appreciate that in the DMP not all car parks are within the town centre boundaries, but in this case the proposed uses of community and public services and the car park will relate and contribute to the functioning of Banstead as a prosperous town centre. It is particularly important that the number of car parking spaces is not reduced as this car park is very well used. The policy states 'retention, re-provision or enhancement', but this does not necessarily imply retaining the same number of parking spaces.

Similarly there is concern that the community centre function will be much reduced and the library which was refurbished a few years ago replaced by an inferior structure in order to provide land for additional development. There is no guarantee that to get a viable scheme the replacement buildings will be of equal quality to the existing and continue to support the town centre.

More information is required on what is proposed in order to support the redevelopment of area A. Although Tadworth and Walton are some miles from Banstead, it is our local centre and so there is concern that there continues to be adequate parking and the community functions are retained. Although Redhill is the main centre for the Borough, it is poorly used by residents north of the M25.

Parcel B

There is the potential to develop this area as a 'Blue light' hub for the police, ambulance and fire brigade. It is unfortunate that this is not proposed at this stage.

In conclusion, we support the improvement of this area which is in need of regeneration. However, we are concerned that, taking into account the need for the public bodies involved to make a profit, there will be a loss of important community facilities currently serving the village centre. The lack of information is a matter of particular concern as we are being asked to support a proposal with insufficient information.

BAN 3

We are very concerned at this proposal. The community hall is the main large venue serving Banstead and surrounding area. It is very well used. Its loss, even if for a short period of time would adversely affect the many users of the hall.

More importantly, we cannot envisage how it could be economically viable to finance its demolition and replacement with a facility of similar size through the construction and sale of only 15 new dwellings. The economics would not work. We are also concerned about the possible loss of parking for the hall. As it is remote from the centre's public car parks, any reduction in the number of spaces would affect the use of the facility. There is little suitable on-street parking to make up any shortfall

as a result of redevelopment of the site. As it is highly unlikely that 15 new units would pay for a hall of similar size, we request that this proposal is deleted.

CPRE Surrey

Matter 11

Policy MLS 2 Safeguarded land for development beyond the plan period

We object to the proposal to safeguard part of Redhill Aerodrome and adjacent land for several reasons which are set out below..

Infrastructure and prematurity

First we consider that the proposal is premature as it is not known if additional land will be required beyond 2027. The Copyhold site will be developed at a later date and there is a good supply of windfalls coming forward. We appreciate that the current housing targets will be subject to review but the ONS latest household reductions suggest that there will not be a large uplift at the time of the next review.

The proposal is also premature because at the time it was put forward, Tandridge District Council had not decided whether to identify its part of the aerodrome as a garden village location. Since then, partly because of timing difficulties and uncertainties about the feasibility of a link from the M23, a decision has been made to promote a settlement at South Godstone. It would not be feasible to develop the Reigate and Banstead site without a link to the M23 through land in the district of Tandridge.

Quite apart from the Tandridge situation, it is very doubtful if a new junction would be acceptable on highway terms quite apart from the heavy costs involved. In any event it would be very long term. There are problems already with the M23 junction with the M25 and it is likely that this will require improvements before consideration can be given to a new link.

The A23 is already very congested and although some local improvements are proposed, it is unlikely that it can accommodate the amount of traffic envisaged from the proposed development of this land.

Green Belt

We appreciate that if necessary, Government policy suggests the safeguarding of Green Belt land to ensure that the longer term housing needs can be met and green belt boundaries do not have to be frequently modified. However, as mentioned above, with windfalls and other sites coming forward plus the reduction in the rate of new households being formed, we do not consider that at the present time there is any clear justification for releasing further land from the Green Belt. The special circumstances do not exist. Further research is required and this should be considered at the next review when the implications of the latest projections will be clearer.

We note that although the land will be treated as if it continues to be Green Belt, in fact it will be taken out of the Green Belt. We are suspicious that if the Green Belt designation is removed, it is unlikely to be reinstated. We have noted this to be the case in other Surrey local planning authorities.

The size of site is extremely large and extends well beyond the boundaries of the Redhill Aerodrome, We cannot believe that it would yield only 4 years housing supply based on current requirements. The densities would clearly have to be very low at the rate proposed and is therefore a waste of valuable greenfield land.

One of our main objections to the proposal is that it will destroy an important area of open countryside/ Green Belt. We note that at the time of the initial assessment it came out as moderate impact on sprawl, high on settlements merging and moderate on encroachment to the countryside. We agree with these assessments and do not consider that anything has changed since then. The Green Belt is already narrow and fragmented in this area. We are particularly concerned about the merging with Redhill, Salfords, Whitebushes and Nutfield. Reigate/ Redhill is already a large conglomeration. This proposal would lead to a negligible gap with Redhill to the north and Horley to the south. In terms of impact on the Green Belt it is unacceptable and the dubious housing requirements do not outweigh the harm which would result to the Green Belt.

To conclude, this proposal should be deleted at this stage and brought back at the next review, but only if the need for additional housing land and the feasibility of the M23 junction are clearer and more a more detailed analysis is carried out on the impact on the Green Belt.