



Development Management Plan (Regulation 19) Town Centres Frontages

October 2017

1. Introduction

- 1.1 This paper has been prepared to support the Regulation 19 Development Management Plan.
- 1.2 To inform the Regulation 18 Development Management Plan consultation, a town centre evidence paper¹ was produced which defined primary frontages and primary shopping areas for Banstead Village and Horley and primary and secondary frontages and primary shopping areas for Redhill and Reigate.
- 1.3 This paper has reviewed these designations to reflect changes within the town centres (for example, planning permissions granted and changes of use) and to reflect the comments received at the Regulation 18 Development Plan Consultation.

¹ http://www.reigate-Banstead.gov.uk/downloads/file/2637/town_centres

2. Background

- 2.1 This chapter firstly outlines the policy context and then the characteristics of the town centres.

Policy Context

National Planning Policy Framework (2012)

- 2.2 The National Planning Policy Framework (NPPF)² recognises town centres as being at the heart of the local community and therefore requires local planning authorities to pursue policies to support their vitality and viability. To do this, local planning authorities are required to define the extent of town centres and primary shopping areas based on clear definitions of primary and secondary frontages; and set policies that make clear what forms of development will be permitted in such locations.
- 2.3 The NPPF defines town centre uses as: 'retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-thru restaurants, bars and pubs, night clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)'.
- 2.4 Whilst the NPPF does not provide specific guidance on drawing shopping frontages and primary shopping areas nor defining primary or secondary shopping frontage thresholds, definitions in Annex two give an indication of what uses should be considered:
- **Primary Frontages:** include a high proportion of retail uses which may include food, drinks, clothing and household goods
 - **Secondary Frontages:** provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses
 - **Primary Shopping Area:** a defined area where retail development is concentrated, generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage

National Planning Practice Guidance (2014)

- 2.5 National Planning Practice Guidance (NPPG)³ says that local planning authorities should plan to positively support town centres to generate local

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

³ <https://www.gov.uk/guidance/ensuring-the-vitality-of-town-centres>

employment; promote beneficial competition within and between town centres; and create attractive, diverse places where people want to live, visit and work.

- 2.6 In order to assess the viability and vitality of town centres, the NPPG says that the following factors should be taken into consideration:
- The diversity of uses
 - Proportion of vacant street level property
 - Commercial yields on non-domestic property
 - Customers views and behaviour
 - Retailer representation and intentions to change representation
 - Commercial rents
 - Pedestrian flows
 - Accessibility
 - Perception of safety and occurrence of crime
 - Environmental quality

Borough Local Plan (2005)

- 2.7 The Borough Local Plan⁴ forms the principal planning document for the borough;; the retail policies will be superseded by the Development Management Plan.
- 2.8 The Borough Local Plan defines primary shopping areas in all four towns and secondary shopping areas in Reigate and Redhill. The primary and secondary shopping areas contain, respectively, primary and secondary retail frontages. These are detailed in Appendix one.
- 2.9 The frontages are subsequently defined alphabetically and changes of use are measured against the specific alphabetised frontage.
- 2.10 Policy Sh7 seeks to maintain a minimum of:
- 80% occupancy of Class A1 retail frontage in primary shopping areas in both Redhill and Reigate town centres
 - 75% occupancy of Class A1 retail frontage in Banstead Village
 - 70% occupancy of Class A1 retail frontage in Horley
- 2.11 Within both Redhill and Reigate's secondary shopping areas, Policy Sh7 seeks to maintain a minimum of 66% A1 occupancy of defined retail frontages.

Core Strategy (2014)

- 2.12 The Core Strategy⁵ supports the management, growth and role of the borough's retail centres. Policy CS7 sets out the retail hierarchy:

⁴ http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/887/borough_local_plan_and_proposals_map

- Redhill: the primary town centre, the focus for large-scale leisure, office, cultural and retail uses and developments
- Banstead Village, Horley and Reigate: the Council will seek to maintain a balance of uses and development that promote the vitality and viability of the town centres

2.13 The Core Strategy policies with the DMP policies will supersede the 2005 Borough Local Plan policies.

Retail Needs Assessment (2016)

2.14 Reigate & Banstead Borough Council commissioned Peter Brett Associates to undertake a retail needs assessment⁶ in 2016. It assessed:

- Quantitative retail needs: the scale of comparison and convenience floorspace required for the borough and its distribution across the town and local centres
- Qualitative retail needs: the type, format and nature of retail space likely to be required across the borough
- Deliverability: advising on the options available to the Council to deliver the quantitative and qualitative retail needs identified

2.15 At a borough level, no capacity for additional convenience floorspace up to 2032 was identified and limited comparison was (maximum of 22,400sqm by 2032). However, the study recommended that qualitative needs (in particular overtrading) should be recognised when planning for retail floorspace.

2.16 For Reigate:

- Comparison floorspace need of 2,500sqm by 2027. This is expected to be met through a combination of minor extensions and improved performance of existing floorspace.
- The Town Hall site is being promoted for mixed use development by the Council – such a development would meet the limited quantitative need for the convenience sector and would help meet the qualitative need that exists due to significant overtrading in stores such as Morrison's in Reigate and Sainsbury's in Redhill

2.17 For Redhill:

- The comparison goods need is estimated at 7,500sqm by 2027. It is expected that the need by 2027 can primarily be met by the development sites already identified as part of the Council's regeneration proposals (Marketfield Way, Cromwell Road, Liquid & Envy and Redhill Station Car Park and Redstone Hill).

⁵ http://www.reigate-Banstead.gov.uk/downloads/file/3073/adopted_core_strategy_july_2014

⁶ http://www.reigate-Banstead.gov.uk/downloads/file/2634/reigate_and_Banstead_retail_needs_assessment_volume_1_report

- Areas of the town centre were also identified (such as Central parade) which could improve performance of the town centre through enhanced asset management rather than wholesale redevelopment.

2.18 For Horley:

- Comparison goods need for approx. 800sqm by 2027. This is expected to be accommodated as part of mixed use developments, as well as minor extensions to existing floorspace.

2.19 For Banstead Village:

- Comparison floorspace need of about 900sqm by 2027. It was felt that this could be met through improved performance of existing stores and small scale extensions or new provision.

Town Centre Monitors

2.20 The Council monitors the town centre occupiers bi-annually and produces an annual monitor⁷. This includes an analysis of:

- Use classes
- Retail offer
- Vacancies
- New occupiers
- Development proposals and changes of use

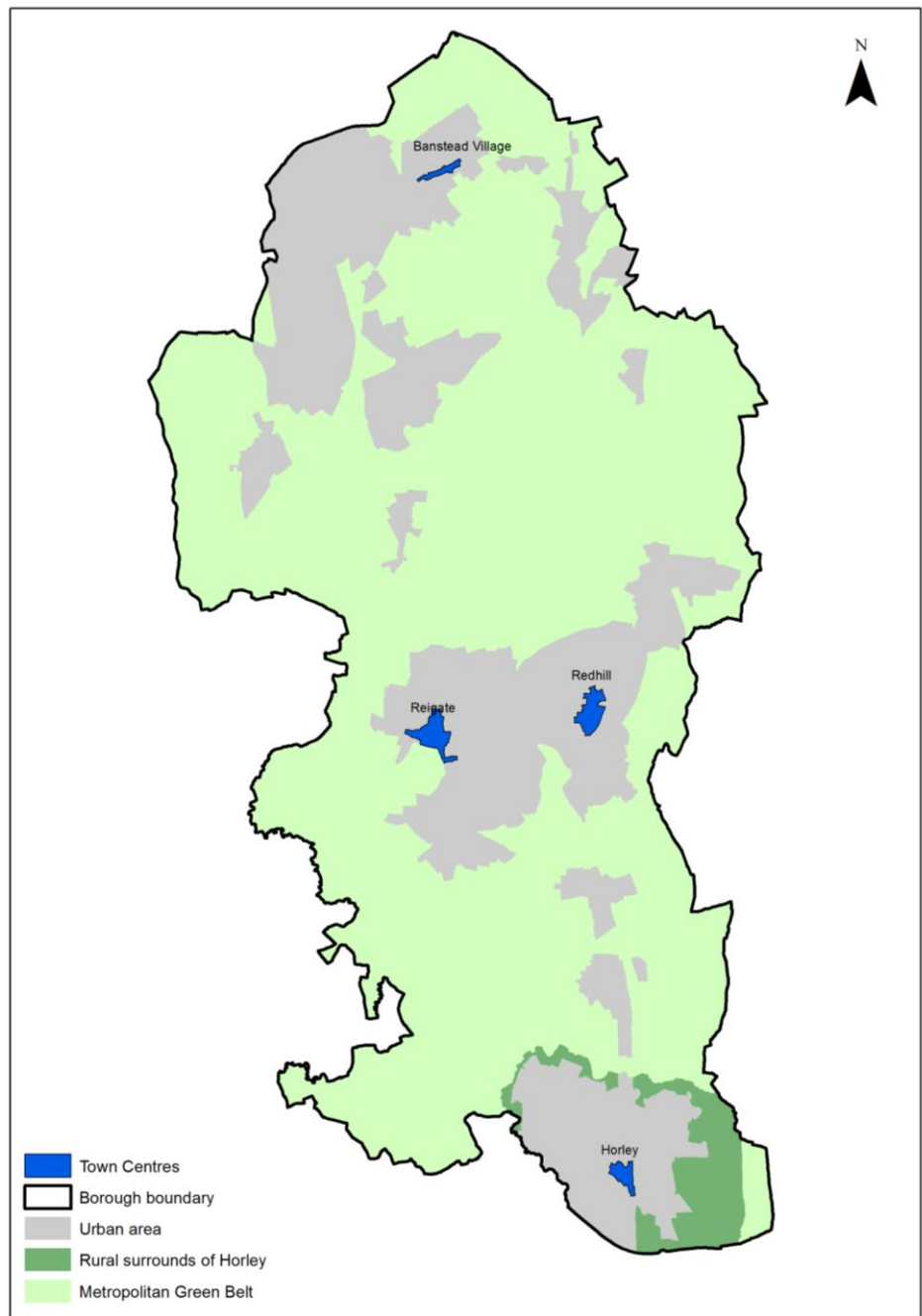
Town Centre Characteristics

2.21 Within the borough, there are four town centres:

- Banstead Village
- Horley
- Redhill
- Reigate

⁷ http://www.reigate-Banstead.gov.uk/info/20280/plan_monitoring/33/town_and_local_centre_monitors

Figure 1 Town Centres



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2.22 The characteristics of the borough's town centres vary in character.

Banstead Village

2.23 Located in the north of the borough, Banstead Village is the smallest town centre. It is an attractive early twentieth century town centre primarily consisting of a unified parade of small retail units built in the 1920s and 30s. There is a small area of green open space outside All Saints Church in the High Street and to the south of the parade there is a park.

Diversity of Uses

- 2.24 The town centre's primary role is to serve the needs of the local population. Services (such as banking and hairdressing) occupy the greatest proportion of units (35%) and convenience retailing occupies the greatest proportion of floorspace (39%). The convenience retail offer is anchored by a large modern Waitrose store in the centre of the parade and smaller food stores including a Tesco Express and a Marks & Spencer's Simply Food. There are also a number of independent/ specialist convenience retailers including Coughlan's Bakery and Edibles Delicatessen.
- 2.25 A third of the units are occupied by comparison retail; the majority of the occupiers are small independents catering to the middle to luxury market offering male and female clothing, gifts, homeware and specialist jewellery.
- 2.26 Whilst there are no leisure (D2) facilities, there are a number of food and drink premises (A3, A4 and A4 Use Classes). These include national retailers such as Pizza Express and Zizzi's; and independent retailers including Banstead Village Tandoori and Ciao Italia. The nearest cinema and theatre are in Epsom.

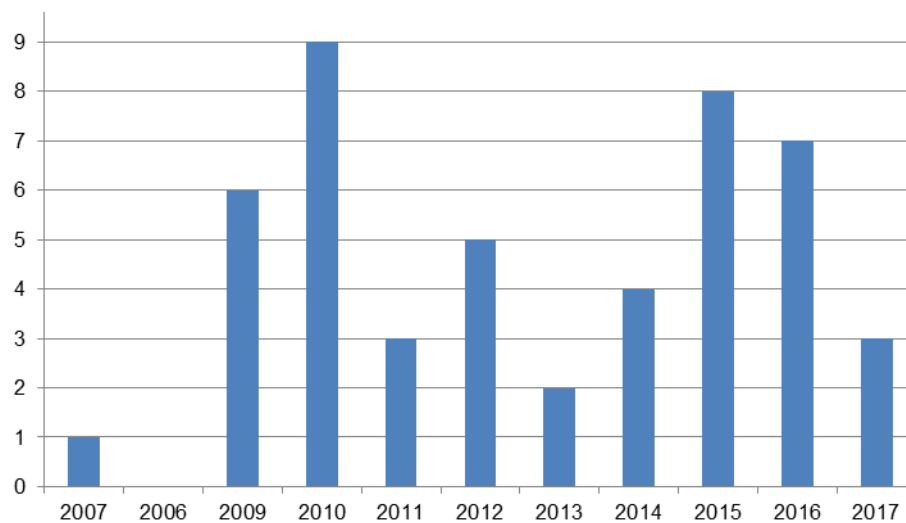
Table 1 Diversity of Uses

	Units		Net Floorspace	
	No.	%	Area (sqm)	%
Comparison	39	33.3	3,077	23.0
Convenience	14	12.0	5,198	38.8
Service	41	35.0	2,661	19.9
Food & Drink	19	16.2	1,986	14.8
Non-retail	1	0.9	210	1.6
Vacant	3	2.6	249	1.9
Total	117	100.0	13,381	100.0

Vacancies

- 2.27 Banstead Village has a lower vacancy rate than the national average (3% compared to 12%). The units that are vacant are relatively small (occupying only 2% of the total floorspace) and are relatively well dispersed.
- 2.28 The table below shows that vacancy levels have started to fall since a peak of 8 units in 2015.

Figure 2 Vacancies



Horley

- 2.29 Located in the south of the borough, Horley town centre is comprised of several shopping areas oriented around the junction of Victoria Road and High Street. Within recent years the town centre has undergone significant redevelopment, as a result the centre is a mix of modern and historic buildings, providing a selection of smaller and larger units for retail occupiers.
- 2.30 The town centre benefits from a pedestrianised high street which provides a pleasant area of public realm, with outdoor seating and planters. The centre has seen public realm improvements within recent years, including the creation of an informal square outside the Jack Fairman Public House. Further environmental improvements are planned as the environmental quality across the rest of the town centre is limited with narrow and poorly maintained pavements.

Diversity of Uses

- 2.31 The town centre's primary role is to serve the needs of the local population. Services (such as estate agents and banking) occupy the greatest proportion of units (37%) and convenience occupies the greatest proportion of floorspace (36%).
- 2.32 The convenience offer is anchored by a large modern Waitrose store on the edge-of (to the south) the town centre, a large Lidl store in the west of the town centre and a Select Convenience store in the centre of the town centre. There are also a number of independent/ specialist retailers including Chris White Butchers and Bobby's newsagents.
- 2.33 Over a quarter of the units (27%) are occupied by comparison retail. A third of these units are occupied by charity/ second hand stores.

2.34 The quality/ offer of retail provision within Horley town centre is limited. Of the Experian GOAD 31 key attractors, the town centre has only one, Boots.

Table 2 Diversity of Uses in Horley Town Centre

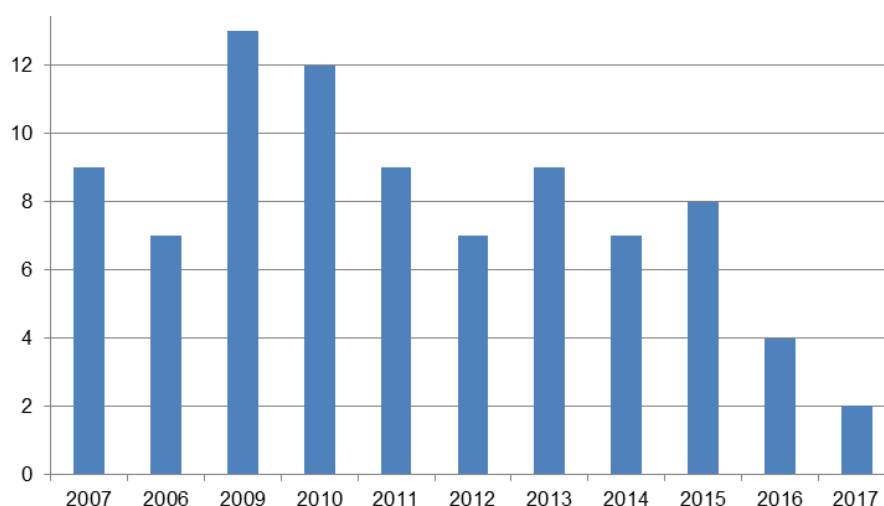
	Units		Net Floorspace	
	No.	%	Area (sqm)	%
Comparison	27	26.7	5,206	30.4
Convenience	12	11.9	6,198	36.2
Service	37	36.6	3,203	18.7
Food & Drink	19	18.8	1,922	11.2
Non-retail	4	4.0	225	1.3
Vacant	2	2.0	372	2.2
Total	101	100.0	17126	100.0

Vacancies

2.35 Horley town centre's vacancy rate lies below the national average (2% compared to 12%).

2.36 Horley was hit hard by the economic downturn, a number of local businesses disappeared and vacancies rose. In 2012, Horley was awarded £100,000 government funding from the High Street Innovation Fund to help reverse this trend and boost vitality within the centre. Vacancy levels have fallen from 13 units in 2009 to 2 units in 2017.

Figure 3 Horley Town Centre Vacancies



Reigate

2.37 Reigate is a historic market town with three main shopping streets oriented around the attractive focal point of the Old Town Hall. The general environmental quality of the town centre is high: there are benches and attractive planters dispersed throughout and the shopfronts are well

maintained and of a high quality design standard. The high street is identified as a pedestrian priority area in the Borough Local Plan (2005), reflecting that the A25 currently divides the town centre into two, however, it is not currently pedestrianised. Priory Park to the south and Castle Grounds to the north provide large areas of green open space.

2.38 Much of the town centre falls within the conservation area - this has resulted in many small, narrow units and made the combination of units/ frontages difficult to achieve. Many premises within the town centre are therefore not suitable for the familiar/ national chain stores which often have minimum requirements for frontage widths and floor areas. This has resulted in Reigate's retail offer being characterised by a high proportion of small 'boutique' and independent units.

Diversity of Uses

2.39 The town's primary role is to serve the needs of the local population. Comparison retail occupies the greatest proportion of the units (46%) and the floorspace (34%). The comparison offer is of a high quality and is oriented towards the middle/ luxury market. It includes many national chains and independent, boutique and specialist retailers.

2.40 The convenience offer is anchored by a large Morrison's supermarket which is complemented by a Marks & Spencer's Simply Food and a number of independent retailers such as Cullenders Delicatessen, Chalk Hills Bakery and Robert & Edwards Butchers. This is also supplemented by a monthly farmers market offering a range of Italian, French and other continental products, alongside fresh vegetables, fish and meats.

2.41 Reigate has a good offer of food and drink premises which tend to cater to the middle end of the market. There is a good representation from both independent (e.g. Little Tuscany and Gurkha Kitchen) and national brands (e.g. Pizza Express, Prezzo and Ask). The centre also benefits from an Everyman Cinema, two private gyms, yoga studio and martial arts centre. Reigate Priory Bowling Club and Reigate Heath Golf Club lie within close proximity to the town centre.

Table 3 Diversity of Uses in Reigate Town Centre

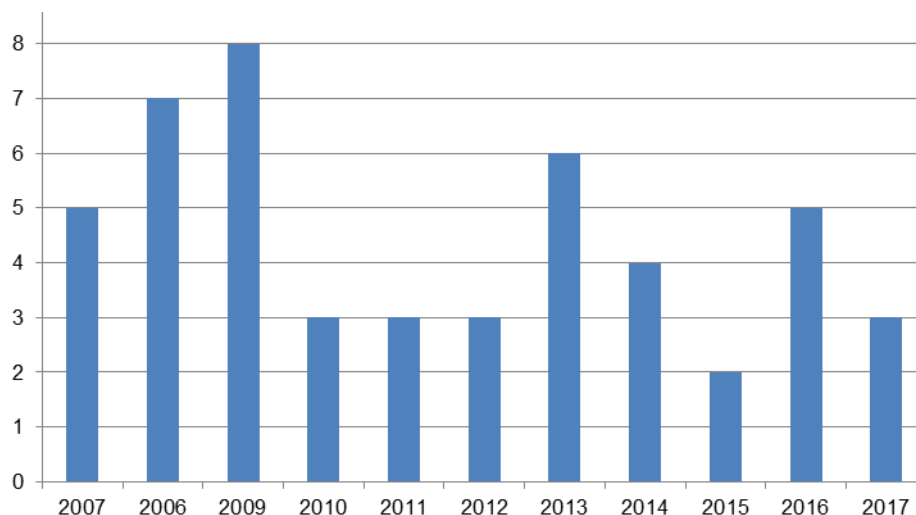
	Units		Net Floorspace	
	No.	%	Area (sqm)	%
Comparison	78	45.9	6,787	34.2
Convenience	10	5.9	5,399	27.2
Service	47	27.6	3,305	16.6
Food & Drink	32	18.8	3,400	17.1
Non-retail	0	0.0	0	0.0
Vacant	3	1.8	968	4.9

Total	170	100.0	19,859	100.0
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Vacancies

- 2.42 Reigate town centre has historically had a low vacancy rate. The current vacancy rate lies below the national average (2% compared to 12%). Within the last twelve months the number of vacant units has fallen from 5 to 3. Two of the current vacant units are in the process of being refurbished.

Figure 4 Reigate Town Centre Vacancies



Redhill

- 2.43 The Core Strategy recognises Redhill as the primary town centre of the borough. Retail activity is focussed around the main pedestrian high street. The town centre is characterised by small traditional units concentrated along Station Road, with the 1990s Belfry shopping centre and associated units dominating the high street. There is a modern development at the northern end of Station Road, which provides larger retailer units on the ground floor.
- 2.44 Major regeneration works have been planned town centre; these are outlined in the Redhill Town Centre Area Action Plan⁸. A new enlarged Sainsbury's supermarket of 15,093sqm of gross external floorspace, hotel and gym is due to open in October 2017 and planning permission (16/01066/F) has been granted for the redevelopment of Marketfield Way to comprise a cinema, new retail and residential units.
- 2.45 Just to the north of the town centre is Memorial Park which has been significantly upgraded in recent years and provides an attractive and valued area of green open space.

⁸ http://www.reigate-banstead.gov.uk/info/20380/current_planning_policy/37/redhill_town_centre_area_action_plan

Diversity of Uses

- 2.46 Given that the Core Strategy recognises Redhill as the primary town centre in the borough, its role is to meet both the needs of its local population and the needs of a wider population.
- 2.47 Comparison retail occupies the greatest proportion of the units (39%) and the floorspace (55%). The comparison offer within the town centre is limited and is oriented towards the lower/ middle market. Most of the occupiers occupy smaller premises and are positioned at the value end of the market. There are some national occupiers, for example Clarks, Topshop and Millets and the offer has improved by the recent opening of a large H&M store in the Belfry.
- 2.48 The convenience offer is anchored by Sainsbury's supermarket which has recently undergone redevelopment works. There are two specialist food stores (United Oriental Mini-Mart and Choice Halal Centre) and a small Co-Operative. Other convenience retail is limited and includes chemists and newsagents.
- 2.49 There is a poor provision of food and drink leisure facilities within Redhill town centre: there is limited representation from national operators, those present include Prezzo and Costa, and independent operators tend to cater for the lower end of the market, with operators including Café Ho and Danny's Café. The town centre does however benefit from the Harlequin Theatre and Cinema.

Table 4 Diversity of Uses in Redhill Town Centre

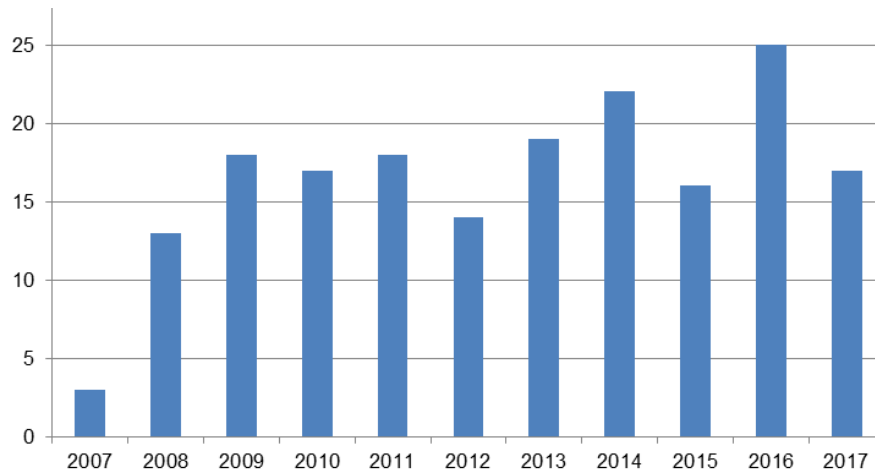
	Units		Net Floorspace	
	No.	%	Area (sqm)	%
Comparison	60	39.2	22,120	54.8
Convenience	13	8.5	8,351	20.7
Service	43	28.1	4,595	11.4
Food & Drink	17	11.1	3,028	7.5
Non-retail	3	2.0	383	0.9
Vacant	17	11.1	1,865	4.6
Total	153	100.0	40342	100.0

Vacancies

- 2.50 Within the last twelve months, the number of vacant units within Redhill town centre has fallen considerably (from 25 units to 17). The vacancy rate now stands at 11%, just below the national standard of 12%.
- 2.51 The vacant units within the town centre are relatively small, occupying only 5% of the total floorspace. 7 of the 17 vacant units are within the Cromwell Road frontage. The units within Cromwell Road are owned by the Council and the

Council's property team is currently in the process of preparing a planning application for the redevelopment of these units.

Figure 5 Redhill Town Centre Vacancies



3. Frontages and Primary Shopping Areas

- 3.1 The Regulation 18 Development Management Plan outlines primary frontages and primary shopping areas for Banstead Village and Horley and outlines primary and secondary frontages and primary shopping areas for Redhill and Reigate. These are detailed in Appendix two.
- 3.2 In the absence of national guidance, the Regulation 18 Development Management Plan took into account:
- Definitions within the NPPF
 - Existing evidence on the occupiers and mix of uses in each of the town centres (as set out in the town centre monitor)
 - Planned and potential development opportunities in and adjacent to town centres (particularly for retail, leisure and business use)
- 3.3 In addition, digital mapping was reviewed and field surveys were undertaken. This helped to identify changes in character (i.e. the perceived 'on-the-ground transition from the retail core), natural breaks in frontage, distinguishable boundary features which in turn were used to inform definition of the boundary of primary shopping areas and town centre uses.
- 3.4 The same methodology has been used to review these recommended designations.

Banstead Village

Primary

- 3.5 The Regulation 18 Development Management Plan town centre evidence paper recommended that the primary frontage should cover all units between Bolters Lane and Buff Avenue on the High Street as there is a strong representation throughout the High Street.
- 3.6 Figure 6 below shows that there is still a good representation of A1 units within the High Street and therefore recommends that this approach is carried forward.

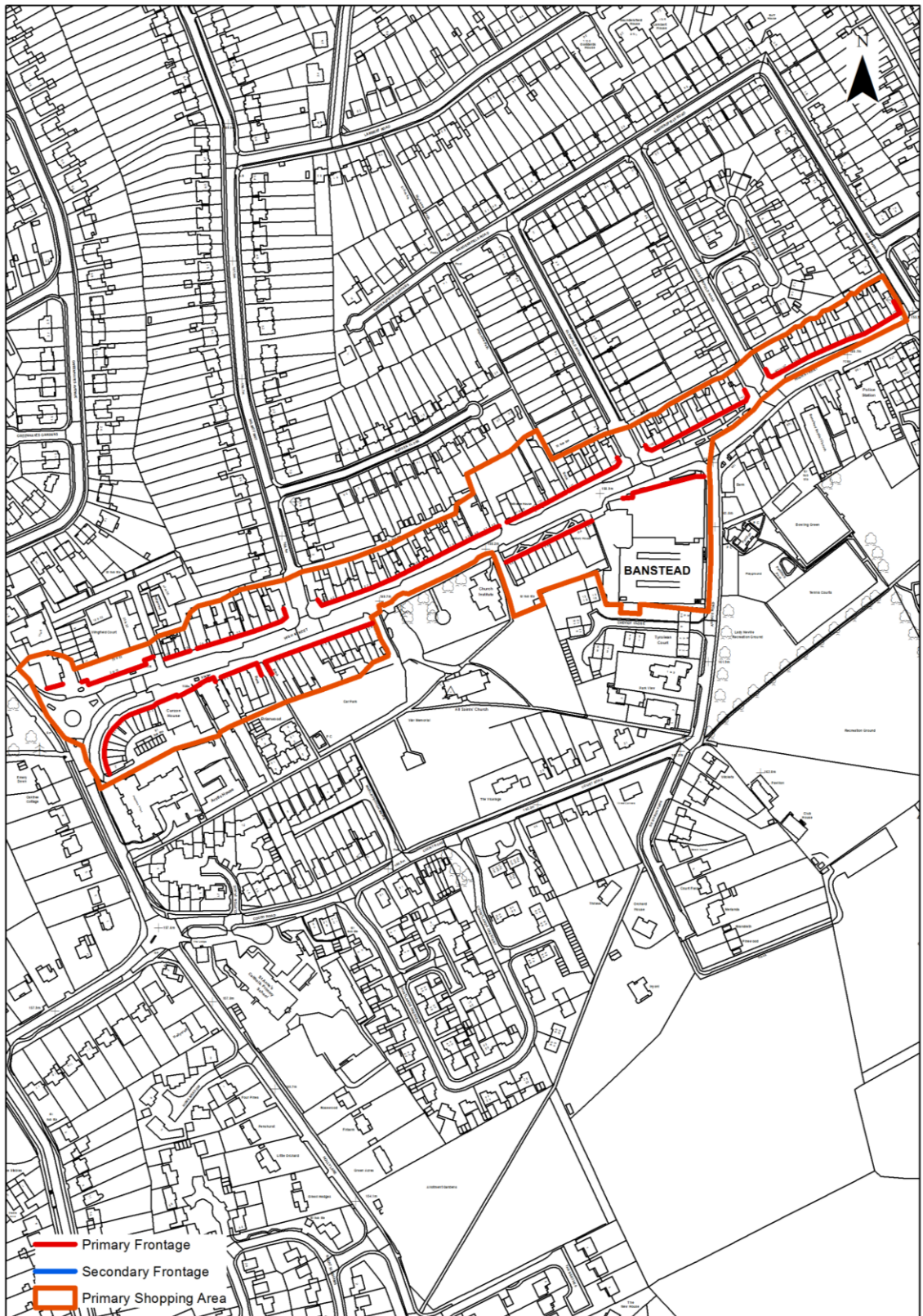
Figure 6 Use Class



Secondary

- 3.7 The Regulation 18 Development Management Plan town centre evidence paper recommends that there should not be a secondary frontage within Banstead Village. It notes that whilst the area to the west of Waitrose between Avenue Road and Chilton Close comprises a variety of units and occupiers including a bank, small retail units, health/ dentistry uses, church and fire station which are consistent with the NPPF definition of a secondary frontage; the nature of the units means that they do not read as a coherent frontage and therefore recommends that they shouldn't be designated as a secondary retail frontage.
- 3.8 Since the development of the Regulation 18 Development Management Plan town centre evidence paper, the type of uses has not changed and nor has the scale of the buildings. It is therefore recommended that the same approach is carried forward.
- 3.9 It is therefore recommended that no changes are made to the frontages and primary shopping area recommended in the Regulation 18 Development Management Plan town centre paper.

Figure 7 Primary Frontage and Primary Shopping Area

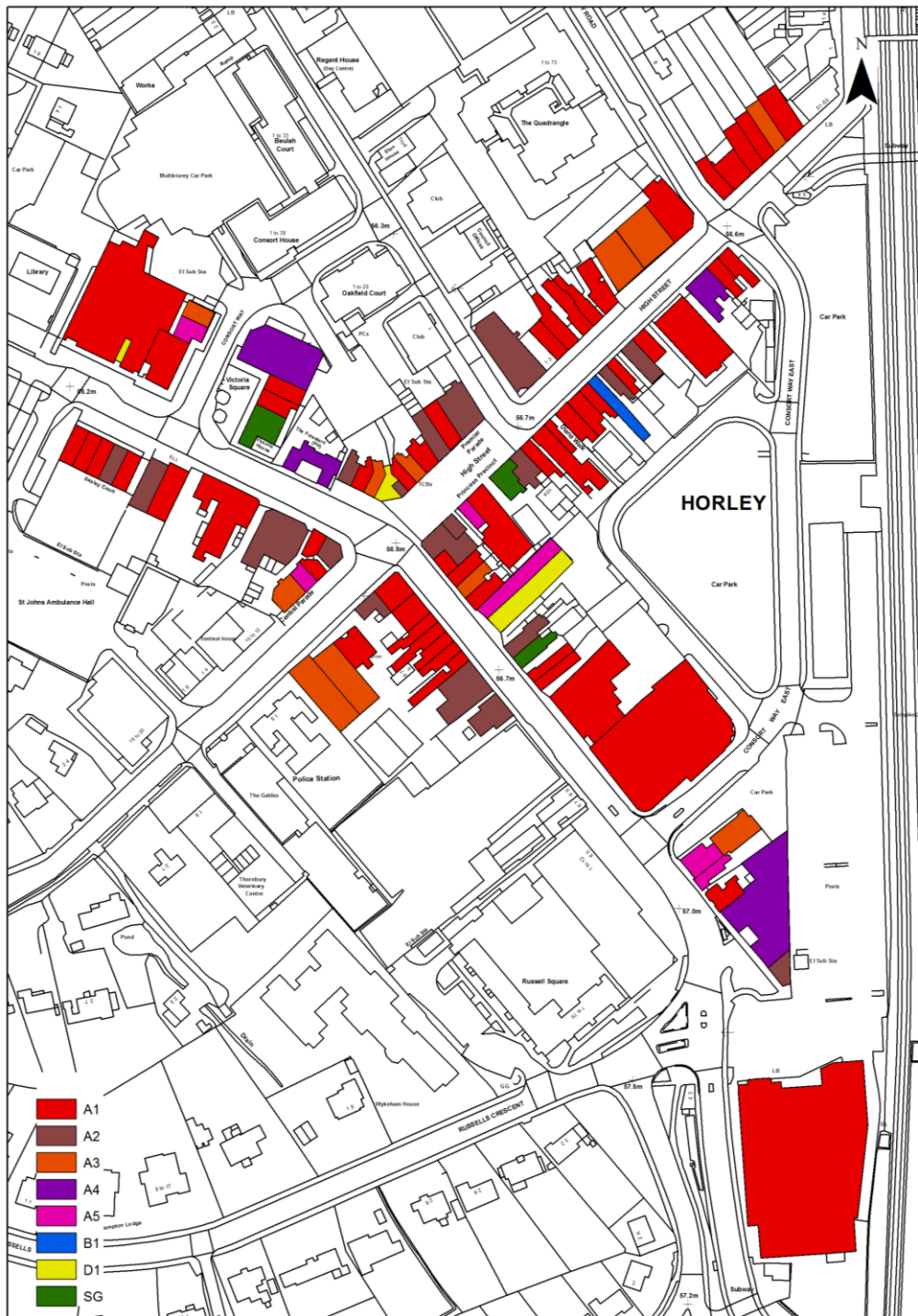


Horley

Primary

- 3.10 The Regulation 18 Development Management Plan town centre evidence paper recognised that there is not a retail core of A1 units within Horley but rather that the A1 units are spread through the town centre. Analysis below shows that this is still true.

Figure 8 Use Class



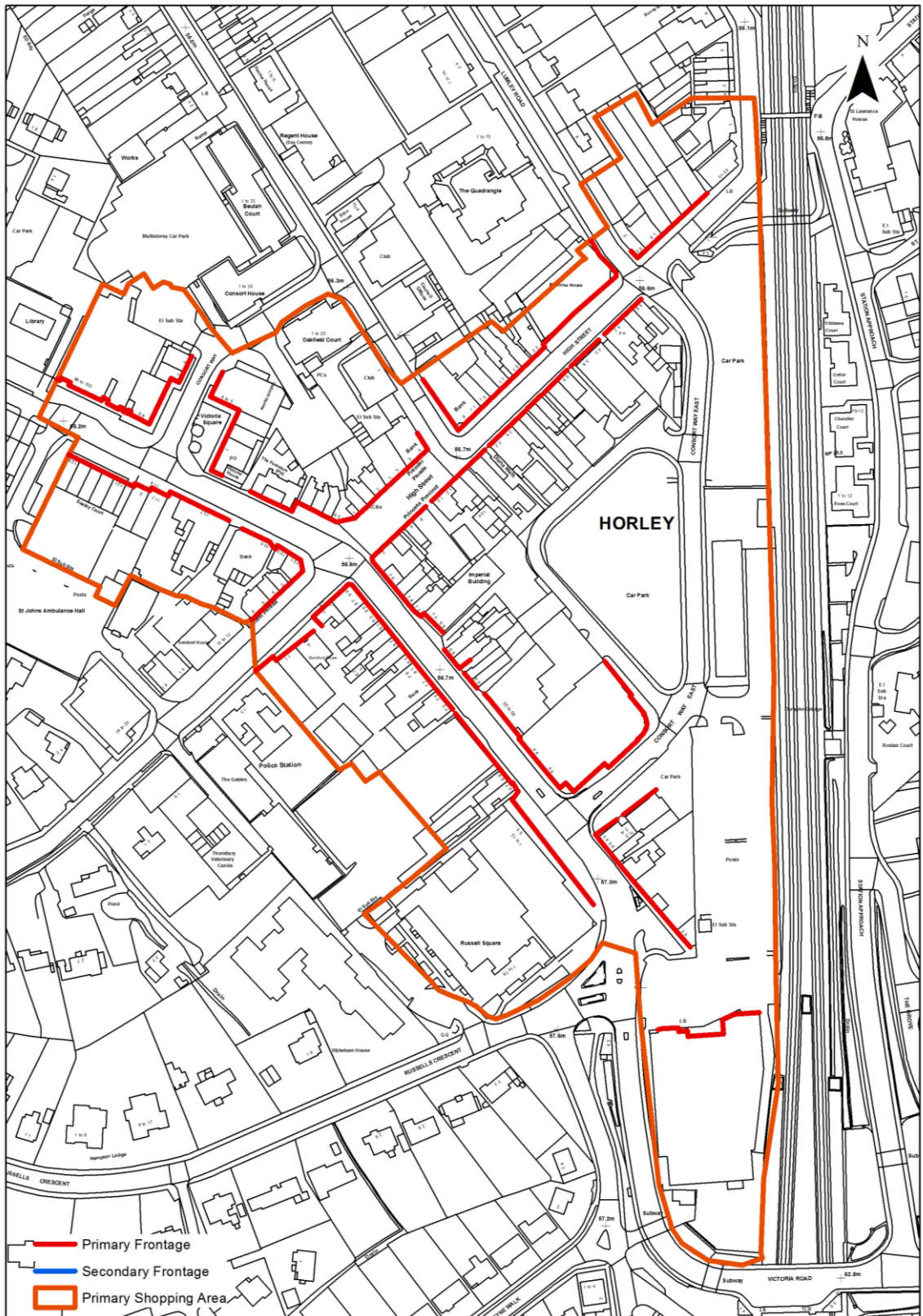
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3.11 The Regulation 18 Development Management Plan town centre evidence paper recommended that the primary frontage should be extended along Victoria Road to include the Land Parcel at 71 Victoria Road where there are two retail units under construction and Russell's Square where there are four newly developed retail units. This is still felt to be applicable.

Secondary

- 3.12 The Regulation 18 Development Management Plan Town Centre evidence paper noted that the analysis of uses within the parade including the Jack Fairman Public House (north of Waitrose) and the parade on the northern side of Victoria Road (between the High Street and the Library) are more varied and could warrant secondary frontage designation, however, as they are bookended by the towns two large supermarkets which warrant primary frontage designation, it was recommended that they should remain as primary frontage as it would not make sense to have secondary frontage in between two primary frontages. Figure 8 above illustrates that this situation is still true, and it is recommended that this approach is carried forward.
- 3.13 It is therefore recommended that no changes are made to the primary frontage and primary shopping area recommended in the Regulation 18 Development Management Plan town centre evidence paper.

Figure 9 Primary Frontage and Primary Shopping Area

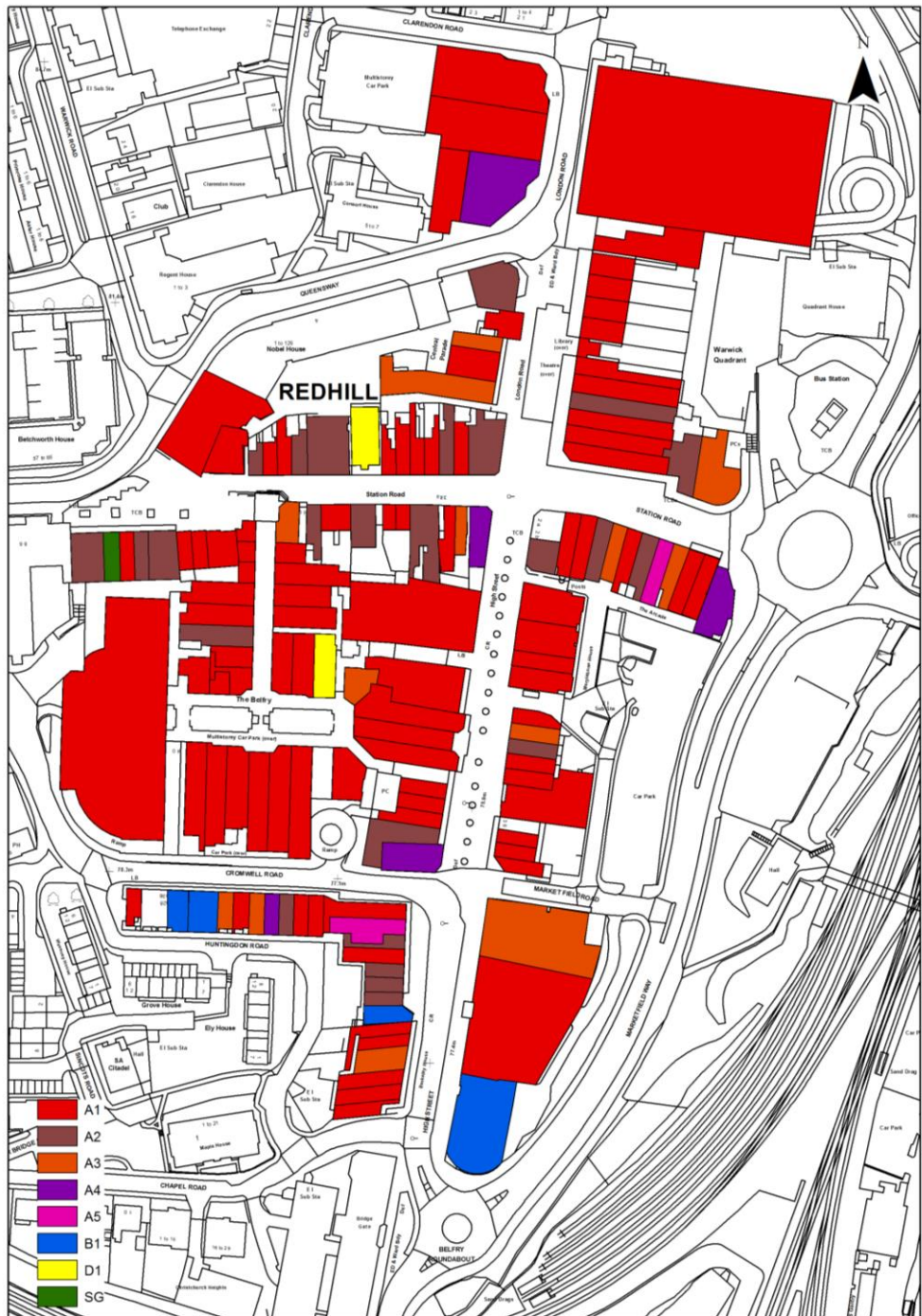


Redhill

Primary

- 3.14 The Regulation 18 Development Management Plan town centre evidence paper noted that there was a strong representation from main A1 uses throughout the pedestrian area and therefore recommended that the entirety of the pedestrian area should be designated as primary frontage. Analysis below shows that this is still true and therefore it is recommended that this approach is carried forward.

Figure 10 Use Class



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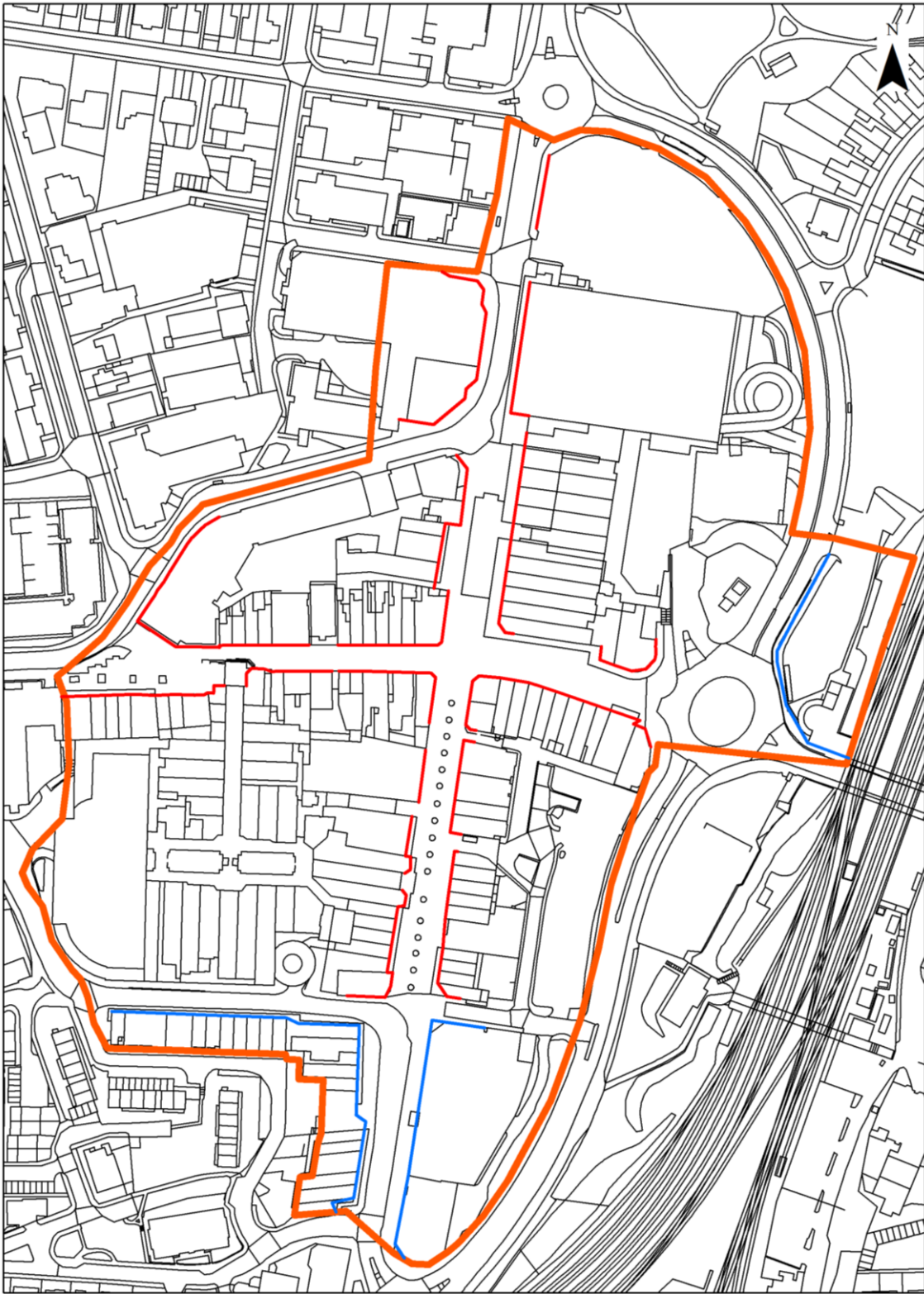
Secondary

3.15 The Regulation 18 Development Management Plan town centre evidence paper noted that the streets adjoining the primary frontage (namely between Gems Hair Salon and Martin & Co Estate Agents on Cromwell Road; between Martin & Co Estate Agents and the Mini Mart on High Street; and between Kingsgate and the former Frankie & Benny's unit) have a greater mix of uses. It therefore recommended that these areas should be designated as

secondary frontages. Diagram 10 above shows that this is still true and therefore recommends that this approach is carried forward.

- 3.16 The Regulation 18 Development Management Plan town centre evidence paper recommended the designation of secondary frontage along Redhill Railway Station as it had planning application for mixed-use retail and residential development. Since the paper was produced the planning application has expired, it is however recommended that the area should still be designated as secondary retail frontage as it is understood that a new planning permission will be put forward within the plan period (2014-2027).
- 3.17 The Regulation 18 Development Management Plan town centre evidence paper also recommended the designation of secondary frontage along the Former Liquid & Envy Nightclub as it had planning application for mixed-use retail and residential development. Since the paper was produced, a new planning application for residential development only has been approved. It is therefore recommended that this area is not included within the secondary frontage.
- 3.18 It is therefore recommended that no changes are made to the primary frontage recommended in the Regulation 18 Development Management Plan town centre evidence paper and that the secondary frontage is amended to exclude the Former Liquid & Envy Nightclub.
- 3.19 It is also recommended that to be inline with the definition of primary shopping areas in the NPPF that the primary shopping area is redrawn to include the primary and secondary frontages.

Figure 11 Primary Frontage, Secondary Frontage and Primary Shopping Area



Reigate

Primary

- 3.20 The 2005 Borough Local Plan allocates primary and secondary frontage for Reigate town centre. The Regulation 18 Development Management Plan town centre evidence paper recommended that the secondary frontage should be incorporated into the primary frontage as analysis showed that there was a good representation of A1 units in the 2005 Borough Local Plan designated secondary frontage. Analysis below shows that this is still true and therefore it is recommended that this approach is carried forward.

Figure 12 Use Class



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Secondary

3.21 The Regulation 18 Development Management Plan town centre evidence paper recommended that the areas which were designated in the 2005

Borough Local Plan as areas of small businesses along West Street and Bell Street should be re-designated as secondary frontages. It was felt that these areas have good secondary frontage uses (as outlined in the NPPF) and that they complement the retail offer within the primary frontages. Analysis below shows that this is still true and therefore this report recommends that this approach should be carried forward.

Figure 13 Secondary Frontage

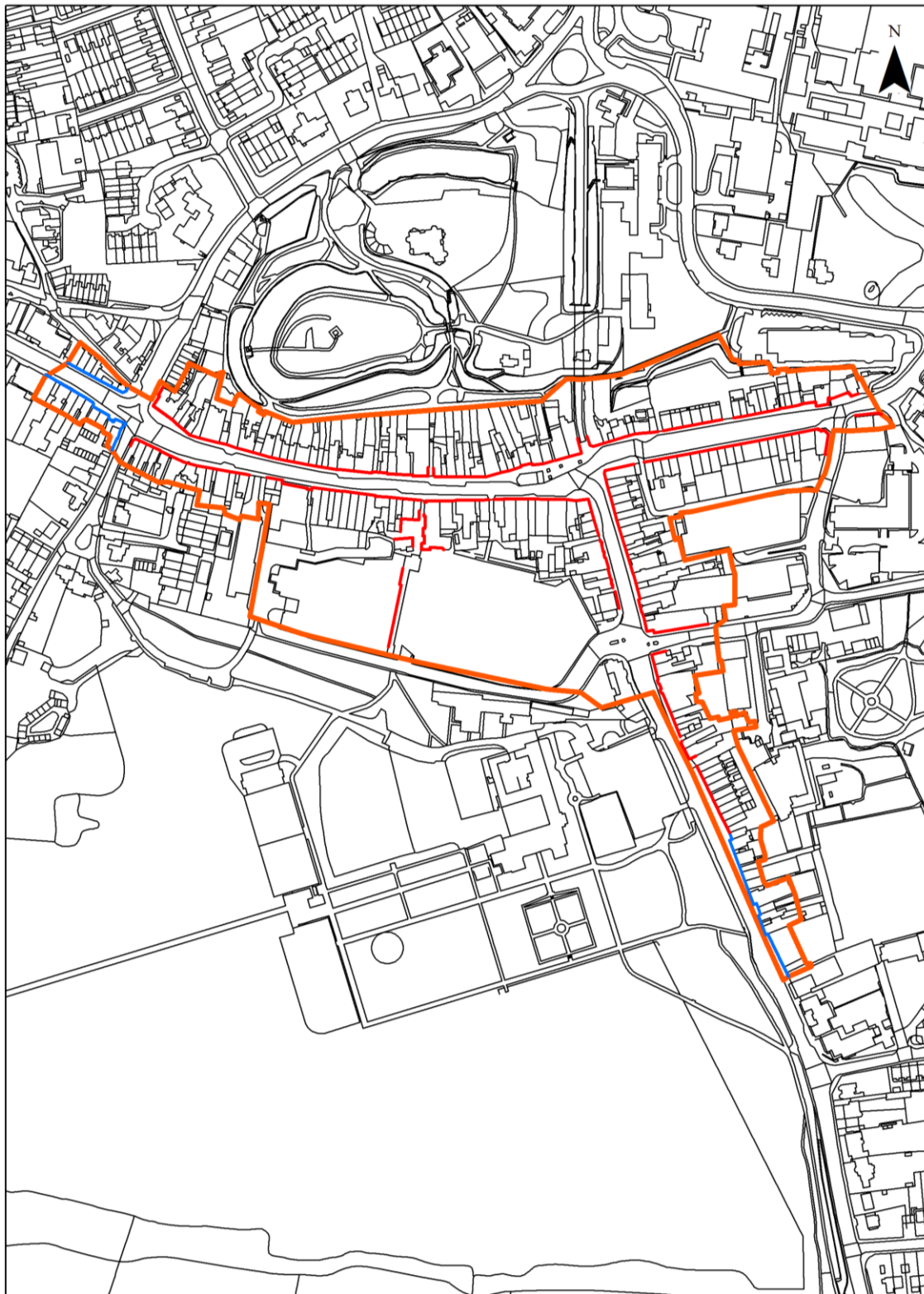


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3.22 It is therefore recommended that no changes are proposed to the frontages in the Regulation 18 Development Management Plan town centre evidence paper.

3.23 It is also recommended that the primary shopping area should be redrawn to be inline with the NPPF and include both primary and secondary shopping frontages.

Figure 14 Primary and Secondary Frontages and Primary Shopping Area



4. Town Centre Frontage Thresholds

- 4.1 Given the lack of national guidance in terms of how to define retail frontage thresholds, the Regulation 18 Development Management Plan town centre evidence paper considered:
- The current A1 rate against the 2005 Borough Local Plan thresholds
 - The actual A1 rate
 - The number of vacant units within the frontages
 - Vacancy patterns over time
 - Planned and proposed changes to the town centres
 - Findings from the Retail Needs Assessment
- 4.2 The paper recommended that within primary frontages:
- Proposals for non-A1 use will be supported provided A1 occupancy compared to the total identified shopping frontage is:
 - Above 70% in Reigate
 - Above 65% in Banstead Village and Redhill
 - Above 55% in Horley
 - Where a proposal would result in the proportion of A1 frontage falling below the relevant threshold, permission will only be granted where:
 - The proposal is for an A3 use in Horley or Redhill and would not bring about an overconcentration⁹ of such uses in the vicinity
 - The unit has remained vacant for at least six months and it can be demonstrated that reasonable attempts have been made, without success, to let the premise for A1 use and that the proposed use would make a positive contribution to the vitality, viability, balance of services and/ or evening economy of the town centre
- 4.3 The paper recommended that within secondary frontages:
- Proposals for non A1 use will be supported provided A1 occupancy compared to the total identified shopping frontage is:
 - Above 55% in Reigate
 - Above 40% in Redhill
 - Where a proposal would result in the proportion of A1 frontage falling below the relevant threshold, permission will only be granted where it can be demonstrated that the proposed use would make a positive contribution to the vitality, viability, balance of services and/ or evening economy of the town centre

⁹ An overconcentration of uses is defined as creating (or further extending) a continuous frontage of two or more non-A1 units.

- Where a loss of A1 use is proposed, A2-A4, or D2 uses will be considered more favourably than other uses
- 4.4 Comments at the Regulation 18 Development Management Plan consultation included:
- Concern about the lack of retail diversity in Redhill
 - Importance of a diverse High Street
 - Concern about the number of vacant units
 - A1 frontage thresholds should be lowered
 - Importance of ensuring a mix of uses within town centres
 - Importance of maintaining town centre viability, vitality and vibrancy
- 4.5 The assessment below reality checks these figures to reflect changes of use (i.e. planning permissions granted since the Regulation 18 Development Management Plan town centre evidence paper was produced) and comments received at Regulation 18 stage.

Proposed Retail Frontage Thresholds

- 4.6 The Regulation 18 Development Management Plan town centre evidence paper recommends primary and secondary frontages. Section 4 of this report reality checks these proposed frontages and makes one recommendation – the removal of the secondary frontage for the Former Liquid & Envy Nightclub in Redhill. The table below compares the recommended frontage thresholds to the recommended frontages.

Table 5 Occupancy

Town Centre	Primary Frontage (%)	Threshold (%)	Secondary Frontage (%)	Threshold (%)
Banstead Village	71.1	65.0		
Horley	53.8	55.0		
Redhill	69.8	65.0	61.9	40.0
Reigate	71.3	70.0	58.8	55.0

Horley

- 4.7 The Regulation 18 Development Management Plan town centre evidence paper recognised that there was a need to reduce the A1 threshold as historically Horley town centre's frontage has had a high number of vacant units and had not met the A1 threshold. The proportion of A1 retail units had fallen from 62% in 2006 to 54% in 2016.
- 4.8 The Regulation 18 Development Management Plan town centre evidence paper recommended that a retail frontage threshold should be introduced which is lower than the 2005 Borough Local Plan threshold but is aspirational.

It was felt that there should not be any further reduction to the retail provision in Horley unless marketing evidence demonstrates that there is no demand for the unit, as Horley town centre does not have a retail core (instead the retail units are spread through the frontages) and it was felt that the loss of further retail units would affect the performance of the town centre.

- 4.9 The Retail Needs Assessment however also identified the need to improve the food and drink representation within Horley as the current provision is poor with limited representation from national brands. It was therefore recommended that changes of use to A3 should be permitted – even where it would result in the A1 frontage falling below the A1 retail threshold – providing that it will not bring about an overconcentration¹⁰ of such uses. It was felt that this would provide flexibility to expand and improve the A3 offer but in a managed way.
- 4.10 Within the last twelve months there have been minimal changes to the retail provision within Horley; it is therefore recommended that this approach is carried forward in the DMP.

Redhill

Primary Frontage

- 4.11 The Regulation 18 Development Management Plan town centre evidence paper recognised that there was a need to reduce the A1 primary threshold as historically Redhill's primary frontage has had a high number of vacant units and has not met the A1 threshold.
- 4.12 The Regulation 18 Development Management Plan town centre evidence paper recognised that the Retail Needs Assessment identified the need to improve the evening economy and food and drink provision. In line with the approach for Horley, it was recommended that changes of use to A3 should be permitted – even where it would result in the A1 frontage falling below the A1 retail threshold – providing that it will not bring about an overconcentration of such uses in the vicinity.
- 4.13 In terms of the A1 occupancy threshold, it was recognised that there was a need to improve the offer within the town centre. It was therefore recommended that the A1 threshold should be reduced to slightly below the current retail frontage as this would allow for changes of use which would improve the town centre offer but still retain the retail core within the primary frontage.

¹⁰ Overconcentration is defined as creating (or further extending) a continuous frontage of two or more non-A1 units.

- 4.14 Given that within the last twelve months there have been minimal changes to the retail provision within Redhill; it is recommended that the approach outlined in the Regulation 18 Development Management Plan town centre evidence paper is carried forward.

Secondary Frontage

- 4.15 At the time of preparing the Regulation 18 Development Management Plan town centre evidence paper, the A1 occupancy of the secondary frontage was 46%. It was therefore recommended that a threshold of 40% should be introduced as this would keep some retail use but allow for changes of use to other uses.
- 4.16 Since the Regulation 18 evidence paper was produced a number of occupiers have left the secondary frontage, the A1 occupancy level has therefore increased to 62% as 75% of the units which have been vacated were non-A1.
- 4.17 It is recommended that the 40% threshold is carried forward as once the units are reoccupied the proportion will fall again. A 40% threshold will keep approximately the same amount of retail provision as is currently present but allow it to be supplemented with other uses.

Banstead Village

- 4.18 The Regulation 18 Development Management Plan town centre evidence paper recognised that there was a need to reduce the A1 threshold as historically Banstead Village's frontage has not met the A1 threshold and the proportion of A1 retail had fallen from 75% in 2006 to 73% in 2016. The proportion has since fallen to 71%.
- 4.19 It was recommended that the frontage threshold should be reduced to 65% as this will allow for some changes of use which complement the A1 retail core (i.e. food and drink uses).
- 4.20 Unlike Horley & Redhill, it is not proposed that in the event of a proposal for A3 resulting in the frontage falling below the recommended frontage standard that the unit should be permitted providing that there is no overconcentration of such uses. because the Retail Needs Assessment identified that the centre already has a good proportion of food and drink uses.
- 4.21 Within the last twelve months there have been minimal changes to the retail provision within Banstead Village; it is therefore recommended that this approach is carried forward

Reigate

Primary Frontage

- 4.22 The Regulation 18 Development Management Plan town centre evidence paper recognised that there was a need to reduce the primary threshold as the town centre had failed to meet the target over the last ten years.
- 4.23 The Regulation 18 Development Management Plan town centre evidence paper recommended introducing a threshold which is approximately similar to current provision (as the Retail Needs Assessment identified good provision within the town centre) but which allows for some small changes of use to improve the offer within the town centre.
- 4.24 Unlike Horley & Redhill, it is not proposed that in the event of a proposal for A3 resulting in the frontage falling below the recommended frontage standard that the unit should be permitted providing that there is no overconcentration of such uses. This is because the Retail Needs Assessment identified a good proportion of food and drink uses.
- 4.25 Within the last twelve months there have been minimal changes to the retail provision within Reigate's primary frontage; it is therefore recommended that this approach is carried forward.

Secondary Frontage

- 4.26 The proposed secondary frontage within Reigate is a new frontage that has not been previously monitored as part of the town centre monitor¹¹.
- 4.27 The Regulation 18 Development Management Plan town centre evidence paper proposed a threshold of 55%. This threshold was introduced as it is approximately similar to current provision but allowed for some flexibility as the NPPF definition says that secondary frontages should allow for wider uses. The analysis in table 5 shows that this approach is still valid.
- 4.28 No changes are therefore proposed to the town centre primary and secondary frontage thresholds.

¹¹ For a time parts were monitored as part of the Area for Small Business Monitor

5. Conclusions and Recommendations

- 5.1 This paper has reviewed the town centre frontages, primary shopping areas and frontage thresholds.

Town Centre Frontages and Primary Shopping Areas

- 5.2 This evidence paper recommends that the primary frontages recommended in the Regulation 18 Development Management Plan town centre evidence paper should be carried forward.
- 5.3 In terms of secondary retail frontage, this paper recommends that there should not be any changes to the secondary frontage outlined in the Regulation 18 Development Management Plan town centre evidence paper for Reigate, however, recommends that the secondary frontage should be amended in Redhill to exclude the Former Liquid & Envy Nightclub.
- 5.4 In terms of primary shopping area, this paper recommends that the primary shopping areas for Redhill and Reigate should be expanded to include the secondary shopping frontage. This will make it in line with the NPPF.
- 5.5 The recommended proposed frontages and primary retail area are detailed below.

Figure 15 Banstead Village

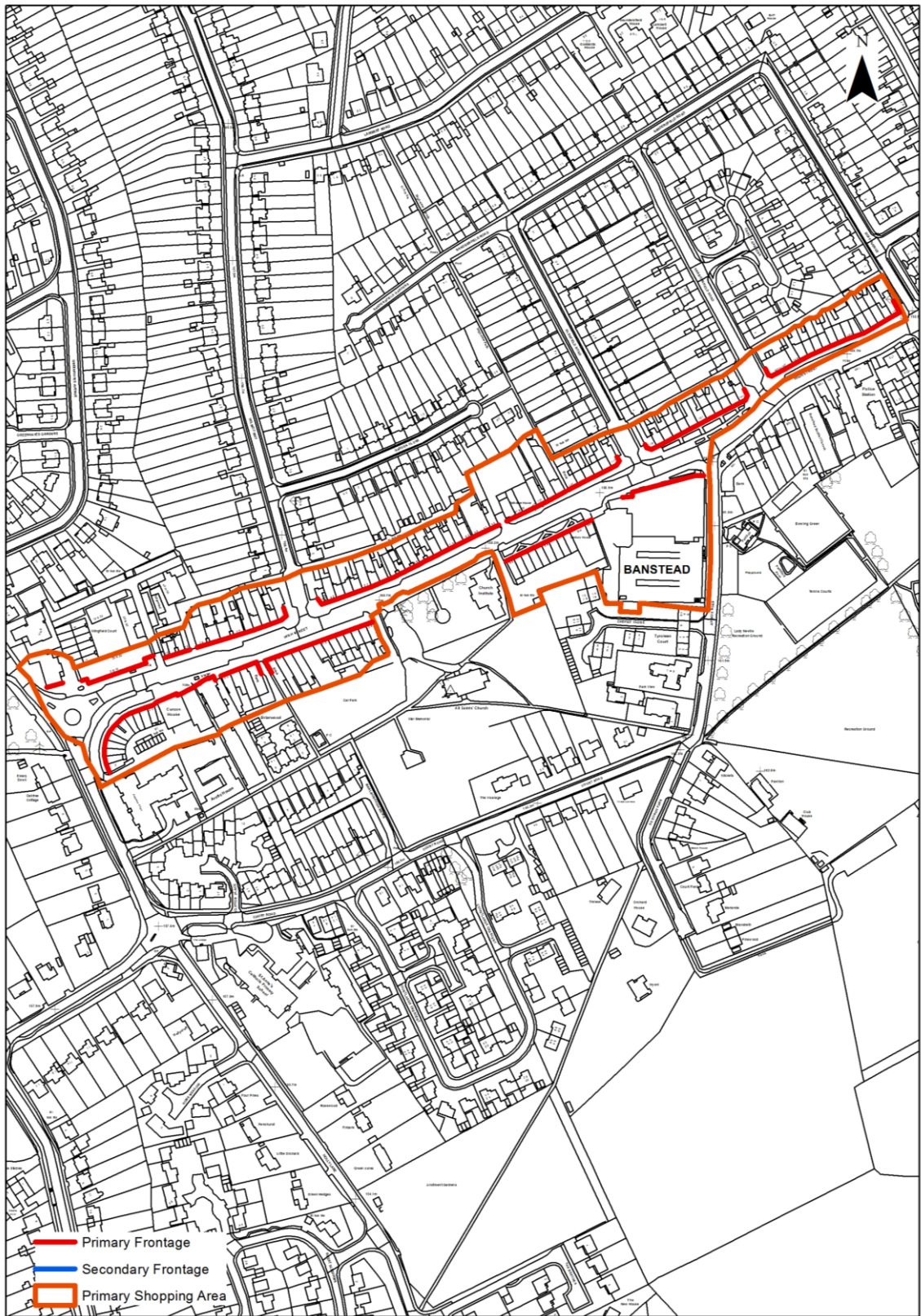


Figure 16 Horley

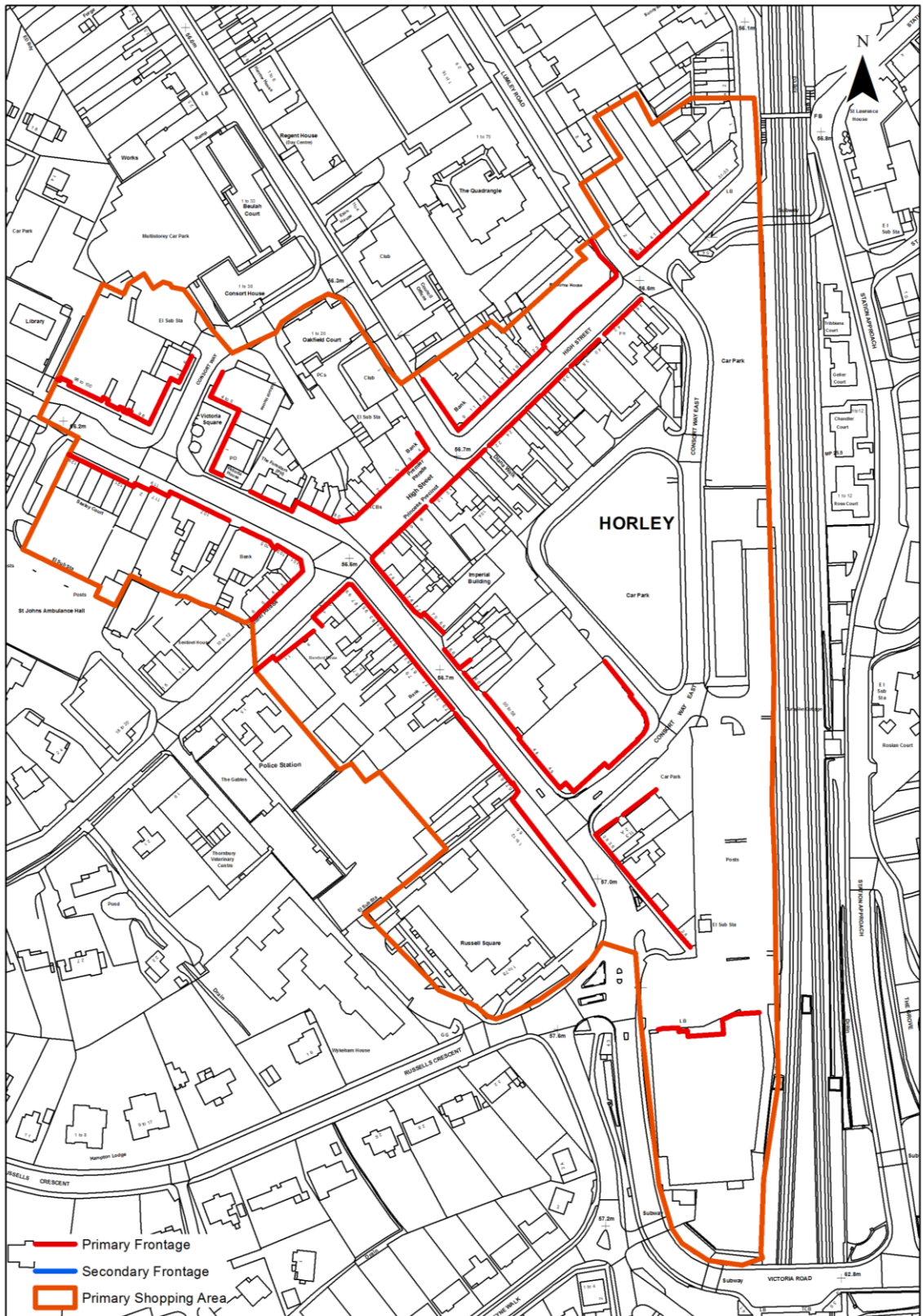


Figure 17 Redhill

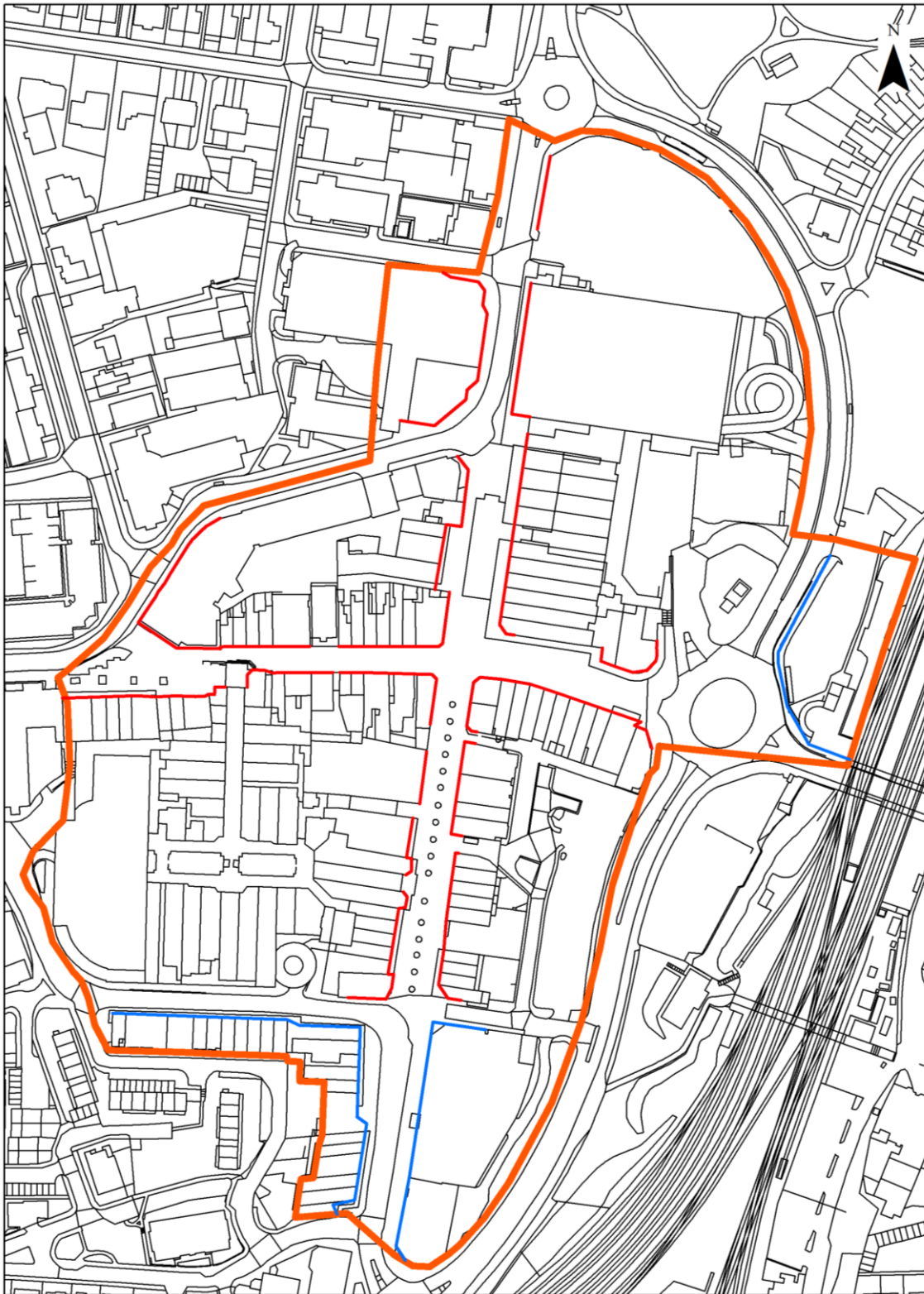
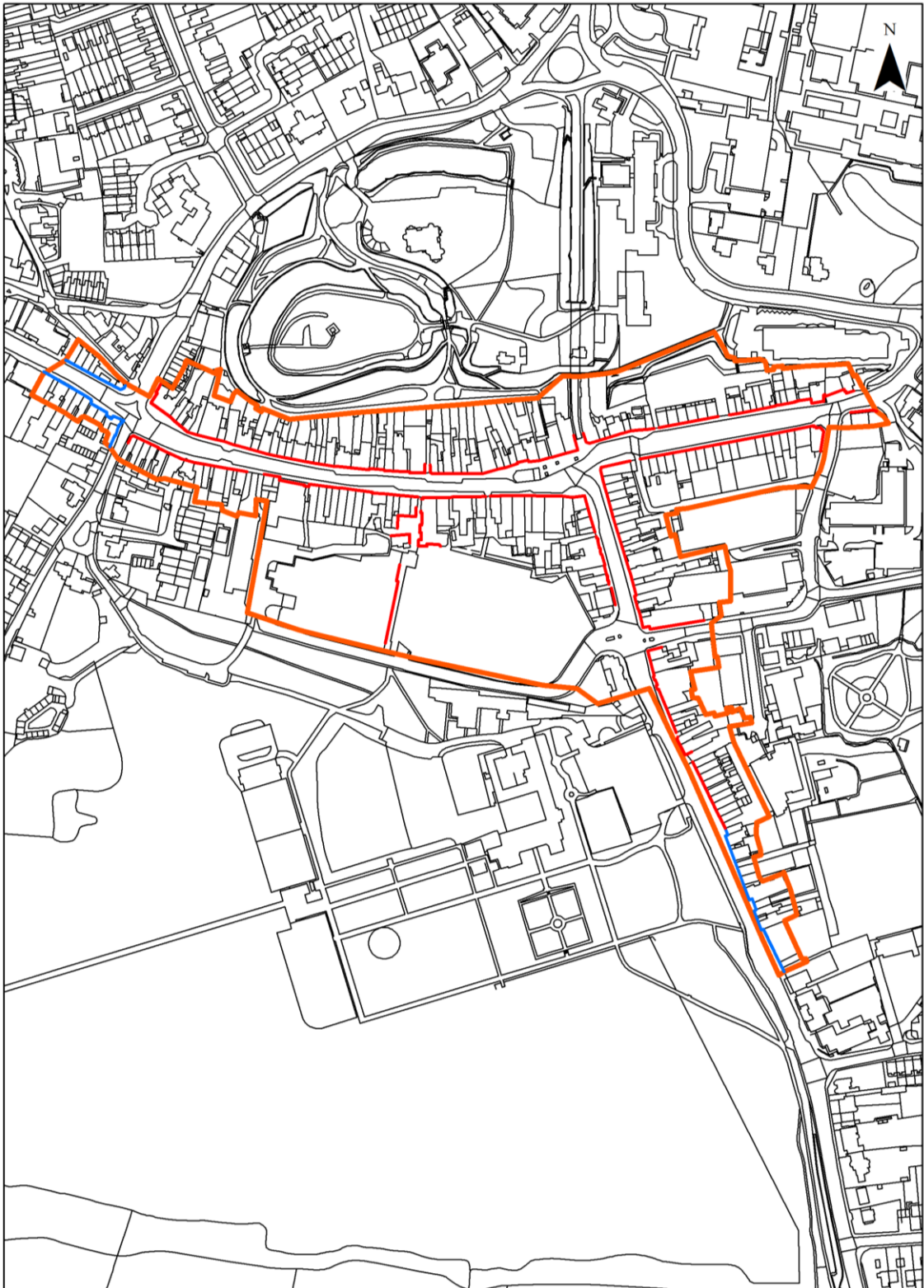


Figure 18 Reigate



Frontage Thresholds

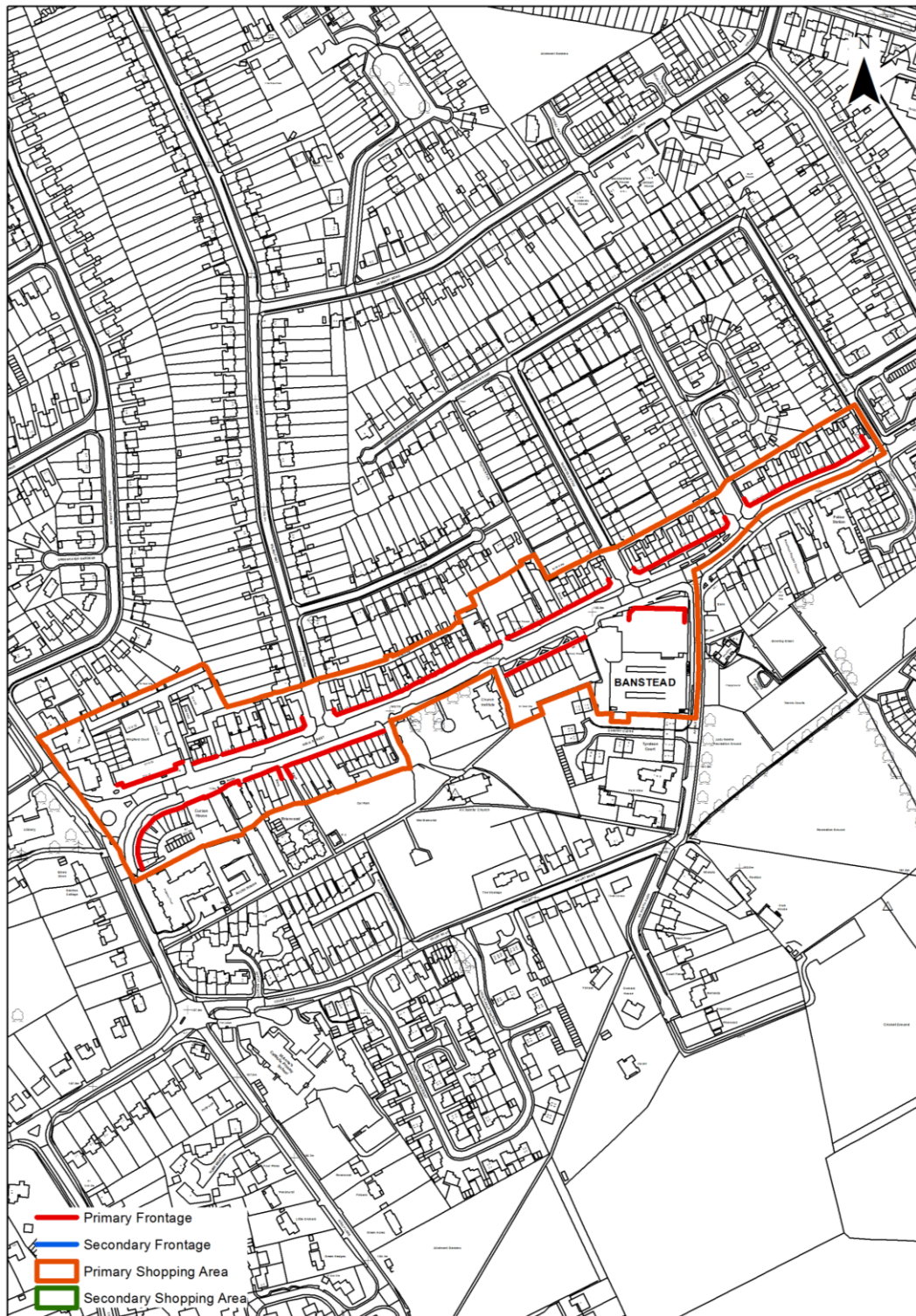
- 5.6 This paper recognises that there have been very few changes to the town centres retail provision since the Regulation 18 Development Management Plan town centre evidence paper was prepared and therefore recommends that the proposed frontage thresholds should be carried forward.
- 5.7 The recommended frontage thresholds are therefore:

Figure 19 Proposed Retail Frontages

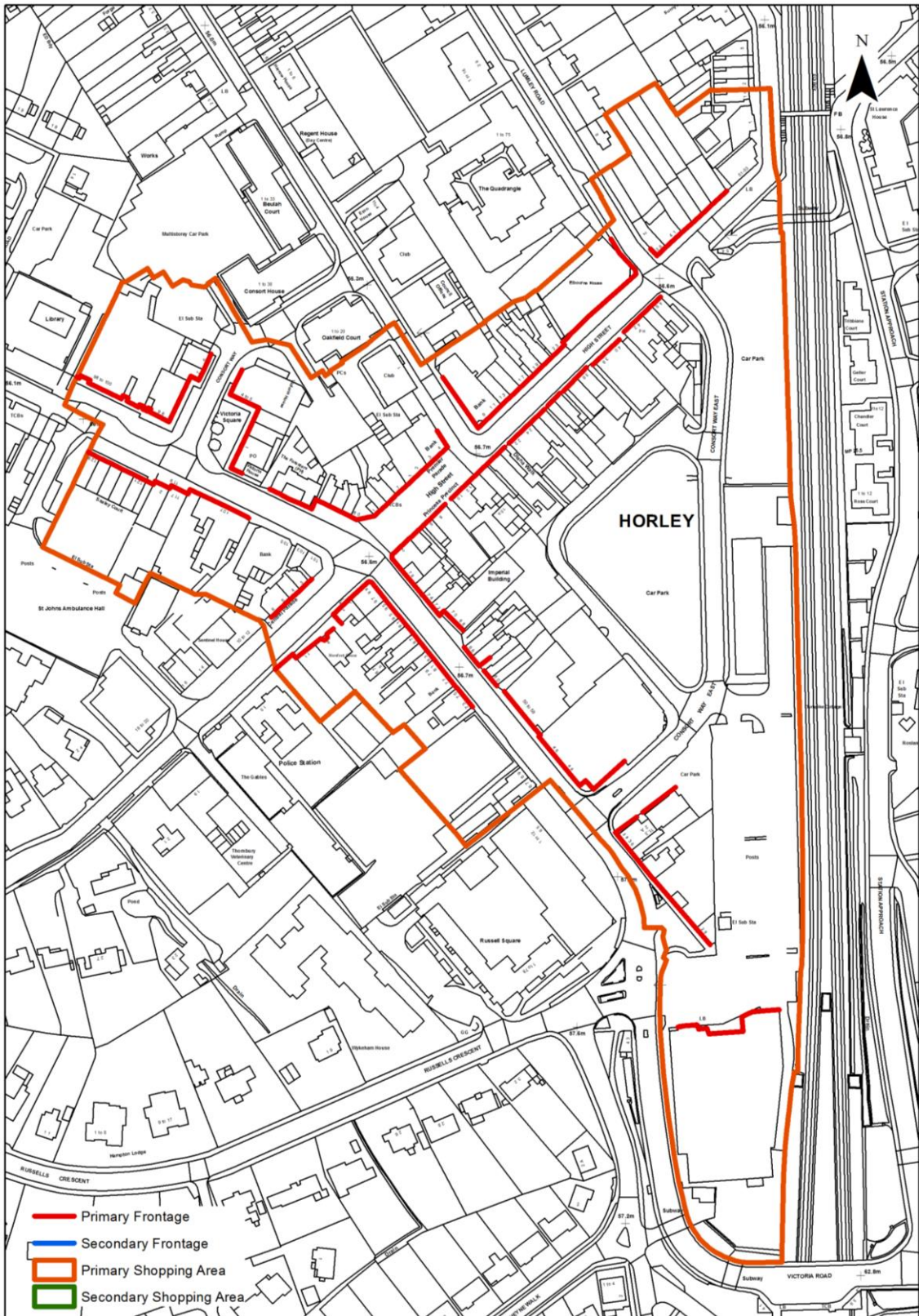
Town Centre	Primary Frontage	Secondary Frontage
Banstead Village	65%	
Horley	55%	
Redhill	65%	40%
Reigate	70%	55%

Appendix 1: 2005 Borough Local Plan Town Centre Frontages and Primary Shopping Areas

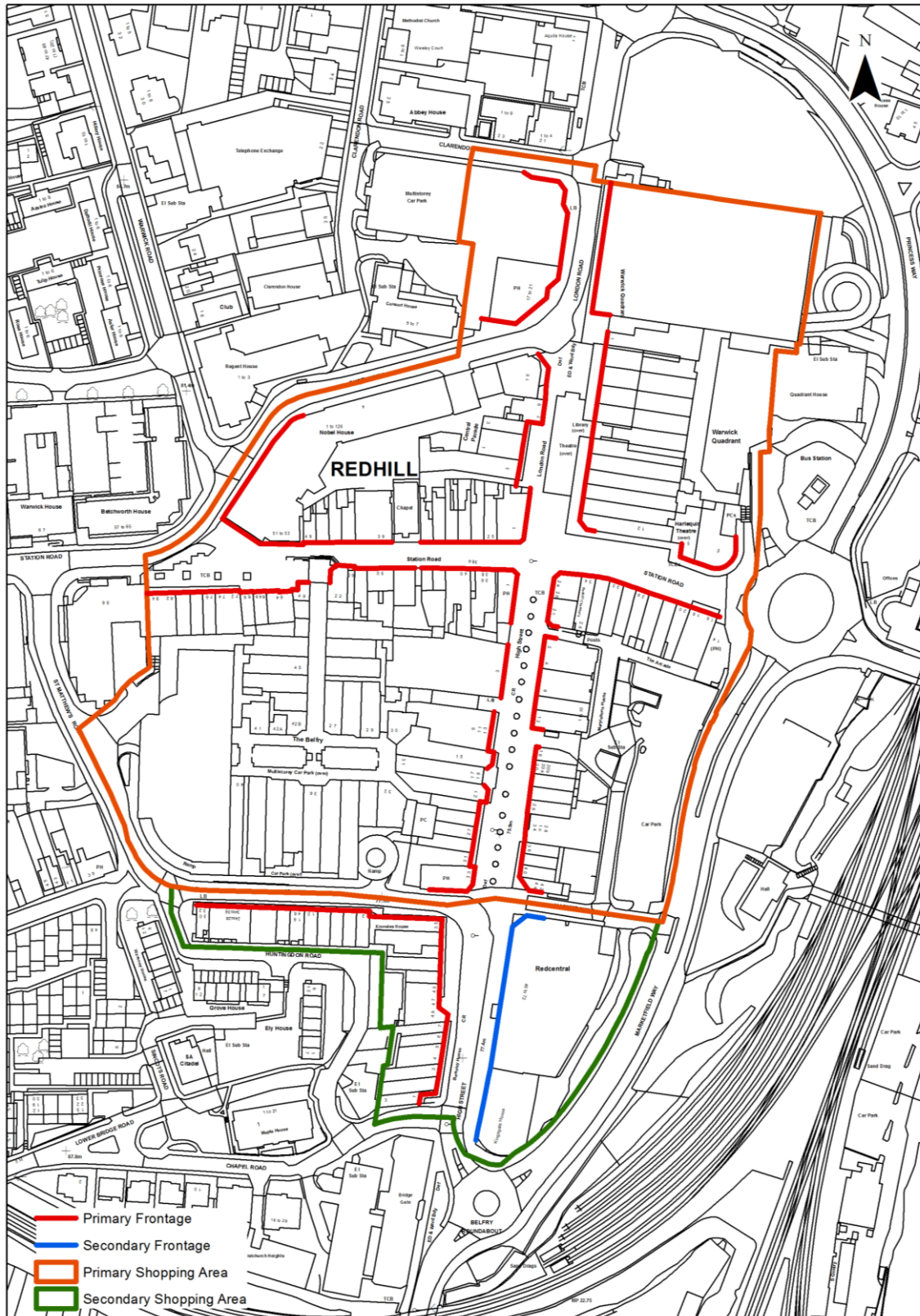
Banstead Village



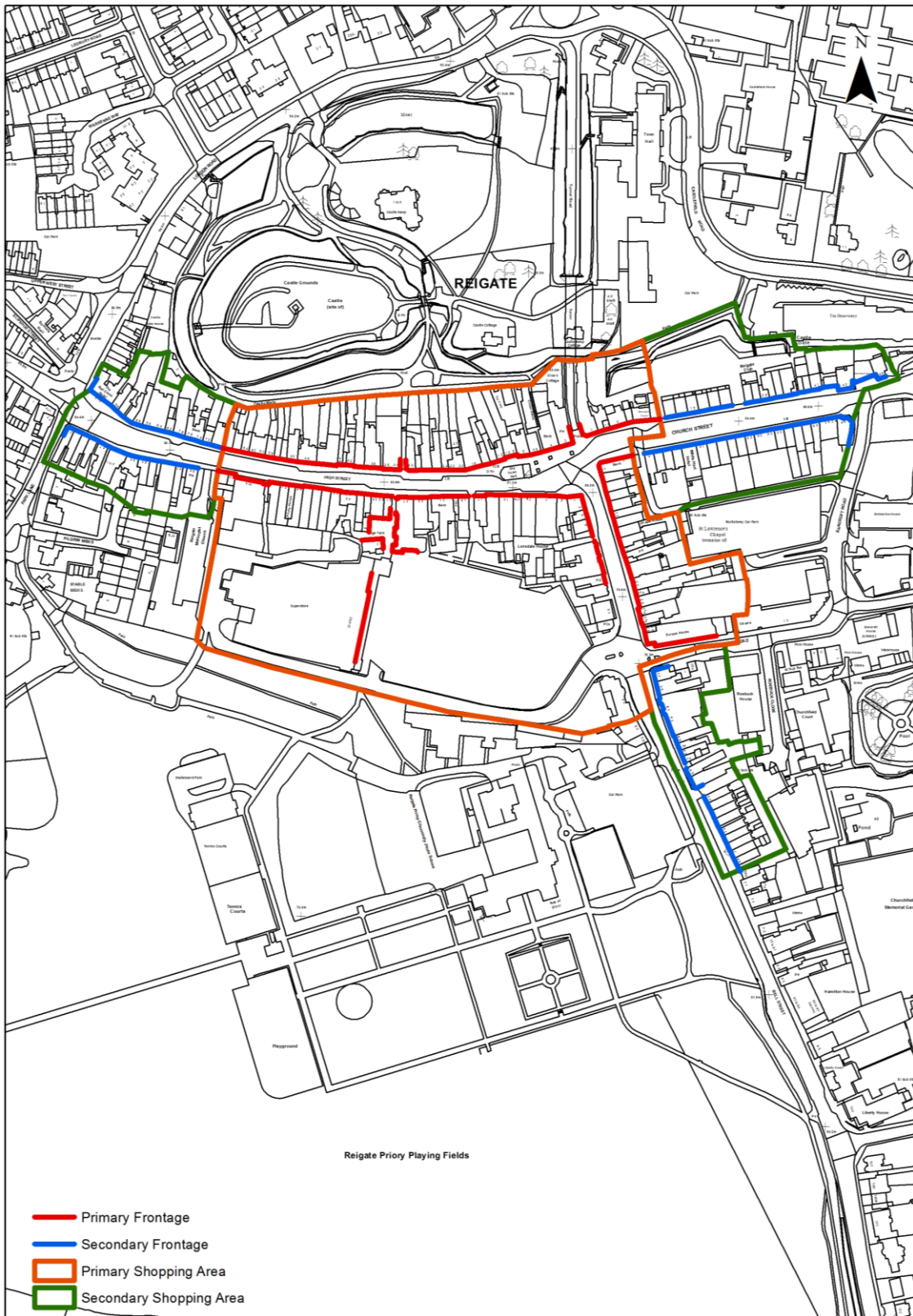
Horley



Redhill



Reigate

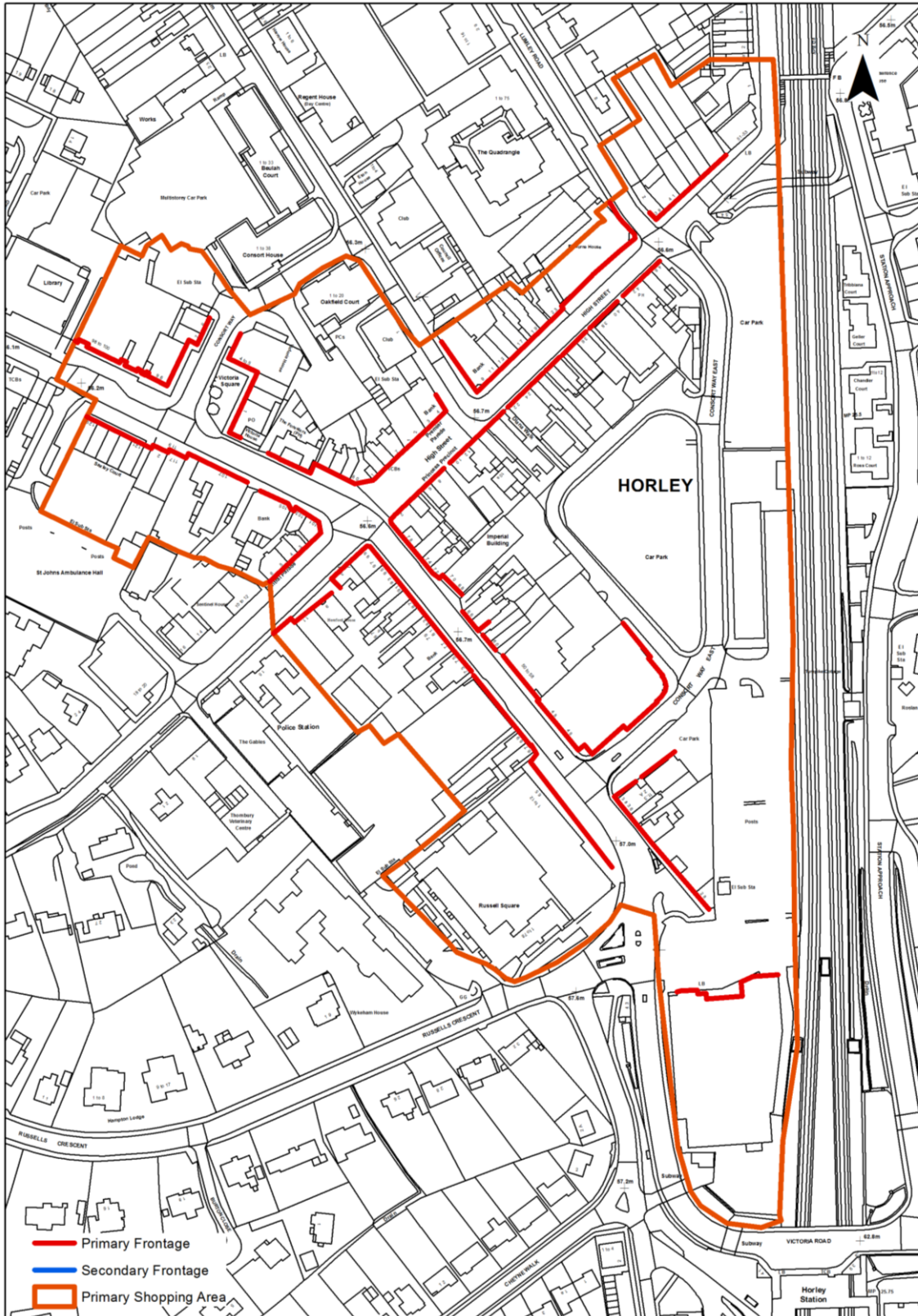


Appendix 2: Regulation 18 Development Management Plan Town Centre Frontages and Shopping Areas

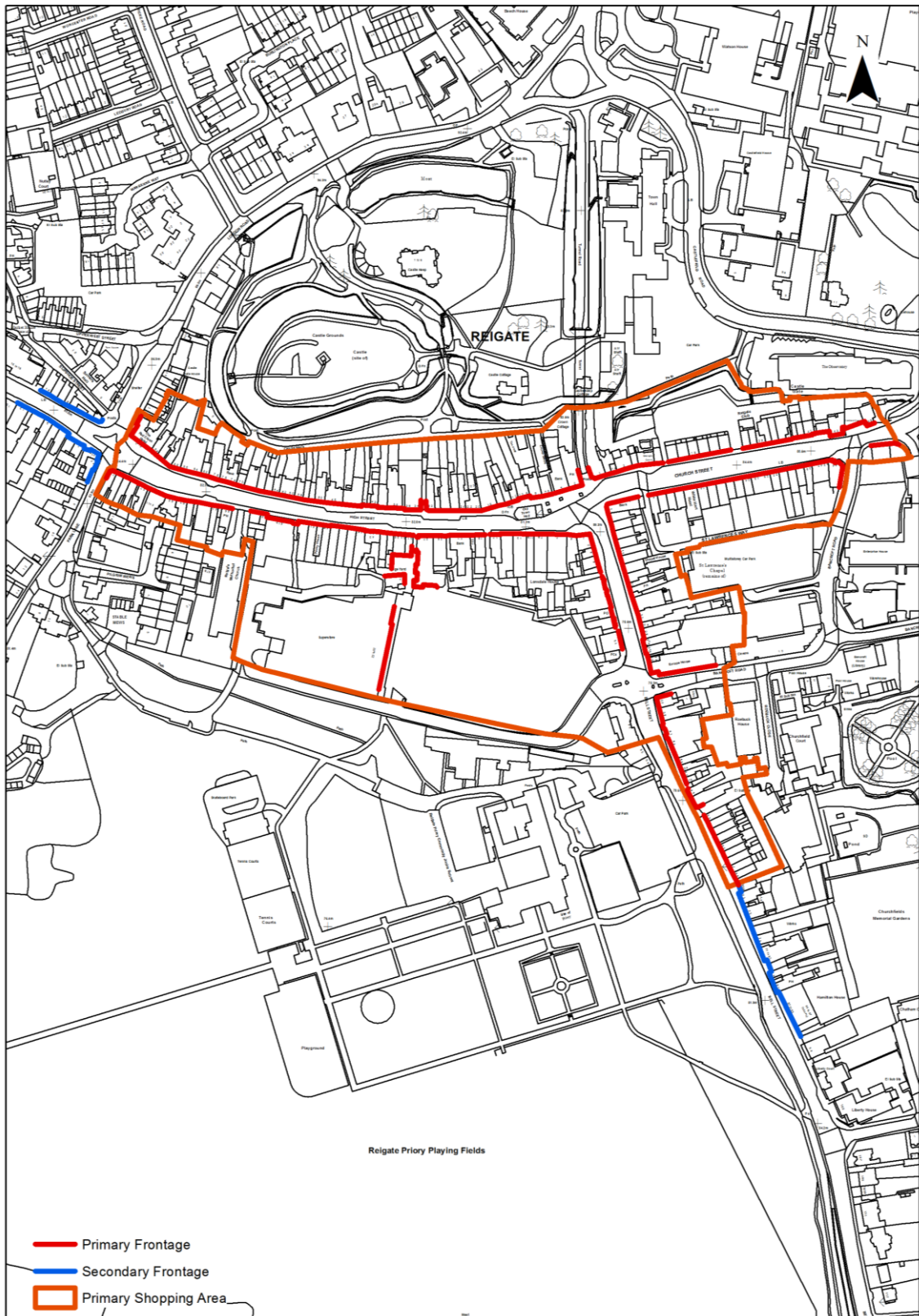
Banstead Village



Horley



Reigate



Redhill

