# Development Management Plan (Regulation 18 stage)

## Town Centres Review, Designations & Policy

June 2016

Reigate & Banstead
BOROUGH COUNCIL
Banstead | Horley | Redhill | Reigate

## Contents

# 1. Introduction

1.1. Reigate & Banstead Borough Council is currently preparing the Development Management Plan (DMP) as part of the new Local Plan. This background paper, prepared in support of the Regulation 18 consultation document, draws together the findings of site visits, town centre monitors and the Retail Needs Assessment[1] to:

- recommend town centre boundaries, primary shopping areas, primary frontages and secondary frontages
- recommend a retail impact assessment threshold
- suggest policies to manage the vitality and viability of town centres

## Policy Context

### National Planning Policy Framework (NPPF)

1.2 The 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.

1.3 The NPPF defines main 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)*

1.4 Paragraph 26 of the NPPF states that when assessing applications for retail, leisure and office development that are not within an existing centre and not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate locally set threshold, or exceeds 2,500sqm in the absence of a local floorspace threshold. Impact assessments should include an assessment of:

- The impact of the proposal on existing, committed and planned public and private investment in the centre or centres in the catchment area of the proposal; and
- The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made.

[1] Conducted by Peter Brett Associates March 2016
[2] http://planningguidance.communities.gov.uk/blog/policy/

## National Planning Practice Guidance (NPPG)

1.5 NPPG[3] advises local planning authorities to plan positively to support town centres to generate local employment; promote beneficial competition within and between town centres; and create attractive, diverse places where people want to live, visit and work.

1.6 In order to assess the viability and vitality of town centres, NPPG advises 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; and
- Environmental quality

1.7 NPPG highlights the importance of a "town centre first" approach but recognises that it may not be possible to accommodate all forecasted needs within town centres due to physical or other constraints. In these circumstances, NPPG says that planning authorities should plan positively to identify the most appropriate alternative strategy having regard to the sequential and impact tests.

## Borough Local Plan 2005

1.8 With the exception of Horley, the Borough Local Plan[4] does not define town centre boundaries. Instead, it relies on an amalgam of different economic designations to manage development taking place in and around the town centres. These include areas for small businesses, retail warehousing areas, town centre use areas, primary and secondary shopping areas and retail frontages.

1.9 The 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 frontages are subsequently defined alphabetically and changes of use are measured against the specific alphabetised frontage.

1.10 Policy Sh7 seeks to maintain a minimum of 80% occupancy of Class A1 retail frontage in Primary Shopping Areas in both Reigate and Redhill town centres; 75% in Banstead; and 70% in Horley.

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[3] http://planningguidance.communities.gov.uk/blog/guidance/ensuring-the-vitality-of-town-centres/ensuring-the-vitality-of-town-centres-guidance/
[4] https://www.reigate-banstead.gov.uk/info/20271/borough_local_plan_and_proposals_map

1.11 Within Redhill and Reigate's secondary shopping areas policy Sh7 seeks to maintain a minimum of 66% A1 occupancy of defined retail frontages.

### Core Strategy

1.12 The Council's adopted Core Strategy[5] supports the management, growth and role of the Borough's retail centres. Policy CS7 sets out the retail hierarchy:

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

### Permitted Development

1.13 Recent changes to permitted development rights enable developers to change shops to other uses (restaurants, residential etc.) and offices to residential, requiring only prior approval permission from Local Authorities. Prior approval requirements are less stringent than planning applications but in most cases still require the consideration of traffic impact and consideration of the impact of the change on the sustainability of centres. This makes it easier for developers to change uses, and means that it is more difficult for the Council to control changes of use through policy.

## Relevant Evidence

### Retail and Leisure Needs Assessment

1.14 Peter Brett Associates were instructed in February 2016 by Reigate & Banstead Borough Council to undertake a Retail and Leisure Needs Assessment[6] to inform future planning policies for the borough. 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

1.15 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 also be recognised when planning for retail floorspace.

1.16 <u>For Reigate:</u>

- Comparison floorspace need of 2,500sqm by 2027, increasing to 4,000sqm by 2032. This is expected to be met through a combination of minor extensions and improved performance of existing floorspace.

[5] www.reigate-banstead.gov.uk/corestrategy
[6] www.reigate-banstead.gov.uk/dmp

- 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

1.17 For Redhill:

- The comparison goods need is estimated at 7,500sqm by 2027, increasing to about 13,100sqm net by 2032. 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.
- 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.

1.18 For Horley:

- Comparison goods need for approx. 800sqm by 2027, increasing to 1,500sqm by 2032. This is expected to be accommodated as part of mixed use developments, as well as minor extensions to existing floorspace.

1.19 For Banstead:

- Comparison floorspace need of about 900sqm by 2027, increasing to about 1,800sqm by 2032. It was felt that this could be met through improved performance of existing stores and small scale extensions or new provision.

## Town Centre and Local Centre Monitoring

1.20 The Council monitors the town and local centres quarterly. Occupiers and changes of use are recorded.

1.21 Annually, the Council produces town and local centre monitors[7]. They include:

- Analysis of use classes and retail offer
- Vacancy and new occupier information
- Development proposals and changes of use.

[7] http://www.reigate-banstead.gov.uk/info/20280/plan_monitoring/33/town_and_local_centre_monitors

# 2. Characterising our town centres

2.1 The borough's town centres vary in character and therefore require different policies. The following section gives an overview of each town centre.

## Banstead Village

2.2 Banstead Village is in the north of the borough and is the smallest town centre in the borough. 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

2.3 The town centre's primary role is serving the needs of the local population. Services (such as banking and hairdressing) occupy the greatest proportion of units and convenience retail the greatest proportion of floorspace. The convenience 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 retailers including Banstead Fruiterers, Coughlan's Bakery and Edibles Delicatessen.

2.4 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.

2.5 Whilst there are no leisure (D2) facilities as such, there are a number of food and drink premises. These include national retailers such as Pizza Express, Prezzo and Zizzi's; and independent retailers including Banstead Tandoori, Ciao Italia and Royal China. There are also a small selection of takeaways, including Gold Medal House and Papa John's. The nearest cinema and theatre are in Epsom.

**Table 1 Diversity of Uses in Banstead Town Centre**

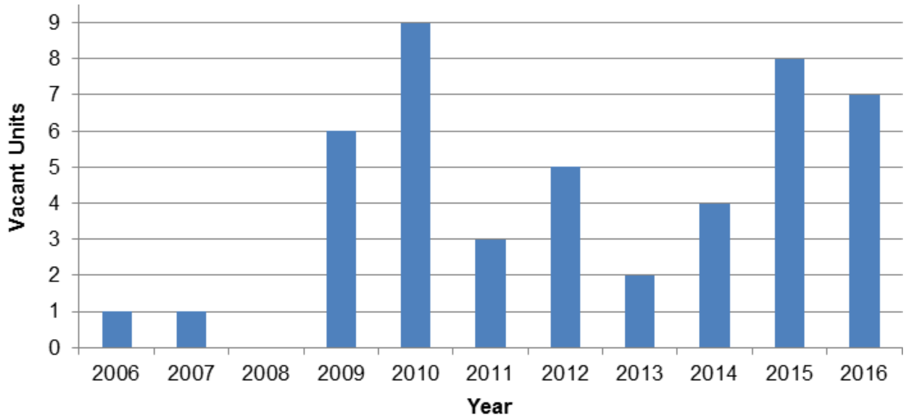
| | Units (%) | Net floorspace (%) |
|---|---|---|
| Comparison | 32.5% | 22.7% |
| Convenience | 11.1% | 38.3% |
| Service | 35.9% | 20.5% |
| Food & Drink Leisure | 13.7% | 13.3% |
| Non-Retail | 0.9% | 1.6% |
| Vacant | 6.0% | 3.7% |

### Vacancies

2.6 Banstead town centre has a lower vacancy rate than the national average (6% compared to 12%); the units are relatively small (occupying only 4% of the total floorspace); and are dispersed relatively evenly.

2.7 Figure 1 shows that vacancy levels started to recover since the recession (between 2011 and 2014) although more recently vacancies have increased to near-recession levels.

**Figure 1 Banstead Town Centre Vacancies**




## Horley

2.8 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 some 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.

2.9 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. Environmental quality across the rest of the town centre is however limited with narrow and poorly maintained pavements.

### Diversity of uses

2.10 Horley town centre performs a convenience and service role for the local population: table 2 shows that services occupy the greatest proportion of units (35%) and convenience occupies the greatest proportion of floorspace (37%). The town centre also benefits from a weekly farmers market offering a butchers, greengrocers and homeware.

**Table 2 Diversity of Uses in Horley Town Centre**

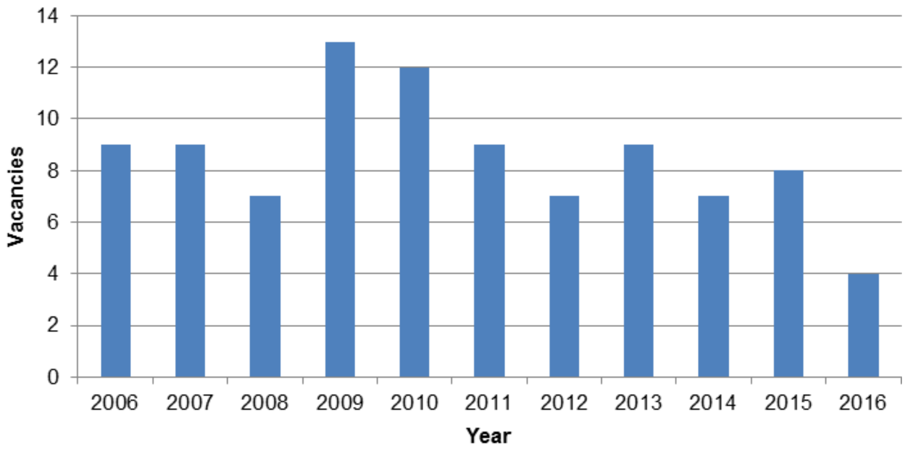
| | Units (%) | Net floorspace (%) |
|---|---|---|
| Comparison | 25.7% | 30.3% |
| Convenience | 12.4% | 36.7% |
| Service | 35.2% | 18.6% |
| Food & Drink Leisure | 19.0% | 12.0% |
| Non-Retail | 3.8% | 1.3% |
| Vacant | 3.8% | 1.0% |

2.11 Whilst there is a relatively good mix of uses within the town centre, the quality/ offer is limited and is directed towards the lower/ middle end of the market. Of the Experian GOAD 31 key attractors, the town centre only has one, Boots.

### Vacancies

2.12 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. Vacancies have fallen from a peak of 13 in 2009 to 4 in 2016.

**Figure 2 Horley Town Centre Vacancies**




## Reigate

2.13 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 shop fronts 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, however it is not pedestrianised. Priory Park to the south and Caste Grounds to the north provide large areas of green open space.

2.14 Much of the town centre falls within the conservation area which has resulted in the retention of 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 area. This has resulted in Reigate's retail offer being characterised by a high proportion of small 'boutique' and independent units.

### Diversity of uses

2.15 Reigate functions as a comparison, convenience and food and drink destination.

**Table 3 Diversity of uses in Reigate Town Centre**

| | Units (%) | Net floorspace (%) |
|---|---|---|
| Comparison | 44.3% | 33.4% |
| Convenience | 6.3% | 23.8% |
| Service | 27.6% | 16.6% |
| Food & Drink Leisure | 17.8% | 20.2% |
| Non-Retail | 1.1% | 0.0% |
| Vacant | 2.9% | 5.9% |

2.16 Despite a low Experian GOAD score (3); the comparison offer within the town centre is of a high quality and is oriented towards the middle/ luxury market. It features many national chains and independent, boutique and specialist retailers.

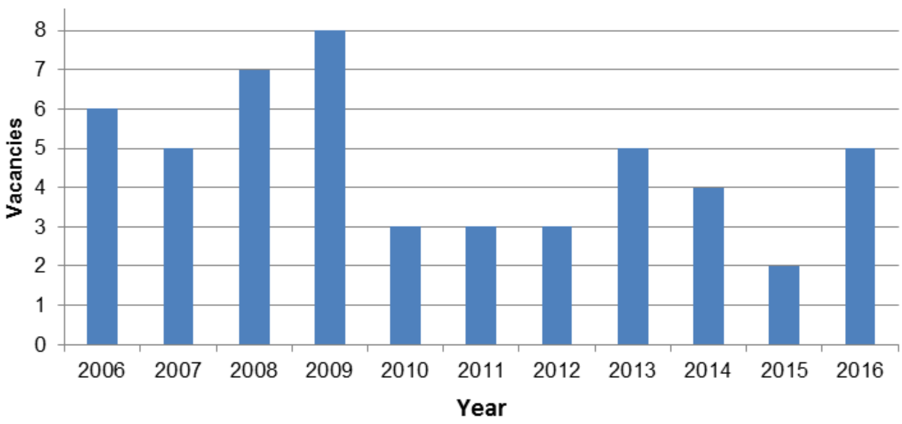
2.17 The convenience offer within the town centre is anchored by a large Morrison's supermarket which is complemented by a Marks & Spencer's Simply Food and a number of independent retailers such as Cullenders Delicatessen, Chalk Hills Bakery and Robert & Edwards Butchers. This is also supplemented by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

2.18 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 (for example, Giggling Squid and Little Tuscany) and national brands (for example, Café Rouge and Pizza Express). The centre also benefits from an Everyman Cinema, two private gyms and a yoga studio. Reigate Priory Bowling Club and Reigate Heath Golf Club lie within close proximity to the town centre.

## Vacancies

2.19 Reigate town centre has historically had a low vacancy rate. Despite a slight increase in the number of vacant units within the last twelve months (2 to 5[8]) the vacancy rate lies below the national average (3% compared to 12%). The vacant units are spread relatively evenly throughout the town centre without any clustering.

**Figure 3 Vacancies within Reigate Town Centre**




[8] 3 of these premises are either undergoing refurbishment or subject to live planning applications and – subject to approval – may be occupied shortly

## Redhill

2.20 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.

2.21 Major regeneration works have been planned for the town centre[9]. Works include the creation of a cinema, new retail and residential units and public realm improvements.

2.22 Just to the north of the town centre is Memorial Park, a local park which has recently been significantly upgraded and provides an attractive and valued area of green open space.

### Diversity of uses

2.23 Redhill performs a comparison, convenience and service role.

**Table 4 Diversity of uses in Redhill Town Centre**

| | Units (%) | Net floorspace (%) |
|---|---|---|
| Comparison | 36.7 | 51.6 |
| Convenience | 8.0 | 21.0 |
| Service | 28.4 | 12.4 |
| Food & Drink Leisure | 9.7 | 7.3 |
| Non-Retail | 3.4 | 1.0 |
| Vacant | 14.2 | 6.7 |

2.24 Redhill's comparison offer is limited and it 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 retailers, for example Clarks, Millets and Topshop, but these tend to occupy smaller premises and do not offer much choice.

2.25 The convenience offer is anchored by Sainsbury's supermarket which is currently undergoing redevelopment works. There are two specialist food stores (United Oriental Mini-Mart and Choice Halal Centre) and a small Co-Operative. Other convenience is limited and includes chemists and newsagents.

2.26 There is a poor provision of food & drink leisure facilities: there is limited representation from national operators, those present include Costa and Frankie & Benny's, and independent operators tend to cater to the lower end of the market, with operators including Café Ho Sete and Danny's Café. The town centre does however benefit from the Harlequin Theatre and Cinema.

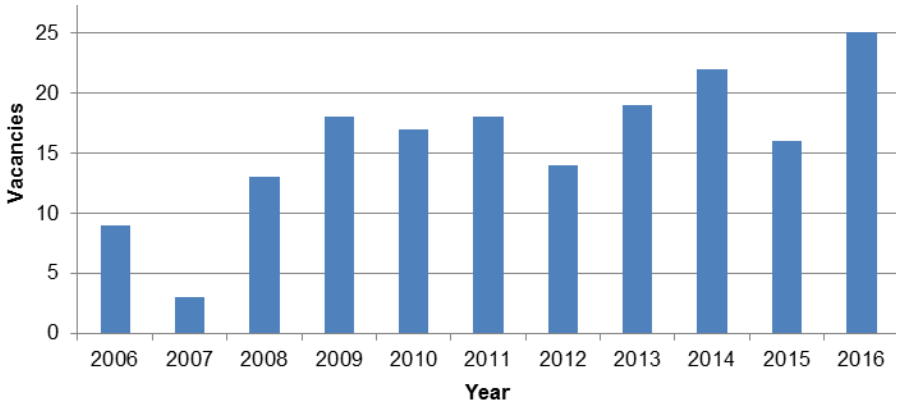
9 Detailed in the Redhill Area Action Plan and Council's regeneration webpages

## Vacancies

2.27 Redhill town centre has a vacancy rate of 14% which is slightly above the national average of 12%. The vacant units are dispersed throughout the town centre; however there is a slight concentration of vacant units on Cromwell Road where regeneration is planned.

2.28 Over the last couple of years the number of vacant units has increased and now stands above the recession levels.

**Figure 4 Vacancies within Redhill Town Centre**



# 3. Defining frontages, shopping areas and boundaries

## Introduction

3.1 With the exception of Horley, the Borough Local Plan does not define town centre boundaries. Instead, it relies on an amalgam of different economic designations to manage development taking place in and around the town centres. These include areas for small businesses, retail warehousing areas, primary and secondary shopping areas and retail frontages.

3.2 As above, for the purposes of retail planning, the NPPF sets out that local planning authorities should define the extent of town centre and primary shopping areas based on a clear definition of primary and secondary frontages.

3.3 Whilst the NPPF does not provide specific guidance on the drawing of town centre boundaries, primary shopping areas and frontages, definitions in Annex 2 give an indication of which uses should be considered:

- **Primary shopping area:** A defined area where retail development is concentrated, generally comprising the primary and those secondary frontages which are adjoining to the primary shopping frontage
- **Town centre:** Area defined on the local planning authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.
- **Primary frontages:** Includes 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.

3.4 The Borough Local Plan 2005 defines primary frontages for all town centres with secondary frontages for Redhill and Reigate only. The Council monitors uses within these frontages on a quarterly basis and produces a Town Centre monitor annually.

## Defining shopping frontages and primary shopping area

### Methodology

3.5 The NPPF suggests a sequential approach, starting with the definition of frontages and then working outwards to define the primary shopping area and town centre boundary.

3.6 The first step is therefore to determine the extent of primary and secondary shopping frontages. In order to do this, the following have been reviewed:

- existing evidence on the occupiers and mix of uses in each of the town centres (set out within the Town Centre monitor)
- planned and potential development opportunities in and adjacent to town centres (particularly for retail, leisure or business use)

3.7 In line with the NPPF, it is proposed to align the primary shopping area with the primary frontages, with secondary shopping areas sitting outside of – but adjacent to the primary shopping area.

3.8 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 centres.

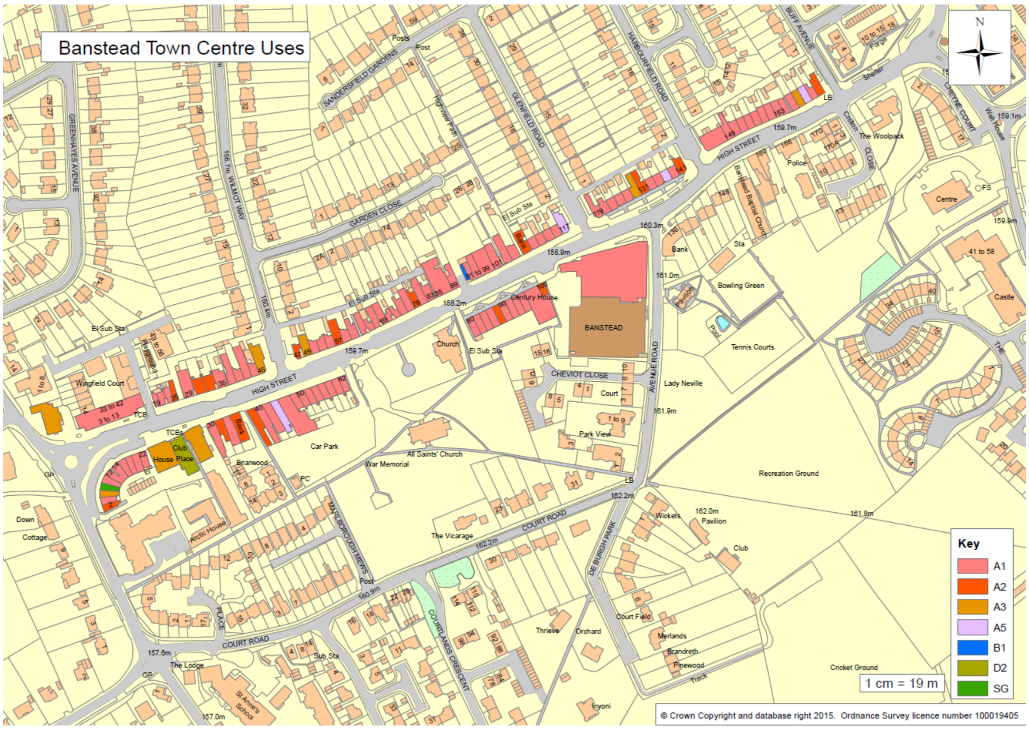
## Banstead

**Defining shopping frontages**

3.9 Primary: Analysis of the current use classes and occupiers (figure 5) indicates that there is strong representation from main A1 retail uses throughout the High Street. It is therefore proposed that the primary frontage covers all units between Bolters Lane and Buff Avenue on the northern side of the High Street. On the southern side, the large Waitrose store represents a demonstrable transition in the nature of the high street, with the mix of uses and continuity of the frontage become more varied to the east of Waitrose. It is therefore proposed that, on the southern side of the High Street, the primary shopping frontage includes all units between Bolters Lane and Avenue Road.

3.10 Secondary: As above, 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, church and police/fire station. Whilst the types of uses are consistent with the NPPF definition of a secondary frontage, the nature of the units means they do not read as a coherent frontage. Whilst this area may offer potential for redevelopment in the longer term, it is not recommended that this area is allocated as secondary frontage at this time.

## Figure 5 Current Town Centre Uses




## Figure 6 Proposed Frontages and Primary Shopping Area




1:1,150

## Horley

3.11 Primary: Analysis of the current uses and occupiers (figure 7) shows a wide mix of uses within the town centre. In particular it indicates that there is strong representation from main A1 retail uses throughout the town centre. It is proposed that the primary shopping frontage is extended along Victoria Road to include the land parcel at 71 Victoria Road (2 retail units are under construction) and Russells Square (4 newly developed retail units).

3.12 Secondary: The mix of uses in the parade including the Jack Fairman Public House (north of Waitrose) and on the northern side of Victoria Road (between the High Street and Library) is more varied and could warrant secondary frontage designation. However, as they are bookended by the towns two large supermarkets (both of which are vital to the retail offer in the town and which as per the NPPF definition retail definition ought to be included within the primary frontage) they are included in the primary frontage as it would not make sense to have secondary frontage in between.

**Figure 7 Current Town Centre Uses**

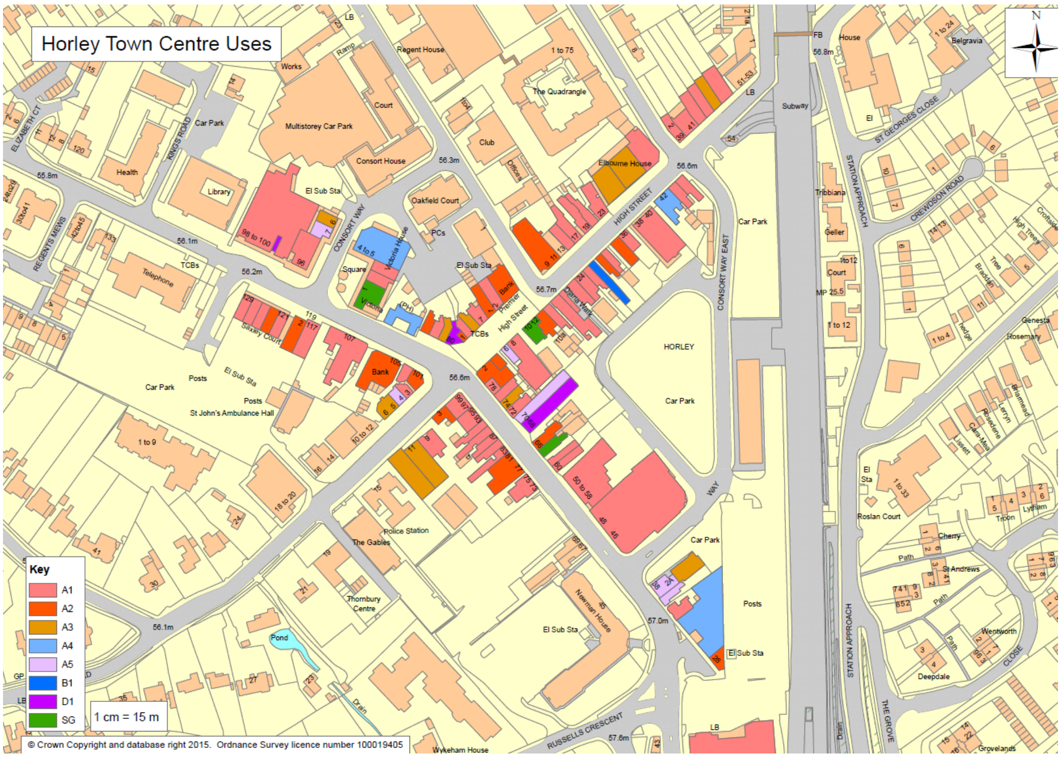
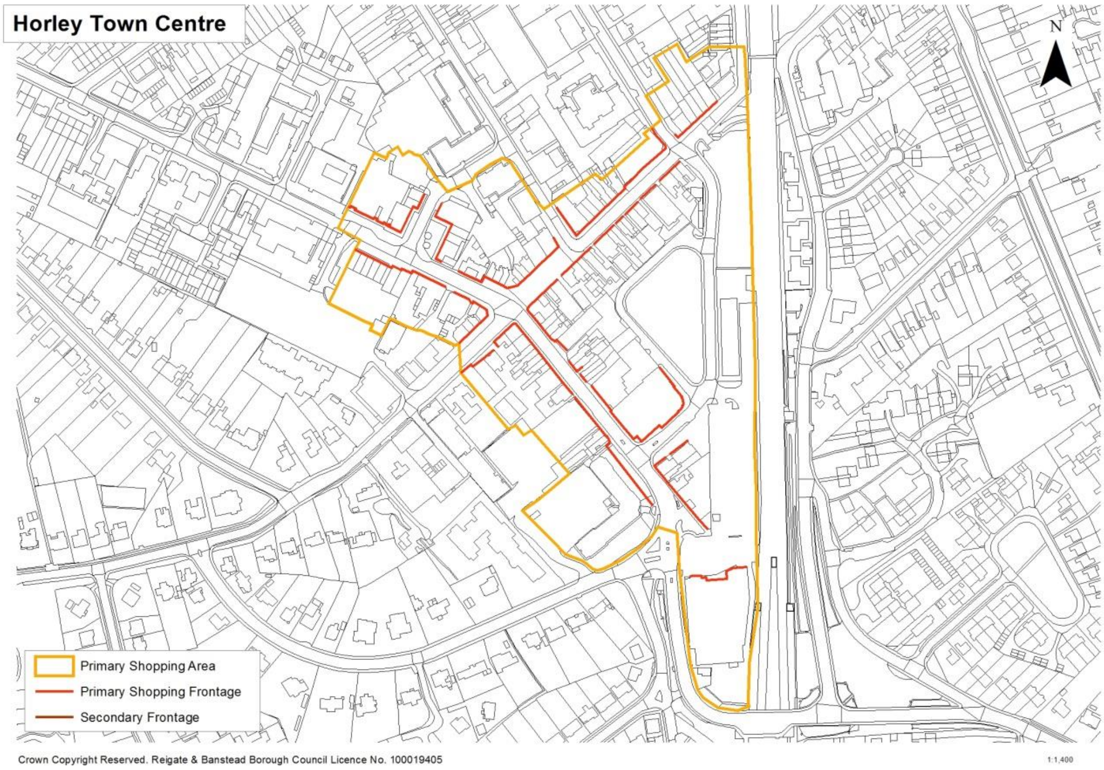


**Figure 8 Proposed Frontages and Primary Shopping Area**

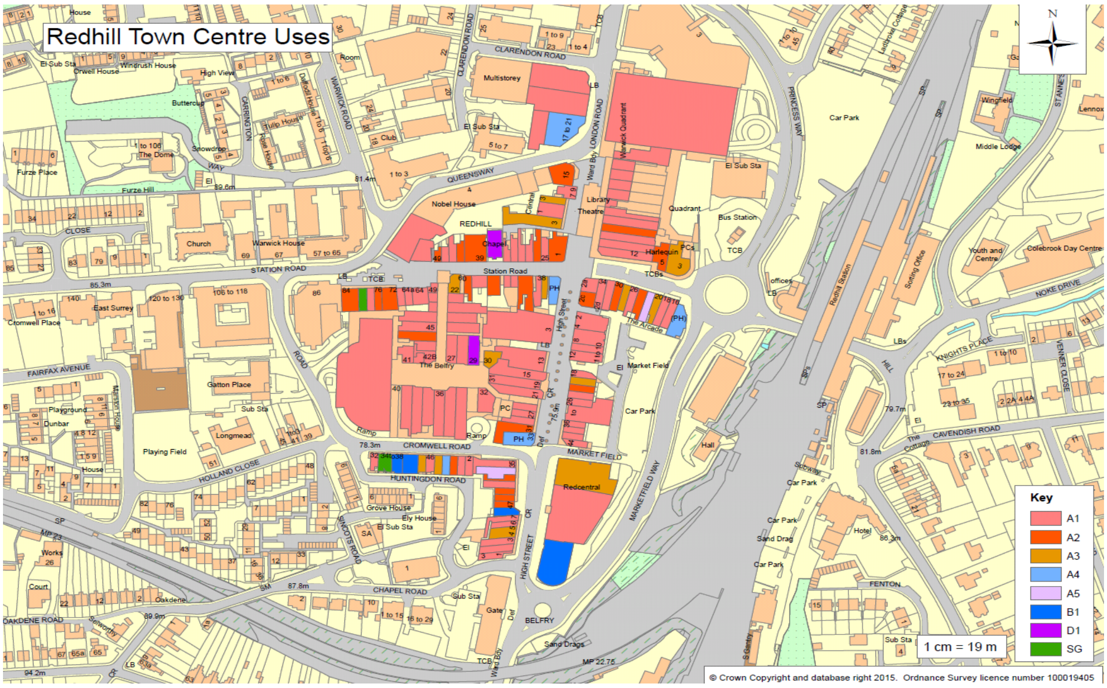



## Redhill

3.13 Primary: Analysis of the current use classes and occupiers indicates that there is strong representation from main A1 retail uses throughout the pedestrian area. It is therefore proposed that the primary frontage covers all units on Station Road between the Barclays and McDonalds; all units on London Road from Lloyds to Iceland and all units on High Street between Thomas Cook and the Tower Public House.

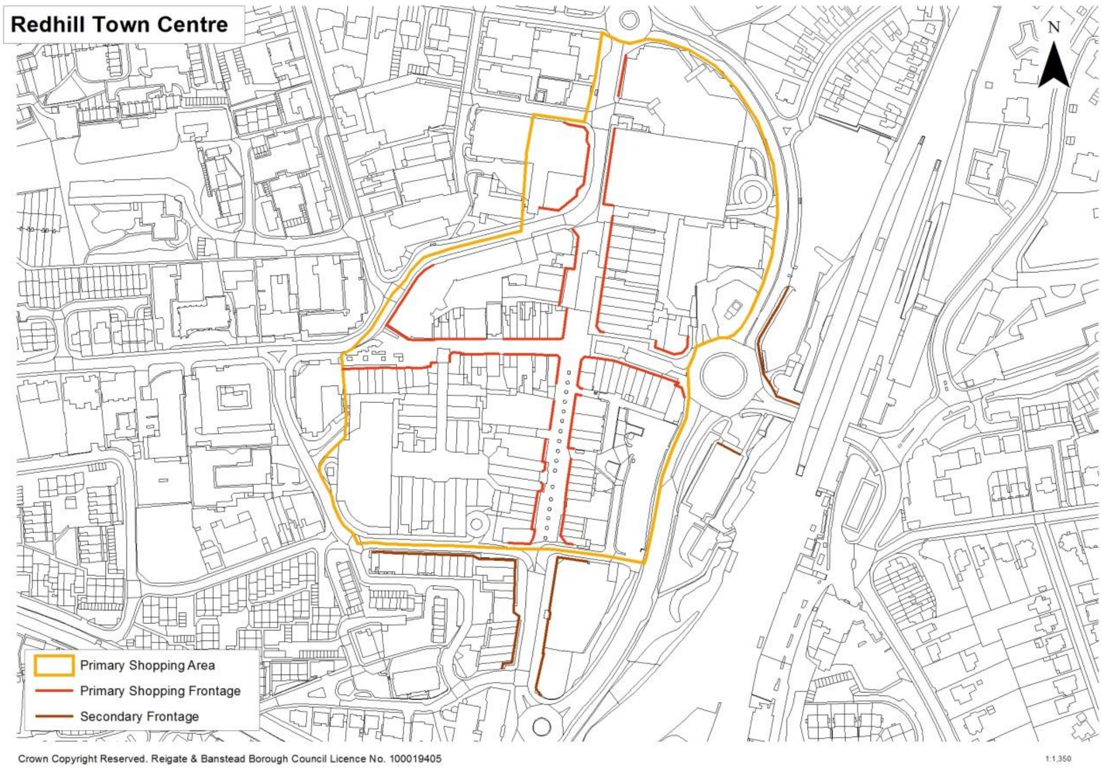
3.14 Secondary: The streets adjoining the primary frontage (namely between Gems Hair Salon and Eastern Euro Market on Cromwell Road; between Eastern Euro Market and the Bakery Furniture Shop on High Street; and on the southern side between Kingsgate and Frankie & Benny's) have a greater mix of uses. It is therefore proposed that these are designated as secondary frontages.

**Figure 9 Current Town Centre Uses**




3.15 Two sites to the east of the existing primary shopping area (Redhill Station and the former Liquid & Envy Night-club) have planning permission for retail use. Due to their relative separation from the primary shopping area, it is proposed that they are designated as secondary shopping frontages.

**Figure 10 Proposed Frontages and Primary Shopping Area**



## Reigate

3.16 Primary: Analysis of the current uses in Reigate town centre shows a large core within which there is a consistently high representation from A1 retail shop uses. This core includes both the primary and secondary frontages as defined in the Borough Local Plan 2005 and covers the units on Church Street, High Street (to the junction with West Street) and Bell Street (as far as the parade including nos. 53-69).

3.17 Secondary: The parade along West Street immediately abutting the High Street and the parade along Bell Street abutting the primary shopping area be redefined as secondary frontage. These areas are currently designated as areas for small business in the Borough Local Plan 2005; however, their use – which include a mixture of retail, food & drink and commercial/business units – all contribute to the town centre as a whole.

**Figure 11 Current Town Centre Uses**

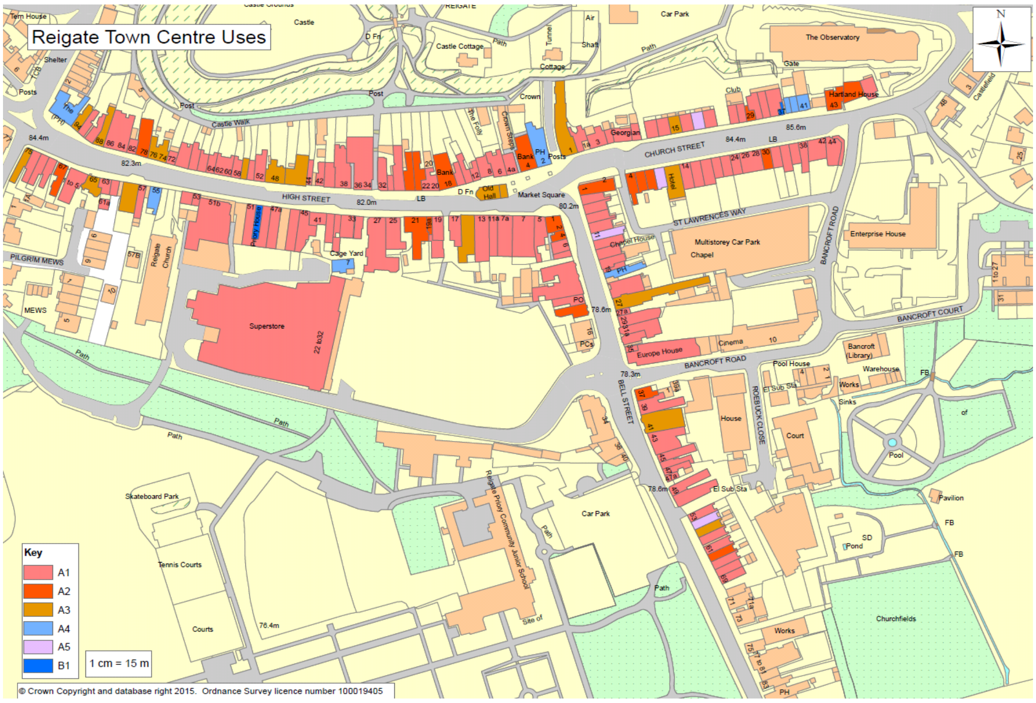
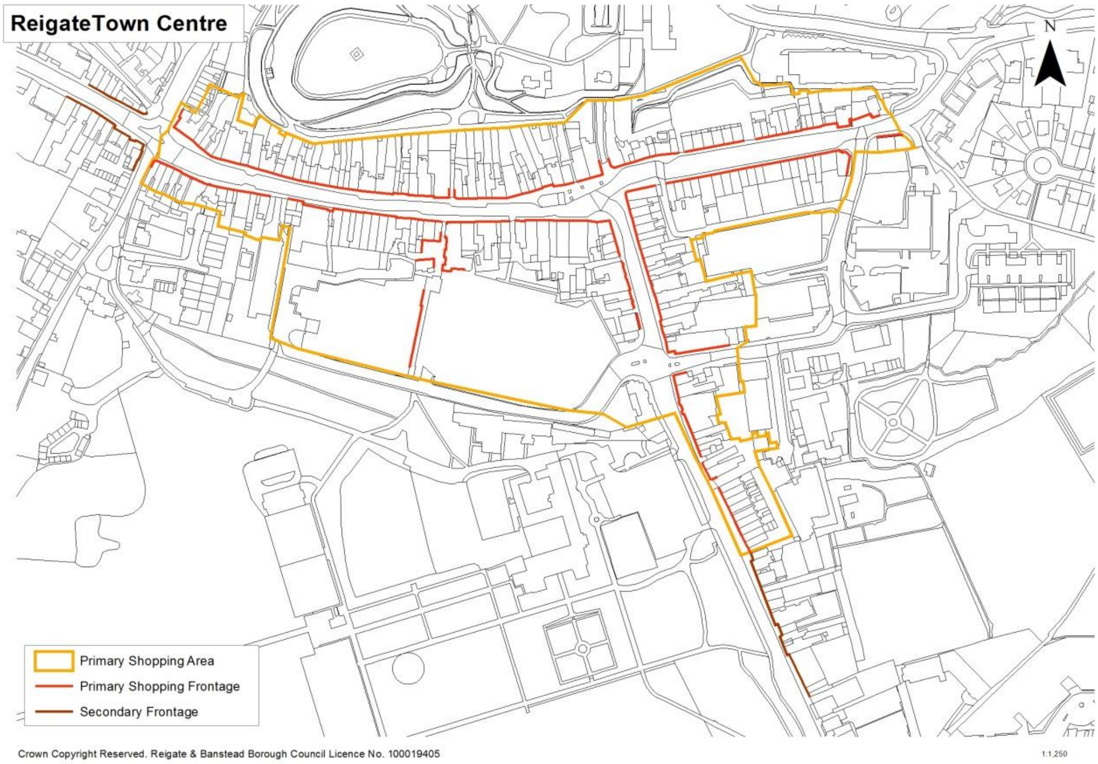


**Figure 12 Proposed Frontages and Primary Shopping Area**




# Defining town centre boundaries

## Methodology

3.18 In the absence of any current national guidance, the following considerations have been used to define town centre boundaries[10]. These are partly based on guidance contained within the now superseded Planning Policy Statement 4: Planning for Sustainable Economic Growth and partly from definitions offered by the NPPF (para. 1.3).

- **Architectural and Built Form:** Areas of larger scale buildings and urban design, and historic architectural forms are often indicative of public realm. In the borough, settlements are typically centred around a historic core and identification of (particularly sudden) changes of scale and design may suggest a boundary to a town centre area. Buildings greater than two storeys in height and groups of buildings with common architectural themes in particular may be considered.

- **Geographical Features & Barriers:** Physical and natural features that form either a sense of enclosure (e.g. sudden changes in contour, rivers etc.); a clear delineation of function (e.g. park boundaries, industrial estates); or a permanent

[10] Inclusion of land within the town centre boundary does not automatically indicate that sites are developable, nor does it prevent the land from being subject to other overlapping designations such as urban open land. Parks, conservation areas etc. which may place restrictions on development.

barrier (e.g. railway line, major road) should be used to form compact, defensible and well-defined town centre boundaries.

- **Land Uses:** Areas within town centres will demonstrate a mixture of land uses within the “main uses” listed in the NPPF. There will be continuity in such uses and isolated groups of premises, or single premises, will not be included unless there is some other functional link (e.g. where an intervening area is earmarked for redevelopment or regeneration resulting in an unbroken link). Edge-of-centre sites identified for redevelopment for town centre uses will generally be included, taking into account needs identified in the evidence base.

### Banstead

3.19 The northern edge of the centre is characterised by an abrupt change in function, where the premises on the High Street back onto residential areas, mostly with a service/ access road in between. Due to the change in land uses, it is proposed that this forms a logical boundary running from Buff Avenue to the east, to Bolters Lane to the west.

3.20 To the west of Bolters Lane is The Horseshoe, containing a public car park, library, clinic, civic centre and youth centre. Although to an extent Bolters Road forms a physical barrier, there are pedestrian crossings present which aid ease of access, and help to partially integrate The Horseshoe with the town. As such, it is proposed that the library and clinic, given their community use, are included within the town centre boundary only, with the boundary drawn along the northern edge of these sites. There may also be opportunities to enhance connectivity through redevelopment and regeneration of The Horseshoe in the medium to long term.

3.21 The Horseshoe also includes other premises, such as a retirement home, social housing and a school. Concerning geographical and land use considerations, the Horseshoe itself forms a compelling geographical boundary, but the uses and character of the northern section fall more into an edge of centre description as defined by the NPPF. Whilst the Horseshoe area has been identified as a potential development opportunity site, there are no firm regeneration proposals for these premises and therefore the boundary line is recommended as stated above.

3.22 To the south of the High Street at the western end there remains an abrupt transition between residential and commercial uses. However the central section of the High Street opens up to a car park and open green space associated with All Saints’ Church. Due to its location to the rear of the High Street, it is proposed that the car park remains excluded form the boundary.

3.23 Part of the green space associated with the church closest to the High Street forms part of the town centre environment and character. It is suggested that the boundary includes this area.

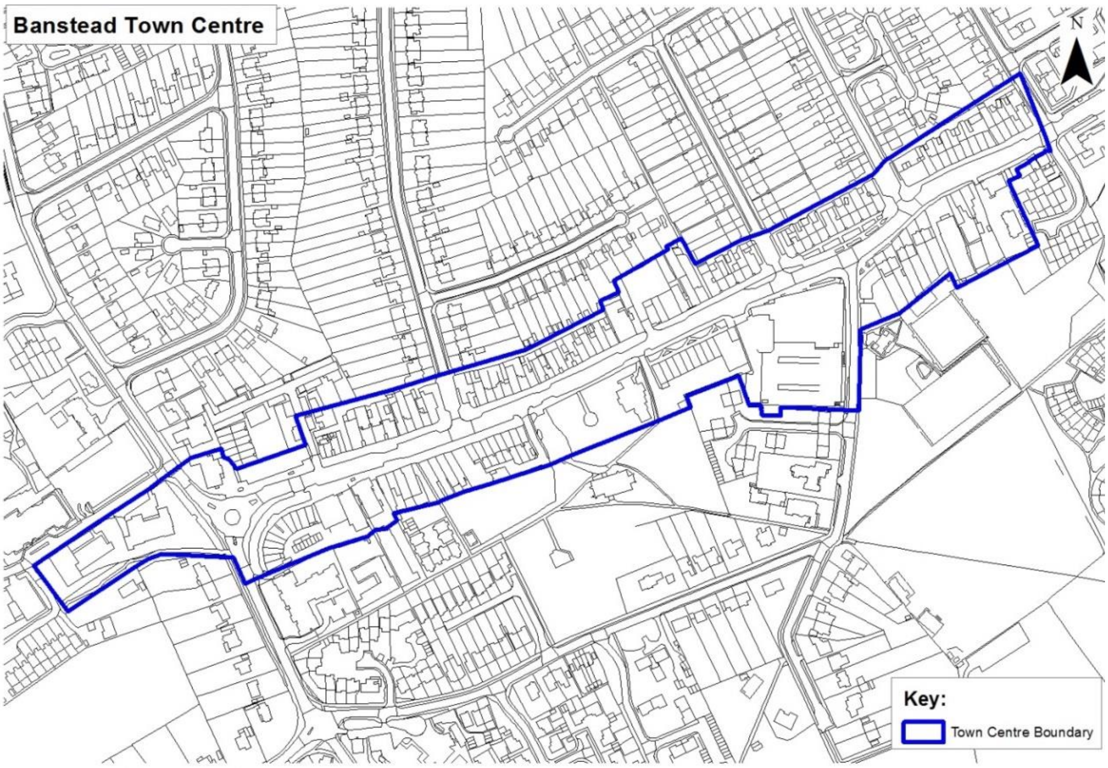
3.24 Continuing east, it is proposed that the boundary is drawn along the rear of the block of commercial units 80-100 High Street, and continues to include the Waitrose site at the corner of High Street and Avenue Road, due to its scale and use. The supermarket has a frontage to both roads and plays an active part in the current town centre's retail offer.

3.25 A number of uses on the southern side of the High Street, continuing to the east, are proposed to be included within the town centre boundaries, which comprise Nos. 136 to 168 due to the mix of active uses they offer to the centre, which include restaurants, shops and a church.

3.26 At the eastern end of the High Street are Banstead Community Centre and Woolpack Pub. Whilst both could contribute to the vitality of the town centre, we have excluded them from the town centre boundary: the community centre has a more isolated feel as its principal aspect is towards the residential streets to the east; and if we were to include the Woolpack Pub to avoid a messy and complicated boundary we would have to include Cheyne Court and Chiltons Close which are residential areas.

3.27 Directly to the east of Avenue Road is the Lady Neville Recreation Ground. The site has public playgrounds, tennis courts, bowling green, paddling pool and pavilion with a café. Regarding geographical considerations, given its set back behind premises in the High Street, and that it does not provide an active frontage with the High Street, it is proposed to not include this within the town centre boundary.

**Figure 13 Proposed Banstead Town Centre Boundary**






Scale 1:2,000

## Horley

3.28 The Borough Local Plan defines a town centre boundary for Horley. It has been reviewed to ensure that it remains fit for purpose. Annex 1 compares the proposed to existing boundary.

3.29 To the north of the town, the boundary is proposed to exclude Harrow House, Albert Road, due to its residential use. The workshop at No. 23 Albert Road is proposed to be included due to its active use.

3.30 On the northern side of Victoria Road are the library and a health centre. These uses qualify as appropriate uses within the town centre and it is therefore proposed that they are included within the boundary. The library has been identified as a potential development site, subject to alternative provision, for mixed use residential and community use and therefore would be appropriate for inclusion within the town centre boundary.

3.31 Opposite on the southern side of Victoria Road is the Telephone Exchange. This site has been identified as a potential opportunity for mixed use residential and community use. It would therefore be appropriate for inclusion within the town centre boundary.

3.32 The car park to the south of this site is currently bisected by the town centre boundary. It is proposed that the boundary is amended to include the whole car park to ensure a well-defined boundary line with more continuity.

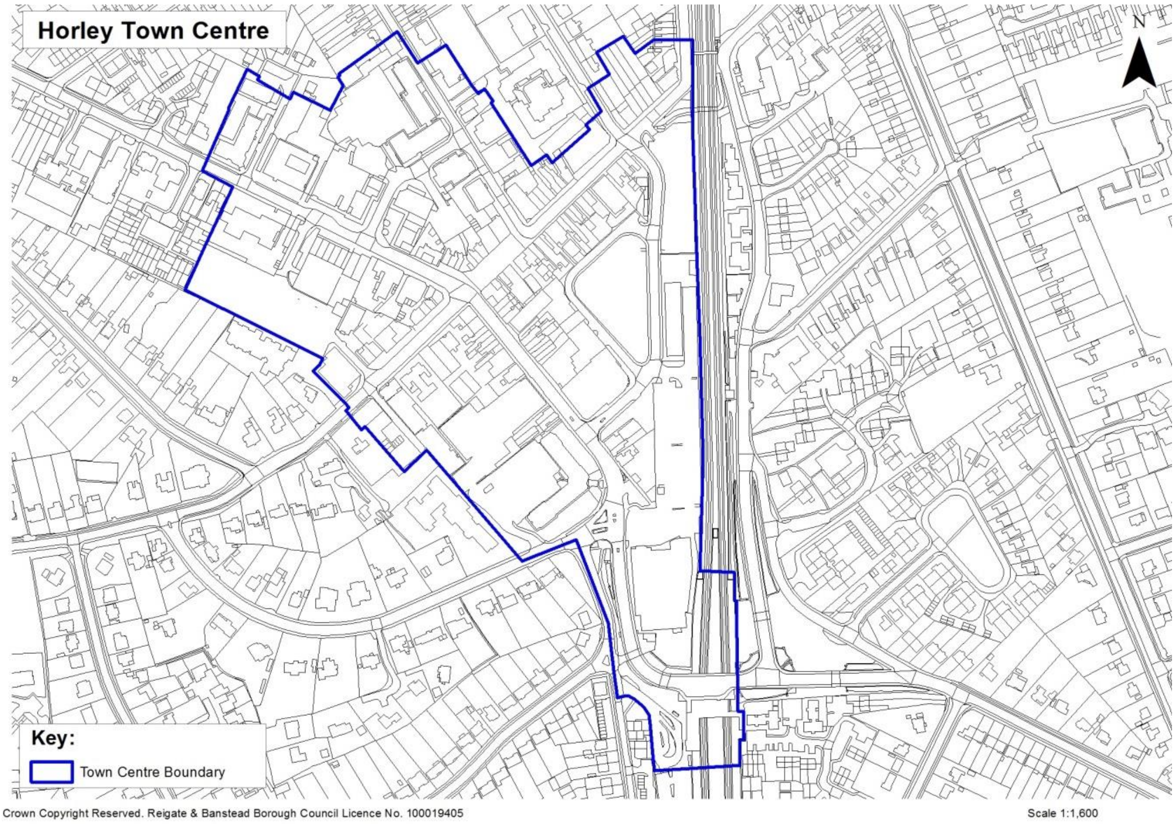
3.33 The remainder of the town centre boundary line is proposed to remain the same. Beyond the car park, the boundary line continues south east, alongside the veterinary centre in Massetts Road, including active uses along this road and High Street, which form the main core of the town centre, and onwards to Russells Crescent to include the former Newman House site (Russells Square – 4 new retail units).

3.34 The town centre boundary line continues southwards to include Horley Station and Waitrose. The rail line forms a distinct physical barrier to form the east boundary line.

3.35 To the east of the railway line is a mixed parade of shops, restaurants and other premises along Station Road. This continues to the road junction of Station Road, Balcombe Road and Smallfield Road. Although the Station Road area is partially visible from the east most end of the High Street, it is physically and visually separated by the virtue of the railway line. It is not proposed for inclusion within the town centre boundary as it has its own discrete function, and instead, it is proposed as a new Local Centre (see Local Centres evidence paper prepared in support of the Regulation 18 DMP).

3.36 The town centre boundary continues westwards to include premises in High Street and Consort Way, where no changes are being proposed to the existing Borough Local Plan boundary line.

**Figure 14 Proposed Horley Town Centre Boundary**




## Reigate

3.37 Reigate forms the historic urban centre of the Borough, and whilst it has a very well defined High Street, the extent of the town centre is more difficult to define. To the north is Reigate station: a well-used transport node within easy walking distance of the shopping areas. However, between the station and the High Street is an area of large scale offices, and the historic Castle Grounds. This intervening area has a busy feel and experiences high volumes of vehicle traffic and pedestrians coming from and going to the station, along with the comings and goings of workers from the offices. Also situated in this area is Reigate Town Hall which forms the administrative headquarters of Reigate & Banstead Borough Council and gives this area a strong civic function.

3.38 It is recommended that the northern-most part of the town centre boundary be defined by the railway line, which forms a distinct physical barrier here, across London Road. On the north side of the railway line are a number of shops, restaurants, and cafes, which continue on to Holmesdale Road. This area also features the main entrance to Reigate Station, and the Prince of Wales Pub. This area is currently identified in the Borough Local Plan as an area for small business; it is not proposed to include this area within the town centre boundary but instead designate it as a new local centre.

3.39 The proposed town centre boundary includes the offices at Douglas House, Rushworth Road, but does not extend eastwards to include the Homebase store. The

Borough Local Plan designates this area as a retail warehousing area, a designation proposed to be carried forward. Exclusion of the site maintains a distinction between the out-of-centre use and the primary shopping area and ensures the more vulnerable primary shopping area is protected,

3.40 The Borough Local Plan shows a somewhat contrived boundary for the town centre business area excluding the small group of houses formed by 26, 28 and 30 London Road. These are now proposed to be included within the town centre boundary, in order to produce a boundary line of more uniform continuity southwards, towards the large scale office site at Watson House. Whilst clearly residential, these houses do not stand out as being significantly functionally divorced from the surrounding uses, and in terms of townscape and urban realm, these attractive buildings (nos. 26 & 28 are Grade II listed buildings) make a positive contribution to the character of the wider area. This does not necessarily imply that a change of use of Nos. 26, 28 & 30 London Road away from residential use would be supported, but given the character of the locality and the surrounding uses, residential occupation may prove not to be the only suitable use for these buildings.

3.41 The town centre boundary is recommended to continue southwards to include further offices in Castlefield Road, including the large scale buildings comprising offices at the junction of Castlefield Road with Church Street. Reigate College and its grounds, immediately to the east is not proposed for inclusion since this site has an educational use, which is not a main town centre use.

3.42 To the west, commercial premises exist from 51 to 31 London Road and these back onto residential properties, forming an obvious boundary. Beyond 31 London Road the buildings are in residential use until the Upper West car park. On the south side of the road are the castle grounds. The road itself is considered to form a logical boundary in this section.

3.43 The street layout becomes more complex at the western part of the town centre. The car park on Upper West Street gives good access to the High Street and is immediately bordered by housing. There is a triangle of land formed by Upper West Street, London Road and Slipshoe Street. This street layout combined with the general high quality and historic merit of the buildings provides visually attractive street scene views. This sense of character continues to the point at which Upper West Street forms an oblique junction with West Street. Continuing along West Street itself, town centre uses gradually decrease towards Dorking with a marked drop-off of main town centre uses west of the Upper West Street junction.

3.44 It is proposed that, given the visual break as well as the tapering off of uses further west, the town centre boundary ends at the road junction of Upper West Street with West Street, and follows the rear boundary of the various premises on the southern side of West Street, to Park Lane to the east. This would incorporate the currently designated area for small business, giving the variety of uses it encompasses appropriate protection.

3.45 Park Lane is primarily a residential street with vehicular access to Priory Park. There are no main town centre uses beyond the very northern end, where a butcher's, shop and restaurant lie. The town centre boundary is therefore proposed to cross Park Lane behind these premises. To the east of Park Lane, the units on the south side of the High Street back on to residential sites, some of them redeveloped in the last few years. It is recommended that the town centre boundary follows the rear boundaries of the High Street units until Morrison's Supermarket is reached, which would be included within the boundary line.

3.46 The area south of the High Street and supermarket is dominated by Priory Park, a flagship park which has benefited from significant restoration works. The park is a highly valued part of Reigate town and provides a foil to the bustling High Street. Whilst the park is a vital part of the town it is not considered appropriate to include it within the town centre boundary as it has something of a stand-alone status. Its size is also considerable and being unconstrained to the south east, the park falls within the metropolitan Green Belt. It is therefore proposed that the boundary of the park is used to define the edge of the town centre.

3.47 Currently the east end of Castlefield Road and some of Church Street are defined by boundary lines designating the town centre business area and secondary shopping area. The proposed town centre boundary would extend further eastwards to include smaller office units on the southern side of Church Street (Castlefield Court and No. 48), as well as the Jack Wills retail unit at No. 46 Church Street.

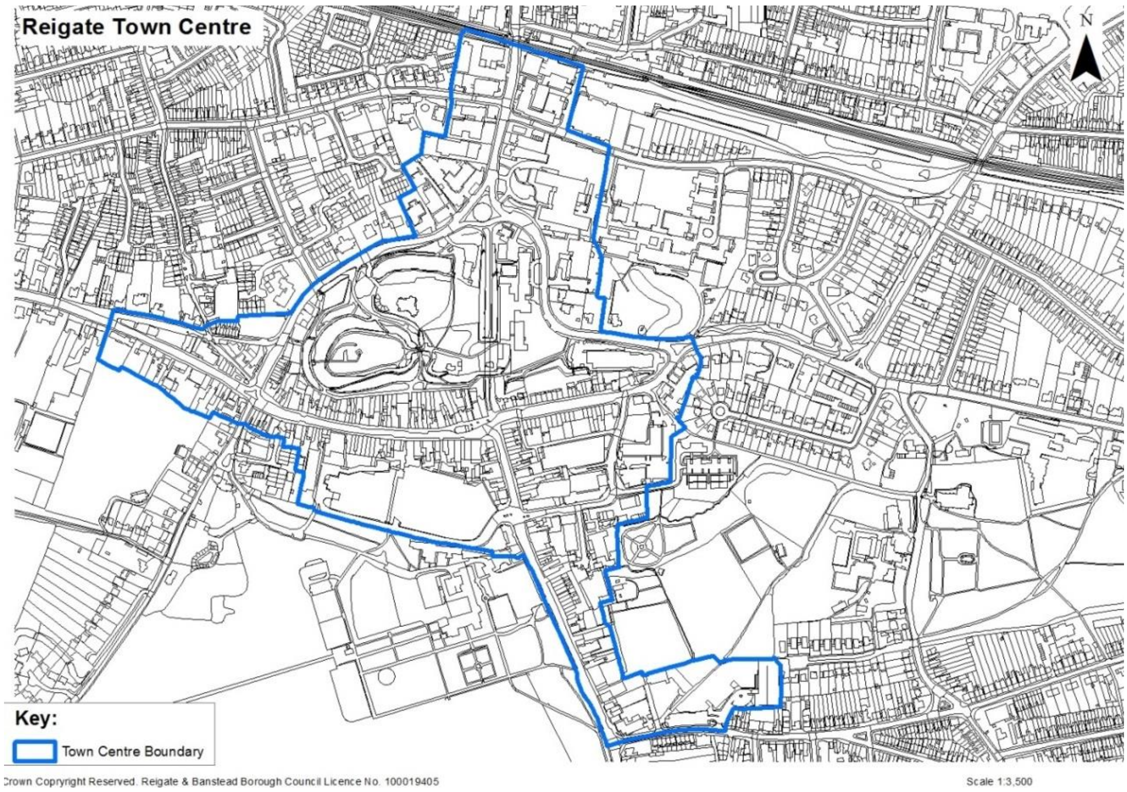
3.48 The town centre boundary is proposed to be extended further to the east, and further back from the primary and secondary shopping areas to include the buildings situated on Bancroft Road (including the Library and Pool House site) which are currently designated as an area of small business.

3.49 It is recommended that the town centre boundary be extended in the south east corner to include the large scale offices (The Omnibus Building) on the north side of Lesbourne Road, due to their prominent use and contribution to the town centre vitality. The site was previously a bus station and its redevelopment has increased the functional link between the town centre and the shopping parade in Lesbourne Road. However, the Lesbourne Road parade still retains a sense of independence and there is little to suggest that High Street shoppers also use this part of town, therefore, it is not recommended that the town centre boundary is extended to incorporate this area, which should be considered as a local shopping centre.

3.50 Priory Park extends as far as Bell Street, the southern artery into and out of Reigate. Commercial and retail premises dominate the east side of Bell Street, almost as far as Lesbourne Road. Liberty House at the junction of Bell Street and Lesbourne Road and some of the neighbouring units have recently been converted to residential use. However, as the large scale offices comprising the Omnibus Building to the east are proposed to be included within the town centre boundary, it would be difficult to exclude Liberty House, as well as the neighbouring conversions, and therefore they are also recommenced for inclusion in order to produce a more logical boundary line configuration. Liberty House in terms of its architecture and built form is a prominent building at this road junction, and therefore is considered to represent a logical limit to the town centre on Bell Street.

3.51 Enclosed by Bell Street, Lesbourne Road and Church Walk is a large area of green space situated to the north of the Omnibus building and to the east of buildings in Bell Street. Despite its proximity to the busy High Street, this area forms an attractive and peaceful environment. It contains playing fields, a bowling green and memorial gardens which form one of the two burial sites within the Borough. This space does not readily interact with the High Street and newcomers to the town could be forgiven for not realising it exists. Given that it does not provide an active frontage, it is not recommended for inclusion within the town centre boundary.

**Figure 15 Proposed Reigate Town Centre Boundary**




## Redhill

3.52 In the Borough Local Plan Redhill does not have a town centre boundary as such. Instead it is denoted by designations such as town centre business area, primary & secondary shopping areas, shopping street frontages, employment areas and area for small businesses. Defining the town centre boundary will help strengthen the town centre and ensure that the health of the town centre continues to improve, supporting its growth, regeneration and retail offer.

3.53 The town centre business area currently incorporates the former Crown Buildings at the northern most point and then continues southwards along London Road including the large scale office buildings on the east side of this road, and extends to cover areas to the east and west at the junction of Princess Way with London Road and Gloucester Road. To the east this designation covers Quadrant House, Princess

Way, whilst to the west coverage includes the Methodist Church, Gloucester Road, the Telephone Exchange on Clarendon Road, and further office buildings in Queensway, Station Road and St. Matthews Road.

3.54 The proposed town centre boundary will follow some parts of the existing town centre business area designation but will extend in parts to account for regenerated areas. It is proposed that the core of the town centre continues to include shopping street frontage areas including the Belfry Indoor Shopping Centre, the Warwick Quadrant, Harlequin Theatre, library and bus station.

3.55 Memorial Park on the east side of London Road is proposed for inclusion within the town centre boundary. The park has undergone significant regeneration and now includes a large café, active sports and leisure uses. The park forms an integral part of the town centre, contributing to its vibrancy.

3.56 The car park on the north side of Gloucester Road is proposed for inclusion within the town centre boundary, as this is an opportunity site identified in the draft Redhill Town Centre Area Action Plan and identified as a potential development site in the Regulation 18 DMP consultation.

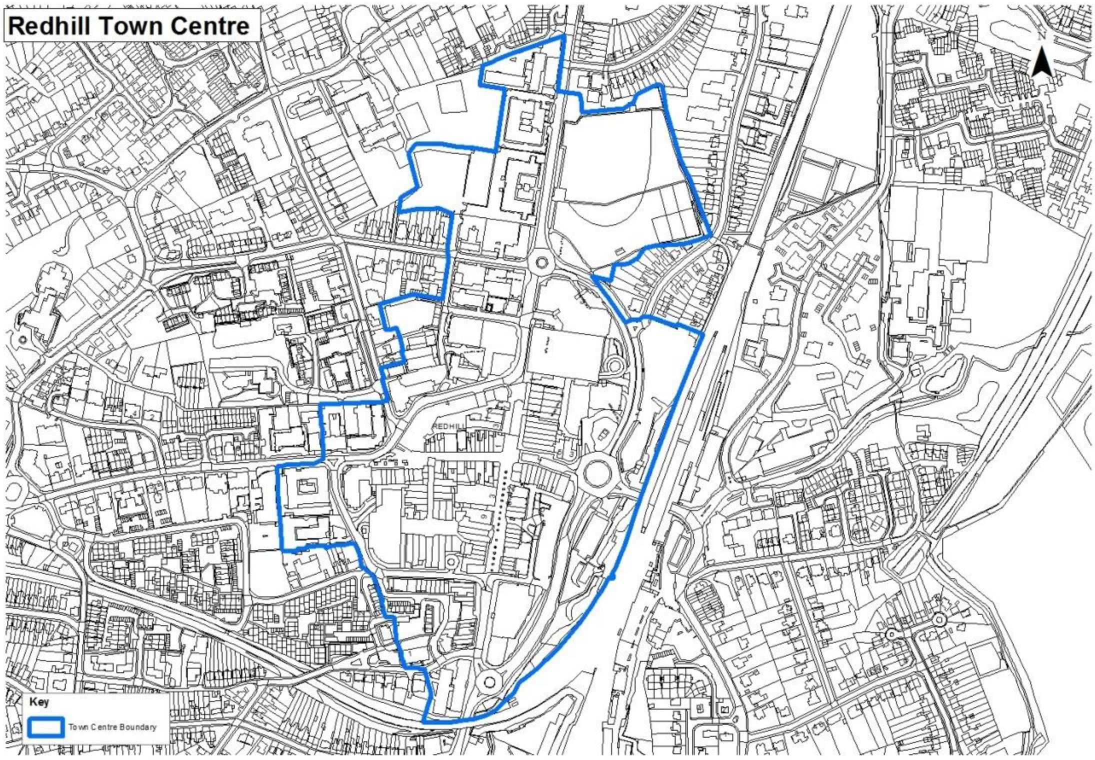
3.57 To the south beyond Cromwell Road it is proposed that the town centre boundary would extend to include offices in Huntingdon Road and Chapel Road and beyond to the major roundabout junction of High Street with Brighton Road and Marketfield Way. This area includes Cromwell Road for which regeneration is proposed.

3.58 The office buildings provide a prominent visual gateway into the town and therefore it is proposed that the boundary stops at the railway line.

3.59 It is proposed that the eastern side of the town centre boundary is limited by the railway line which forms a physical barrier. Redstone Hill has a different character to the main town centre (it is largely residential).

3.60 The proposed town centre boundary includes the station car park and the former Liquid & Envy Night-club – both have planning permissions for retail development.

**Figure 16 Proposed Redhill Town Centre Boundary**

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# 4. Managing uses in town centre frontages

## Introduction

4.1 The NPPF says that the primary frontage should include a high proportion of retail uses (which may also include food and drink) and the secondary frontage should provide greater opportunities for a diversity of uses (for example restaurants, cinemas and businesses).

4.2 The Council currently manages the level of retail through measuring A1 occupancy. It does this through the application of minimum thresholds. The Borough Local Plan 2005 seeks to maintain:

- Minimum 80% occupancy of Class A1 retail across each alphabetised primary frontage in both Redhill and Reigate and 75% in Banstead and 70% in Horley
- Minimum 66% occupancy of Class A1 retail across each alphabetised secondary frontage in Redhill and Reigate.

4.3 This approach is not considered flexible enough to permit uses other than A1 which could contribute to the vitality and vibrancy of the town centre. The Borough Local Plan was written at a time when retail was the primary use of town centres. Whilst the clustering of retail uses can contribute significantly to the vitality and viability of the town centres, the distinction between shopping and leisure has become increasingly blurred and there is an increased focus on providing a night-time economy. Therefore, a suitable balance needs to be established in policy to retain a retail core and allow flexibility for changes of use which would contribute to the vitality of the town centre.

## Current Situation

4.4 The majority of the frontages lie below the current A1 occupancy thresholds.

**Table 5 A1 Occupancy**

| | Banstead | | Horley | | Reigate | | Redhill | |
|---|---|---|---|---|---|---|---|---|
| | Actual (%) | Threshold (%) | Actual (%) | Threshold (%) | Actual (%) | Threshold (%) | Actual (%) | Threshold (%) |
| A | 66.7 | 75 | 38.5 | 70 | 77.1 | 80 | 50.0 | 80 |
| B | 72.7 | 75 | 58.8 | 70 | 80.0 | 80 | 33.3 | 80 |
| C | 50.0 | 75 | 47.6 | 70 | 42.9 | 80 | 60.0 | 80 |
| D | 76.5 | 75 | 50.0 | 70 | 72.2 | 80 | 36.8 | 80 |
| E | 81.8 | 75 | 75.0 | 70 | 61.5 | 66 | 50.0 | 80 |
| F | 65.5 | 75 | 55.0 | 70 | 58.3 | 66 | 62.5 | 80 |
| G | | | 83.3 | 70 | 66.7 | 66 | 54.5 | 80 |
| H | | | 25.0 | 70 | 58.8 | 66 | 70.6 | 80 |
| I | | | | | 72.2 | 66 | 33.3 | 66 |
| J | | | | | 66.7 | 80 | 50.0 | 66 |
| K | | | | | | | 50.0 | 66 |
| L | | | | | | | 25.0 | 80 |
| M | | | | | | | 87.0 | 80 |
| N | | | | | | | 74.1 | 80 |

4.5 The occupancy threshold is currently applied to each alphabetised frontage. The loss of large units skews the A1 occupancy rate – the alphabetised system is more stringent than a single threshold applied to primary (and secondary) frontages. To provide more flexibility, it is therefore proposed, for each town centre, to introduce a single primary (and where applicable a secondary) threshold.

4.6 Applying the A1 occupancy rate to each proposed frontage shows that they currently fall below the Borough Local Plan thresholds.

**Table 6 A1 occupancy**

| | Primary Frontage | Current Threshold | Secondary Frontage | Current Threshold |
|---|---|---|---|---|
| Banstead | 69% | 75% | | |
| Horley | 52% | 70% | | |
| Redhill | 63% | 80% | 39% | 66% |
| Reigate | 73% | 80% | 64% | 66% |

4.7 The Borough Local Plan measures A1 occupancy. It is proposed to amend such that thresholds measure A1 rate (i.e. occupied and vacant A1 units). Whilst vacant units do not add to the vibrancy and vitality of the town centre, planning permission is required for a change of use and the units may only be vacant temporarily.

4.8 Despite the inclusion of vacant units, table 7 shows that the frontages still lie below the A1 Borough Local Plan threshold. It is therefore proposed to redefine the thresholds so that they are more realistic and reflective of the 'on-the-ground' position.

**Table 7 A1 units**

| | Primary Frontage | Current Threshold | Secondary Frontage | Current Threshold |
|---|---|---|---|---|
| Banstead | 73% | 75% | | |
| Horley | 54% | 70% | | |
| Redhill | 71% | 80% | 46% | 66% |
| Reigate | 77% | 80% | 65% | 66% |

## Proposed Approach

4.9 The following will be taken into consideration in setting new frontage thresholds:

- Actual A1 rate
- Vacant units and vacancy patterns over time
- Planned and proposed changes to the town centres
- Findings from the Retail Needs Assessment.

### Banstead

4.10 There are no proposed changes to the primary frontage within Banstead. Historically Banstead's frontage has not met the A1 threshold; it has a good proportion of A1 retail however this has fallen in the last 10 years. Conversely, the number of vacant units has increased considerably (1 to 7) and the majority of the vacant units are A1 (71%). With changing retail habits, it is proposed that the A1 retail threshold should be lowered. This will allow for some flexibility to allow for changes of use.

**Table 8 Banstead Town Centre**

| | |
|---|---|
| Frontages | No proposed changes to the primary frontage. |
| Current A1 retail representation | A1 retail occupies 73% units.<br>Fallen from 75% (2006). |
| Vacancy | 7 vacant units (2016).<br>Majority of vacant units A1 (71%).<br>Vacant units increased from 1 in 2006. |
| Proposed A1 threshold | 65% |

4.11 The Retail Needs Assessment identified a representation of food & drink premises above the national average and in particular good representation from national operators. It is therefore proposed that if A1 retail is below the threshold that changes of use require evidence of marketing and evidence that the proposed use would make a positive contribution to the town centre. This should include evidence of footfall and provision of an active frontage.

### Horley

4.12 As set out above, it is proposed to extend the primary frontage to include 71 Victoria Road (2 retail units under construction) and Russell Square (4 new retail units).

4.13 The Retail Needs Assessment identified Horley to be underperforming; historically the town centre has had high numbers of vacant units and an A1 rate considerably below the threshold. It is therefore recommended that the threshold is lowered to approximately the current level. Whilst the current retail offer has been identified as poor (a large proportion of the units are occupied by charity and second-hand stores), on balance it is felt that it should not be lowered further to enable a retail core to be maintained.

**Table 9 Horley Town Centre**

| | |
|---|---|
| Frontages | Proposed boundary extension to include 71 Victoria Road (planning permission granted and under construction for 2 retail units) and Russells Square (recently developed, 4 retail units, 2 occupied). |
| A1 Retail | Current Frontages:<br>A1 retail occupies 54% units.<br>Fallen from 62% (2006).<br><br>New Frontages:<br>71 Victoria Road: under construction; occupiers unknown<br>Russells Square: recently completed; 2 of 4 occupiers operating |
| Vacancy | 4 vacant units (2016).<br>Fallen from 9 vacant units (2006).<br>Considerable fall in vacant units 2015 to 2016 (8 to 4). |
| Proposed A1 threshold | 55% |

4.14 However, the Retail Needs Assessment specifically identified a need to increase representation of food and drink operators within the town, recognising that the current provision is poor with limited representation from national brands. Improving food & drink provision will increase dwell time and make Horley more of a destination. It is therefore proposed that permissions for the change of use away from A1 to A3 uses – even where it would result in the A1 frontage falling below the relevant threshold – will be permitted provided it would not bring about an overconcentration[11] of such uses in the vicinity. This will provide flexibility to expand and improve the A3 offer but in a managed way.

## Redhill

4.15 No change is proposed to the primary frontage. It is proposed to expand the secondary frontage to include the station and former Liquid & Envy Night-Club which both have retail permissions.

4.16 Historically the town centre has had high numbers of vacant units and the A1 rate is below the threshold. There are currently 25 vacant units and 56% of these are A1. It is therefore proposed that the threshold is lowered.

[11] An overconcentration of A3 units is defined as creating (or further extending) a continuous frontage of 2 or more non-A1 units

**Table 10 Redhill Town Centre**

| | |
|---|---|
| Frontages | No changes are proposed to the primary frontage.<br>Proposed extension of secondary frontage to include Station and former Liquid & Envy Night-Club (areas with planning permission for retail development). |
| A1 Retail | **Existing Frontages**<br>Primary Frontage<br>A1 retail occupies 72%.<br>Fallen from 74% (2006).<br><br>Secondary Frontage<br>A1 retail occupies 46%.<br>Fallen from 48% (2006).<br><br>**Proposed Frontages**<br>Permissions extant/ under construction. Retail occupiers unknown. |
| Vacancy | 25 vacant units (2016) - 56% vacant units A1.<br>Increased from 9 units (2006). |
| Proposed A1 threshold | Primary Frontage: 65%<br>Secondary Frontage: 40% |

4.17 The Retail Needs Assessment identified scope to improve the evening economy and a need to improve the food & drink provision within the town centre. Although this will potentially improve somewhat as a result of the proposed Marketfield Way development, there is still considered to be justification for widening the food & drink offer elsewhere in the town. As with Horley, it is therefore proposed that – even should the threshold of non A1 uses be exceeded – changes of use from A1 to A3 are permitted provided they would not bring about an overconcentration[5] of such uses in the vicinity.

4.18 For the secondary frontages where a proposal would result in the proportion of A1 frontage falling below the relevant threshold, it is suggested that permission should 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. A2-A4 or D2 uses will be considered more favourably than other uses.

## Reigate

4.19 It is proposed that the existing identified frontages become primary frontages. It is also proposed that the parade along West Street immediately abutting the high street to the west and the parade beyond the primary shopping area along Bell Street is identified as areas of secondary frontage.

4.20 Reigate is a well performing town centre. Historically the centre has had a low number of vacant units but its A1 retail has fallen below its primary and secondary frontage threshold. It is therefore proposed to lower the threshold. This will also allow for some changes of use which will improve offer.

**Table 11 Reigate Town Centre**

| | |
|---|---|
| Frontages | It is proposed that the existing secondary frontage is redefined as primary frontage.<br>Proposed to allocate the parade along West Street immediately abutting the high street to the west and the parade beyond the primary shopping area along Bell Street as secondary frontage. |
| A1 Retail | **<u>Existing Frontages</u>**<br><u>Primary Frontage</u><br>A1 occupies 77%.<br>Increased from 76% (2006).<br><u>Secondary Frontage</u><br>A1 occupies 64%.<br>Fallen from 65% (2006).<br><br>**<u>Proposed Frontages</u>**<br><u>Secondary Frontage</u><br>57% A1. |
| Vacancy | 5[12] vacant units (2016) – 75% units A1.<br>2 vacant units (2015)<br>6 vacant units (2006)<br>Historically low numbers of vacant units, re-let quickly. |
| Proposed A1 threshold | <u>Primary Frontage:</u> 70%<br><u>Secondary Frontage:</u> 55% |

4.21 The Retail Needs Assessment identified a good proportion of food & drink units but that this had not met saturation. Lowering the threshold will result in some changes of use to food & drink. However, if the application would result in A1 retail falling below the new threshold it is suggested that evidence be required that the unit has been vacant and marketed for 6 months and evidence that the proposed use would make a positive contribution to the vitality, viability, balance of services and/ or evening economy of the town centre. Unlike Horley & Redhill it is not proposed that in the event that the threshold of non A1 uses be exceeded conversion of A1 to A3 (providing no overconcentration of A3) should be included as a policy principle given the already strong A3 representation within Reigate and the need to continue to secure good quality A1 provision.

4.22 For the secondary frontage a threshold of 55% is proposed. The current A1 percentage is 57%. In line with the changing retail patterns, this would allow some limited flexibility for changes of use. Where a proposal would result in the proportion of A1 frontage falling below the threshold, it is suggested that permission should 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. A2-A4 or D2 uses will be considered more favourably than other uses.

4.23 Therefore, in summary, the following frontages thresholds are recommended for inclusion in the DMP:

[12] 3 units at time of monitoring were either undergoing refurbishment or subject to live permissions

**Figure 17 Proposed Frontages**

| | Primary Frontage | Secondary Frontage |
|---|---|---|
| Banstead | 65% | |
| Horley | 55% | |
| Redhill | 65% | 40% |
| Reigate | 70% | 55% |

# 5. Establishing a local retail impact threshold

## Introduction

5.1 The NPPF requires retail impact assessments for retail developments outside of town centres, which are not in accordance with an up-to-date Local Plan, if the development is over a proportionate locally set floorspace threshold. If there is no locally set threshold, the default threshold is 2,500sqm.

5.2 A Retail Impact Assessment should include:

- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made (for major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made)

5.3 In setting a local threshold, the NPPG suggests that the following be considered:

- Scale of proposals relative to town centres
- The existing viability and vitality of town centres
- Vulnerability of town centres
- Likely effects of development on any town centre strategy
- Cumulative effects of recent developments
- Impact on any other planned investment

5.4 In this assessment, consider is first given to whether it is necessary to set a local retail impact assessment threshold, and then what the threshold will be.

## Rationale for a local threshold

### Comparison of national threshold to current local retail provision

5.5 Given local circumstances (the size of retail units), the Council considers that the national threshold (2,500sqm) is inappropriate in the borough.

5.6 A new development meeting the national threshold would be of significant scale compared to the amount of retail floorspace on offer in the borough's existing town centres. Depending upon the centre, a new development 2,500sqm would be the equivalent of 31%-45% of the total existing convenience floorspace and 25%-63% of the total existing comparison floorspace within that centre.

5.7 It is therefore considered very likely that the borough's town centres would begin experience adverse effects in terms of trade draw and competing investment at a scale of development significantly below the national threshold.

5.8 In addition to the town centres, the borough has 18 local centres which are of significantly smaller scale than the town centres. The Core Strategy recognises their valuable contribution in providing for local needs and complementing the town centre retail offer. For the local centres, a development of 2,500sqm would be almost 1.5 times the floorspace in the borough's average local centre. Again, the effects on trade draw and vitality/viability are therefore likely to start being felt far below the 2,500sqm threshold.

**Table 12 2,500sqm as a Percentage of Town Centre Floorspace**

| | Convenience | | Comparison | | Total | |
|---|---|---|---|---|---|---|
| | Total Floorspace (sqm) | 2,500sqm as a % | Total Floorspace (sqm) | 2,500sqm as a % | Total Floorspace (sqm) | 2,500sqm as a % |
| Banstead | 5515.4 | 45.3 | 3957.8 | 63.2 | 16069.3 | 15.6 |
| Reigate | 7555.0 | 33.1 | 9999.0 | 25.0 | 46298.0 | 5.4 |
| Redhill | 8960.9 | 45.3 | 23256.0 | 63.2 | 19859.0 | 15.6 |
| Horley | 8092.4 | 30.9 | 5690.4 | 43.9 | 21110.4 | 11.8 |
| Total | 30123.7 | 8.3 | 42903.2 | 5.8 | 103336.7 | 2.4 |

**Table 13 2,500sqm as a Percentage of Local Centres Floorspace**

| | Convenience | | Comparison | | Total | |
|---|---|---|---|---|---|---|
| | Total Floorspace (sqm) | 2,500sqm as a % | Total Floorspace (sqm) | 2,500sqm as a % | Total Floorspace (sqm) | 2,500sqm as a % |
| Local Centres | 3088.9 | 80.9 | 5272.1 | 47.4 | 1671.0 | 149.6 |

## Town centre performance/ vulnerability

5.9 In determining a locally appropriate threshold, the NPPG indicates that consideration should be given to the viability and vitality of town centre centres and their vulnerability. This is important because, as both the NPPF and the Council's Retail Needs Assessment identify, town centres are the heart of communities and it is important that they have the opportunity to thrive and grow in order to provide an adequate and sustainable retail offer for the residents now and in the future.

5.10 A detailed summary of the health and characteristics of the borough's town centres is set out in Section 2; however, key points in relation to performance and vulnerability are set out below.

### Banstead

5.11 The RNA concludes that Banstead performs well against the majority of health check indicators. Venuescore classifies Banstead as a district grade centre; however, it has the lowest rank nationally of all of the borough's centres at 943. The centre is focused towards the mid-high end of the market with a number of national retailers and food & drink operators.

5.12 Banstead was found to not be a popular location within its catchment for comparison shopping, with competing locations at Kingston, Sutton and Croydon all exerting significant influence over spending patterns within Banstead's catchment. As a result, the leakage of comparison spending within Banstead's two closest catchments (Zone 5 and 6) to shopping locations outside of the borough is between 82% and 92%. Based on survey work, the RNA also identifies that the town centre has a very low sales density in the comparison sector, at only £2,994 per sqm compared to a benchmark of £6,000. On this basis, the comparison sector in Banstead is considered to be particularly vulnerable to further trade loss.

5.13 Banstead fares better in terms of convenience spend retention, with between 40% and 66% of spend within its two closest catchments retained within the borough. However, again, locations outside of the borough have a significant influence on spend with, in both cases, stores outside the borough feature in the top three most popular convenience destinations for these catchments. On a positive note, the majority of retained spend, particularly in Zone 5, is retained within the town centre itself.

5.14 The RNA particularly notes that Banstead has limited physical capacity for expansion and does not experience any notable retailer demand to locate within the town.

**Horley**

5.15 The Retail Needs Assessment identified Horley as a small town centre which is underperforming against a number of key health check criteria. The town centre is identified as being focused at the low-mid end of the market and has limited representation from national retailers. Venuescore classifies the town as a district grade centre and it is the second lowest ranked of all of the borough's town centres (at 918).

5.16 In terms of its role and function, the centre predominantly serves local convenience and service retail needs. The RNA notes that the town has a below average representation from comparison retailers, with very few national retailers (only 1 GOAD key attractor) and a poor selection in terms of fashion and footwear retailers. As a result, comparison goods spend leakage from Horley's core catchment (Zone 3) is relatively high, with more than 77% of spend going to locations outside of the borough. The town is only the second most popular location for comparison spend for residents in its home catchment, with Crawley exerting significant influence on spend patterns in the area. As a result of the under-representation and low quality of the offer, the RNA estimates that the town has the lowest comparison sales density of all of the borough's main centres at £2,089 per sqm, significantly below the benchmark of £6,000.

5.17 Horley town centre exerts a greater influence over convenience goods spend within its core catchment; however, at 41%, this is the second lowest of the borough's town centre. Whilst some stores trade particularly well (e.g. the Waitrose which is identified as overtrading), the town experiences significant competition and trade draw from the nearby out-of-town Tesco store at Hookwood. Unlike the borough's other towns, the retention of convenience retail expenditure has fallen slightly from 35.4% (2006) to 34.3% (2016).

5.18 Horley is identified as having physical capacity to expand and accommodate new development; however, in the short term the study recommends that the focus should be on consolidating and improving the existing offer. In particular, the RNA identifies limited demand from retailers/operators to locate within the town at present. Overall, the town is considered to be comparatively vulnerable to trade loss from large out-of-centre developments.

**Redhill**

5.19 The Retail Needs Assessment found Redhill to be a medium sized town centre with good representation from mid-market national retailers. Venuescore classifies Redhill as a sub-regional grade centre and it is the highest ranking – at 253 – of all of the borough's centres. The town performs relatively well against health check statistics, but has amongst the highest vacancy rate of all of the borough's centres. However, the resident survey identified the need to improve the offer within the town centre.

5.20 The town centre is identified as having a comparatively high proportion of comparison retail provision; however, the clothing and footwear offer is limited and positioned largely at the value-mid range. Redhill has 15 of 31 key GOAD attractors. Retention of comparison spend at locations in Reigate & Banstead in Redhill's two main catchments (Zones 1 and 2) is relatively strong at between 52% and 57%, with Redhill and Reigate town centres the most popular destinations for these catchments. The town does however compete with Croydon, Crawley and Bluewater.

5.21 Redhill also draws reasonable trade for comparison spend from the Caterham area in nearby Tandridge. Based on the survey work, comparison sales density – at £5,993 per sqm - is broadly in line with the benchmark of £6,000. The town is particularly identified as having a poor choice in terms of A3/A5 and general leisure offer.

5.22 Redhill fares quite well in terms of convenience spend retention, with between 76% and 82% of spend within its two main catchment zones retained in the borough. Stores in both Redhill and Reigate town centres exert relatively good influence on convenience spend in these two zones, particularly Sainsbury's in Redhill, and Redhill has increased town centre retention from 45.4% in 2006 to 47.8% in 2016.

5.23 The Retail Needs Assessment identified a comparison retail need of 7,500sqm by 2027 increasing to 13,100sqm by 2032. Significant investment is planned in Redhill, both public and private, in development schemes within the town centre aimed at increasing the amount, choice and quality of comparison, convenience and leisure provision. This investment is potentially sensitive to large edge or out-of-centre developments.

5.24 Overall, Redhill is considered to be trading relatively well; however, the lack of variety and quality across convenience, comparison and leisure sectors means it is potentially vulnerable to growth in competing/out of town locations. The significant planned public and private investment in the town centre may also be sensitive and vulnerable to large edge/out-of-centre retail developments.

### Reigate

5.25 Reigate is identified as catering for the mid-upper market in terms of its retail offer. Venuescore identifies the town as a major district grade centre and it is the second highest ranking of the borough's centres at 435.

5.26 Due to the stock and historic nature of the town, the RNA identifies that many units do not meet the requirements of modern retailers and there is limited scope for expansion/new development. Despite this, the town has particularly low vacancies and experiences relatively good demand from retailers/operators.

5.27 The Retail Needs Assessment identified Reigate as having a very strong trading performance in excess of £9,000 per sqm net in the comparison sector compared to a benchmark of £6,000 per sqm. This reflects the particularly high quality nature of the comparison offer. As with Redhill above, comparison spend retention in Reigate two core catchments (Zones 1 and 2) is reasonably strong at 52% to 57%, and Reigate is the most popular location in its "home zone". However, Crawley also exerts strong influence over comparison spending patterns in the Reigate catchment and the town retains only 18% of clothing/footwear spend within its home catchment.

5.28 As with Redhill, spend retention in the convenience sector in Reigate's two closest zones is strong at between 76% and 82%. The town has also improved its retention of local spend from 42.6% in 2006 to 50.2% in 2016. This is particularly driven by Morrisons, which is identified as being overtrading.

5.29 Overall, Reigate is considered to have a comparatively strong trading performance in convenience and comparison sectors, has a broad range of A3/A5 food & drink operators and is considered to be comparatively less vulnerable as a retail destination given its high-end, niche focus.

### Summary

5.30 Given the size of the town centre units in comparison to the national threshold and the current performance and vulnerability of the town centres – particularly in terms of existing leakage of local expenditure and the additional competition which is likely to be brought about by major developments in adjoining borough's (notably Croydon and Sutton) – it is considered necessary to introduce a lower, local retail impact assessment threshold.

## Determining an appropriate threshold

### Approach

5.31 In order to determine an appropriate threshold, the following have been considered:

- The point at which lost trade is likely to begin impacting upon the viability of centres, using vacancy targets as a proxy
- Average retail store sizes within existing centres

In addition, and as a reality check, recent retail development proposals and common retailer store formats/sizes have been overlaid onto the analysis above to help identify the suitable threshold levels for the borough.

### Using the vacancy target as a proxy for viability

5.32 The Council monitors its Core Strategy through significant effects/ contextual indicators. In the Core Strategy Monitoring Framework, the Council sets a vacancy target of 5% and 7% for the town and local centres respectively; vacancy levels beyond this and – by inference – the level of trade being lost as a result, is considered to be unhealthy and potentially detrimental to the viability of the centre. These targets reflect long-term trends in vacancies across the various town/local centres.

5.33 This premise can therefore be applied as an indication of the potential size of edge/out-of-centre store which might similarly draw an unhealthy or adverse level of trade from an existing centre.

5.34 As shown in Table 14 below, across town centres, the 5% vacancy target suggests that a loss of trading floorspace of more than 380sqm in convenience sector and 540sqm in the comparison sector could begin to be harmful to the vitality and viability of the centre. By inference, a competing out of centre unit of a similar size could likewise be harmful to vitality.

5.35 For local centres, the analysis has been based on retail floorspace as a whole rather than broken down into comparison and convenience. This indicates that on average across all of the local centres, a loss of trading floorspace of 123sqm could begin to threaten the viability and vitality of the average local centre.

**Table 14: Potential threshold using the vacancy target as a proxy**

| | Total floorspace (sqm) | 5%/7% of total floorspace (sqm) | Average floorspace per centre |
|---|---|---|---|
| **Town Centres (4 centres)** | | | |
| Convenience | 30,123 | 1,506 | 377 |
| Comparison | 42,903 | 2,145 | 536 |
| **Local Centres (18 centres)** | | | |
| Retail (A1-A5) | 31,646 | 2,215 | 123 |

### Average retail unit sizes

5.36 The second piece of analysis is to look at the average size of existing retail units. This provides an indication of the nature and scale of retail which currently exists in the borough's centres. This approach was used by Swindon Borough Council in preparing their recently adopted Local Plan and the principle of basing a threshold on average unit sizes has therefore been endorsed through the examination process.

5.37 For the town centres, Table 16 details that the average comparison store in the primary frontage is approximately 230sqm and convenience 700sqm. Excluding very large supermarkets/superstores/department stores (i.e. over 1,000sqm), reduces the average unit size in the convenience sector to approximately 260sqm (Table 17).

**Table 15 Average Town Centre Store Size (All Occupied Primary Frontage Units)**

| | Comparison (sqm) | Convenience (sqm) |
|---|---|---|
| Reigate | 134 | 1,218 |
| Banstead | 104 | 424 |
| Redhill | 404 | 803 |
| Horley | 210 | 622 |
| All Town Centres | 227 | 692 |

**Table 167 Average Town Centre Store Size (Occupied Primary Frontage Units less than 1,000sqm)**

| | Comparison (sqm) | Convenience (sqm) |
|---|---|---|
| Reigate | 134 | 221 |
| Banstead | 104 | 192 |
| Redhill | 251 | 324 |
| Horley | 106 | 276 |
| All Town Centres | 160 | 259 |

5.38 Table 18 shows that the majority of the units within the borough's town centres are less than 1,000sqm. In the comparison sector, over 80% of units are less than 250sqm and, in the convenience sector; over 50% are less than 250sqm. On this basis, an out-of-centre store of greater than 250sqm could have a competing effect as it would introduce a product/unit size which is not commonly available within town centres.

**Table 178 Typical Unit Size (Occupied Primary Frontages)**

| Unit size (sqm) | All town centres | |
|---|---|---|
| | % of comparison units | % of convenience units |
| <100 | 41.3 | 34.9 |
| 100-249 | 40.7 | 16.3 |
| 250-499 | 11.0 | 18.6 |
| 500-749 | 5.2 | 7.0 |
| 750-999 | 0.0 | 7.0 |
| 1,000-2,499 | 0.0 | 7.0 |
| 2,500+ | 1.7 | 9.3 |

5.39 Local centres typically have smaller, more neighbourhood scale stores. In order to calculate the average size of a unit the local centres have been grouped. Table 19 shows that the average comparison retail unit is 90sqm and convenience 107sqm. Both round to 100sqm.

**Table 18 Average Local Centre Store Size**

| | Total (sqm) | Average unit size (sqm) | Rounded (sqm) |
|---|---|---|---|
| Comparison | 5,272 | 90 | 100 |
| Convenience | 3,089 | 107 | 100 |

## Retail development proposals and retailer models/formats

5.40 A reality check ensures the impact threshold derived reflects the reality of development proposals in the retail sector and the types of formats which retailers operate.

5.41 Table 20 details the recent planning applications for convenience retail for both town and local centres. Excluding the large town centre regeneration permissions*, the planning permissions range from 28sqm to 528sqm with an average of 177sqm.

**Table 19 Recent Convenience Planning Permissions**

| | Convenience net sales area (sqm) |
|---|---|
| 41 Walton Street, Walton on the Hill | 528 |
| L/A 10 Walton Street, Walton on the Hill | 123 |
| Shell Garage, Brighton Road, Burgh Heath | 68 |
| 70 Brighton Road, Lower Kingswood | 41 |
| Trinity House, London Road | 286 |
| Sainsbury's, London Road* | 1,894 |
| Former Liquid & Envy, Redstone Hill* | 208 |
| Redhill Railway Station, Princess Way* | 1,814 |
| Former Iron Horse Public House, Bletchingley Road, Merstham | 260 |
| Shelvers Hill Store, Shelvers Hill, Tadworth | 118 |
| Citygate Mini Dealership, The Avenue, Tadworth | 140 |
| 1-3 Slipshatch Road, Reigate | 28 |

5.42 In practice, convenience stores have market models ranging from a 200sqm net sales store (equivalent to small basket store such as Sainsbury's Local or Little Waitrose) through to a discounter of 1,000sqm (Lidl/Aldi), a supermarket at 2,000sqm (Tesco, Sainsbury's, Morrisons) and a superstore/megastore starting at 5,000sqm+ (Tesco Extra, Asda superstore).

5.43 Based on the nature of the borough's centres, it is considered that even the smallest scale convenience stores (e.g. basket stores of 200-250sqm) could bring about a threat to vitality and viability. This is particularly the case for the borough's small scale local centres which are fundamentally geared towards local convenience needs in terms of their offer and could therefore be disproportionately affected by out-of-centre proposals. Indeed, retail impact assessments have been sought and provided on a number of small scale out-of-centre convenience store proposals recently (e.g. 14/01344/CU and 15/00041/CU).

5.44 In the comparison sector, unit sizes and operator formats are generally more varied than in the convenience sector. However, in broad terms, new town centre retail units will typically fall within three main categories: large size units (LSU – 1,000sqm+), medium size units (MSU 500-1,000sqm) and small units (SU – up to 500sqm). Conversely, out of town retail warehouse format comparison units typically range from 650-1,000sqm. Based on the nature of the borough's centres – and in particular the more limited availability of units over 250sqm in the comparison sector – it is considered that units approaching the upper end of the small units category could bring a threat the vitality and viability, competing for modern/national retailers which might otherwise locate within a town centre.

## Conclusions

5.45 Having considered national guidance and local data it is felt that the national 2,500sqm threshold for retail impact assessments is too high taking account of local circumstances, with potential adverse effects on the borough's town and local centres likely to be felt from developments significantly below this.

5.46 The Council's vacancy targets for town and local centres (5% and 7% respectively) can be seen as an indicator of the point at which lost trade and footfall (owing to units being vacant) may become harmful to vitality and viability. Using this as a proxy suggests that – for proposals affecting our town centres – a c.380sqm for convenience proposals and 540sqm for comparison proposals might be appropriate. However, for local centres – which are smaller and more sensitive to competing proposals – out-of-centre units of over 12sqm might be harmful.

**Table 20 Viability/vacancy proxy**

| | Comparison (sqm) | Convenience (sqm) |
|---|---|---|
| Town Centre | 540 | 380 |
| Local Centre | 120 | |

5.47 Using average existing retail units as a proxy – following the Swindon Local Plan example – would suggest a significantly lower threshold in the comparison sector (c.200sqm mid-point). For the convenience sector, excluding large supermarkets/superstores, the average unit size suggests a threshold of around 260sqm. Unit sizes on local centres are significantly smaller at an average of 100sqm.

**Table 21 Typical Unit Size**

| | Comparison (sqm) | Convenience (sqm) |
|---|---|---|
| Town Centre | 160-230 | 260-690* |
| Local Centre | 100 | |

*Upper end of range includes units over 1,000sqm

5.48 Based on an assessment of local retail planning applications and retailer formats, it is considered that even small format basket stores within the convenience sector could have a harmful impact on smaller local centres. Units of this type are typically around 250sqm of sales area. In the comparison sector, the size and format of units is more fluid; however, taking account of the profile of units currently available in the borough's centres – in particular the limited availability of larger units - it is considered that new stores approaching the middle or upper end of the small unit (SU) category could begin to have an adverse effect on the vitality and viability of existing centres.

5.49 Taking all of the above into account, the following thresholds for seeking retail impact assessments are recommended:

- Convenience retail: proposals of 250sqm or above
- Comparison retail: proposals of 150sqm or above

- All other town centre uses: proposals of 2,500sqm or above (consistent with the national threshold)

5.50 Where the end retail use is unclear or the operator/retailer is unspecified, the impact assessment should be based on the lower of the two thresholds.

# 6. Summary of Recommendations

## Frontages, shopping areas and boundaries

### Town Centre Frontages

6.1 The Borough Local Plan designates primary frontages for all town centres and secondary frontages for Redhill and Reigate. After an examination of the current uses and planned uses, amendments to the frontages are proposed:

- Horley: Primary frontage extended southwards on Victoria Road to include the newly developed Russells Square and planned retail developments at 71 Victoria Road.
- Redhill: Secondary frontages proposed on the station site and former Liquid & Envy Night-club to reflect retail permissions.
- Reigate: Re-designation of the existing secondary frontage as primary frontage. Designation of the parades immediately abutting the newly proposed primary frontage along Upper West Street and Bell Street as secondary frontage.

### Town Centre Shopping Areas

6.2 The Borough Local Plan designates primary shopping areas for all the town centres in the borough and secondary shopping areas for Redhill and Reigate.

6.3 National policy no longer specifies the need for secondary shopping areas and therefore it is proposed that this designation will not be carried forward. Retaining the primary frontage within primary shopping areas with secondary frontages beyond would not be a significant change to policy.

### Town Centre Boundaries

6.4 The Borough Local Plan designates a town centre boundary for Horley and relies upon other designations (such as town centre business areas and primary shopping areas) to delineate boundaries for the other town centres.

6.5 Town centre boundaries have been proposed for Banstead, Redhill and Reigate and due to changes in use (both actual and proposed) amendments are proposed to the Horley boundary.

## Policy approach: managing uses in town centre frontages

6.6 The 2005 Borough Local Plan seeks to maintain:

- Minimum 80% occupancy for Class A1 retail across each alphabetised primary frontage in both Redhill and Reigate, 75% in Banstead and 70% in Horley
- Minimum 66% occupancy of Class A1 retail across each alphabetised secondary frontage in Redhill and Reigate.

6.7 It is proposed that within the primary frontages proposals for non A1 use will be supported provided the A1 percentage is above 65% in Banstead and Redhill, 70% in Reigate and 55% in Horley.

6.8 Where a proposal would result in the proportion of A1 frontage falling below the relevant threshold, it is proposed that permission should only be granted where the proposal is for an A3 use in Horley or Redhill and would not bring about an overconcentration of such uses in the vicinity. In all other cases, the unit must have remained vacant for at least a 6 month period and evidence must be provided:

- 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.

6.9 Within secondary frontages it is suggested that proposals for non A1 use will be supported provided the A1 percentage is above 55% in Reigate and 40% in Redhill; or where a proposal would result in the proportion of A1 frontage falling below the relevant threshold, permission should 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. Permissions for A2-A4 or D2 uses in the secondary frontage should be considered more favourably than other uses.

## Policy approach: retail impact assessments

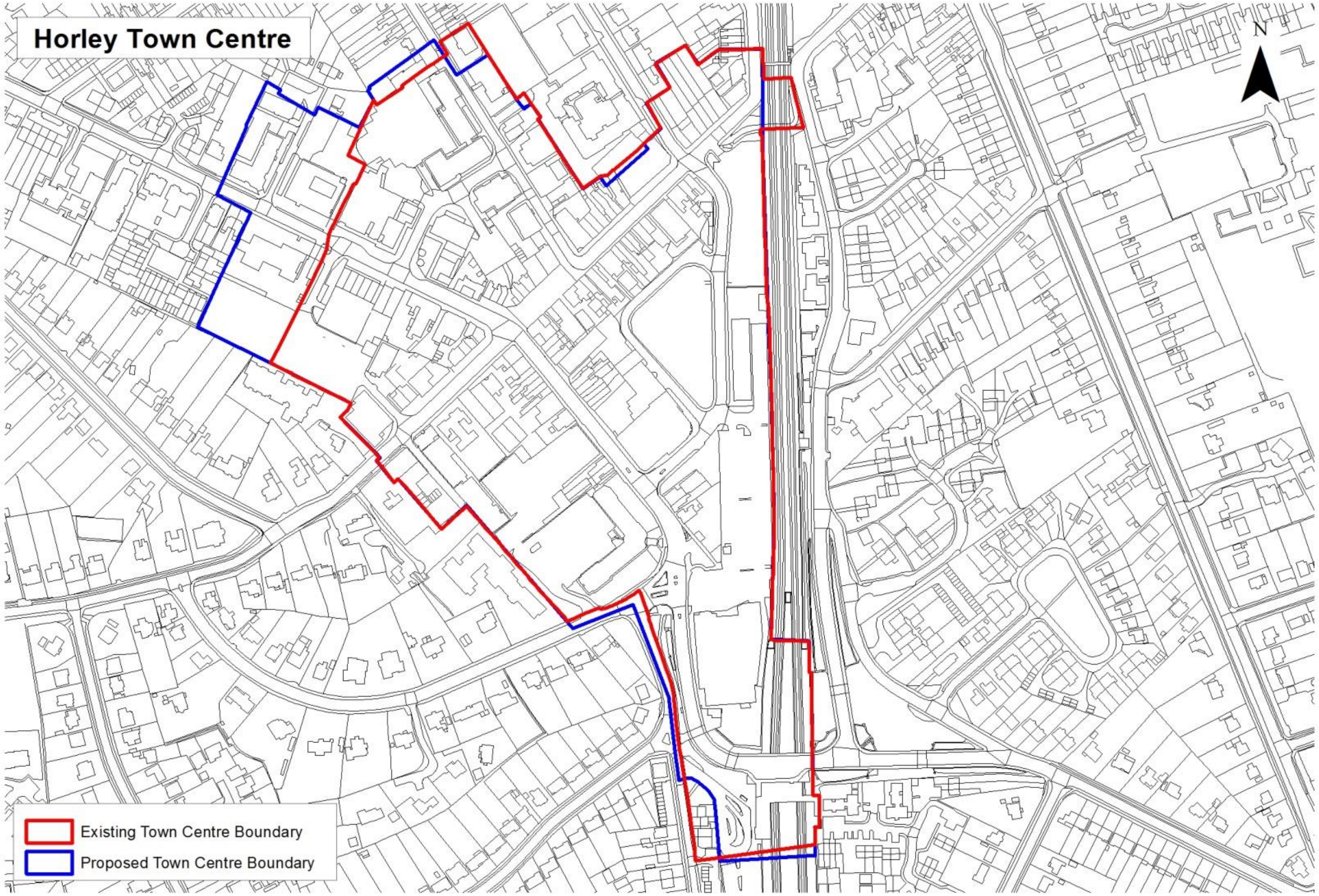
6.10 The NPPF sets a 'default' threshold requiring impact assessments for development proposals for retail, leisure and office developments of over 2,500sqm outside town centres where not in accordance with a Local Plan.

6.11 This assessment concluded that the default threshold was not suitable for the borough and instead proposes thresholds of:

- Comparison retail: 150sqm
- Convenience retail: 250sqm
- All other town centre uses: 2,500sqm (national threshold)

# Annex

## Annex 1: Horley Town Centre Boundary

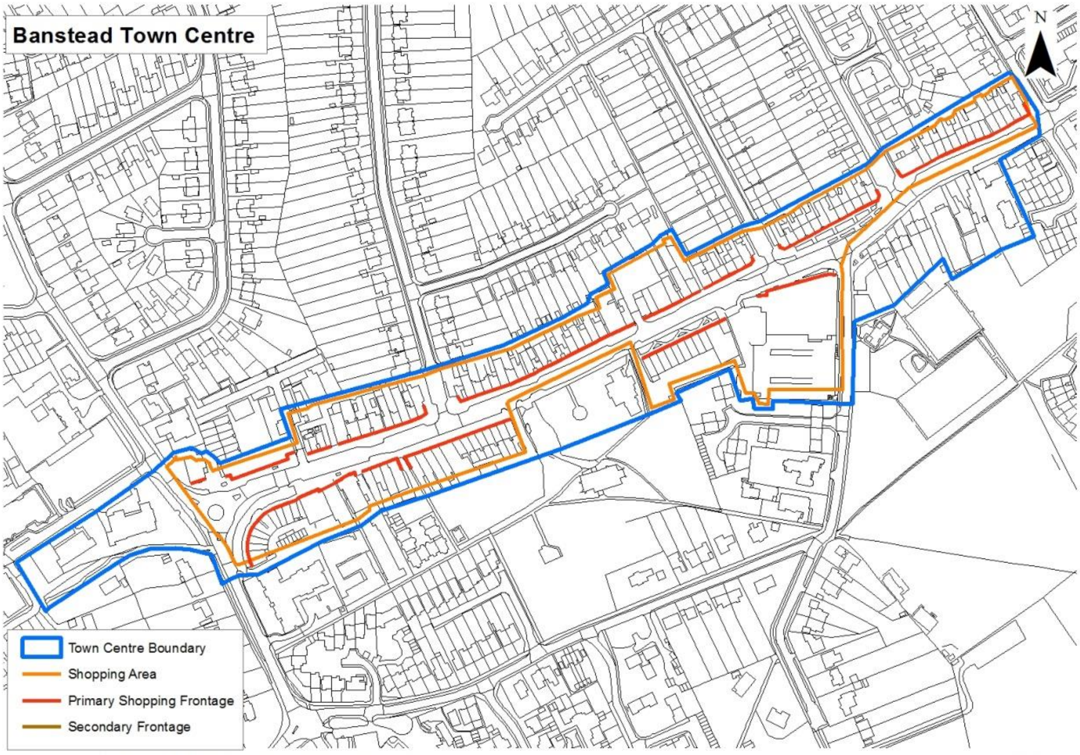





Scale 1:1,600

# Annex 2: Town Centre Maps

## Banstead

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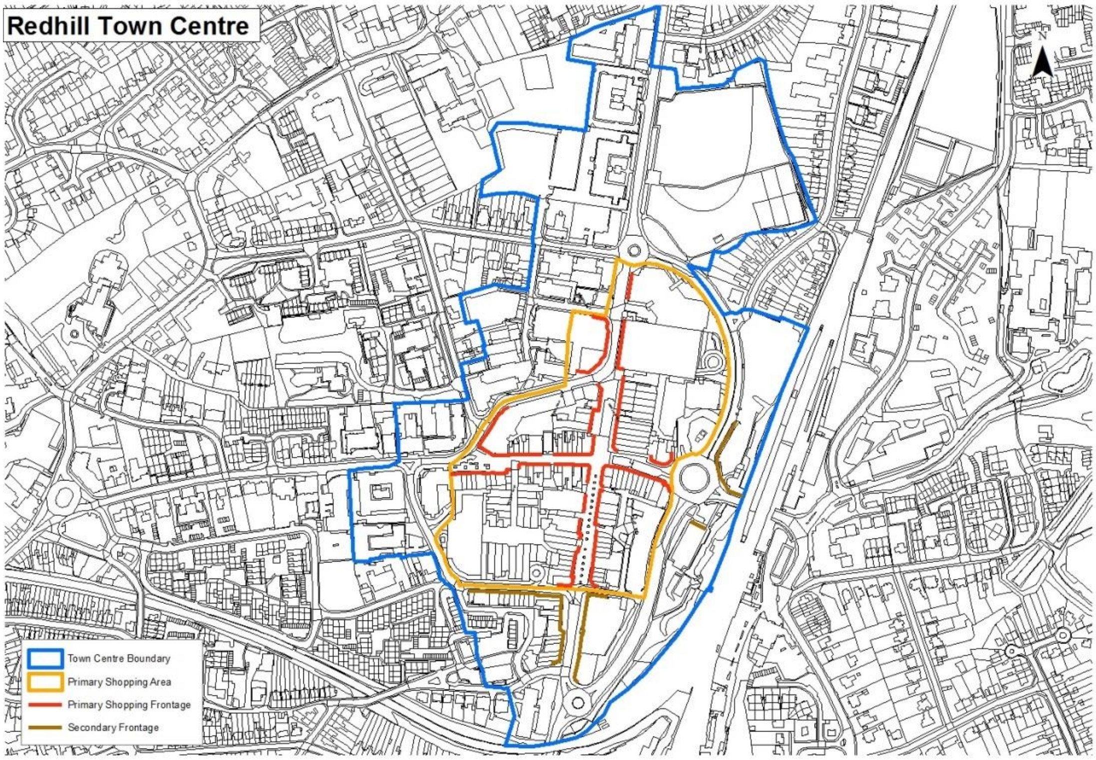
## Redhill

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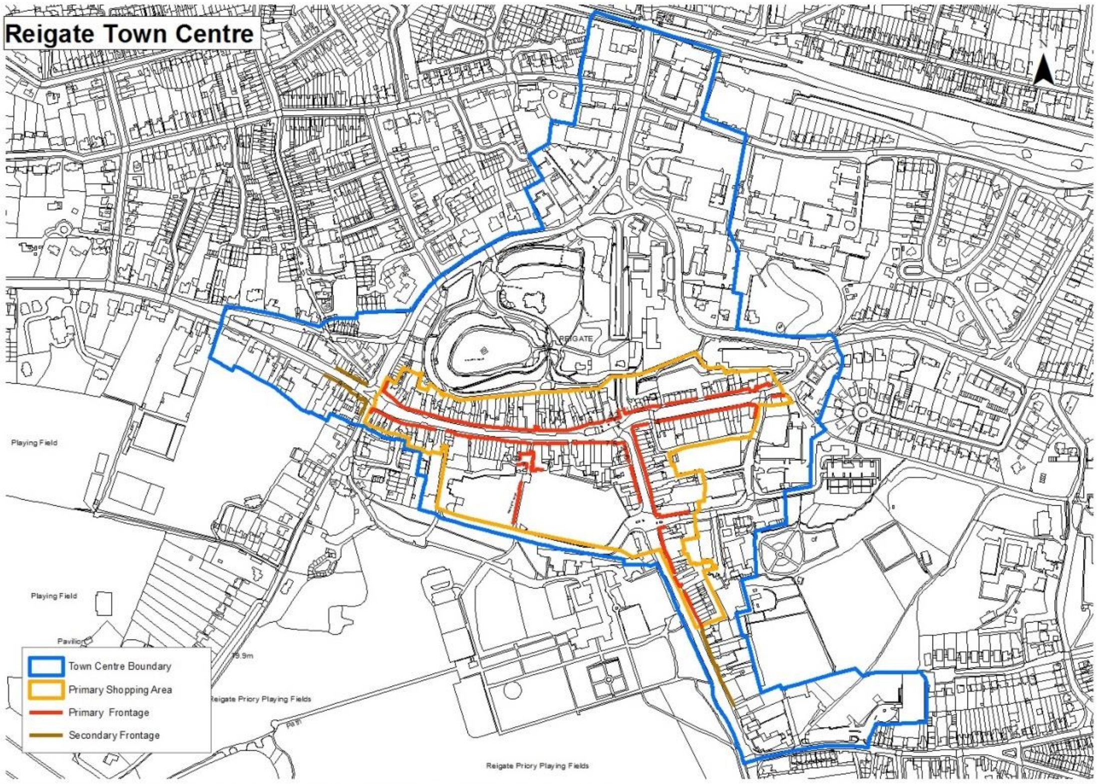
## Reigate

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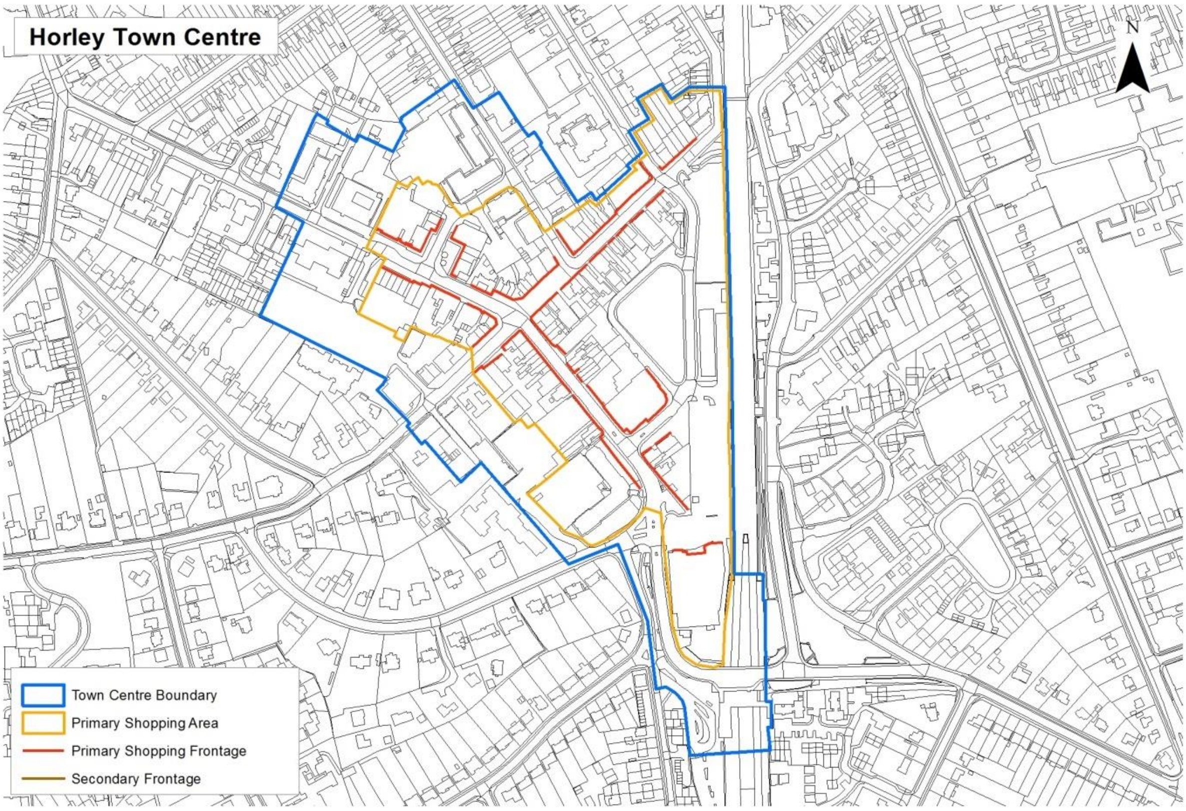
## Horley

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