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By email: planning.applications@reigate-banstead.gov.uk

PRIVATE AND CONFIDENTIAL

Dear Sirs,

**Reigate Priory Junior School, Bell Street, Reigate RH2 7RL
Request for Pre-application Services**

Please find enclosed a pre-application submission made on behalf of the Department for Education by LocatED ('the applicant'), for the re-focussing of the Reigate Priory Junior School ('Reigate') within its grounds, and the potential re-use of the Priory building for alternative uses, including any potential heritage-led alterations.

LocatED is a government-owned property company with the responsibility to acquire, manage and dispose of sites on behalf of the Secretary of State for Education. It has been tasked to explore the options for retaining Reigate within its existing grounds.

At present, the Priory building (which is part Grade I listed and Scheduled Ancient Monument ('SAM', and part Grade II listed) is used as the Reigate Priory Junior School (years 3 - 6). The building which is well-known to Council Officers, is an extensive group of different styles but it is unsuitable to meeting the modern demands of current teaching practices. Given the heritage constraints, it could not be re-modelled to provide an acceptable school environment.

The layout of the building has inefficient circulation space including single sided corridors, and non-compliant stairs. There is currently no lift provision in the building and much of the space is either not needed or could never be used. These challenges could not be overcome to provide a satisfactory level of accommodation. The level of design intervention is not possible or would cause significant heritage impacts. Consequently, LocatED has been considering alternative options to deliver a solution which is sensitive to this important site.

LocatED originally looked at two alternatives, which both require the removal of the poor quality 1950s block on the northern boundary. These would enable the original Priory building to be re-used for an alternative use, which is more appropriate and respects the heritage value of the property.

The two Options for were:

1. New 3 storey building on the 1950s site with the top floor in the roof
2. New 2 storey building on the 1950s site with a split site second building within the grounds

The challenge with Option 2 was the introduction of built form on an open part of the site within the Green Belt, closer to the Priory Building and partly within Flood Zones 2 and 3. All of these considerations make this Option a High Risk in planning terms.

LocatED has therefore concentrated on the redevelopment of the 1950s site and how to integrate this in design and heritage terms (Option 1).

This solution leaves a new use to be found for the Priory Building. As part of this pre-application process, we are also suggested how proposed new uses could be incorporated within that space.

1. Pre-application Submission

In support of the pre-application meeting request, this letter is submitted with a pre-application form, a draft Heritage Impact Statement prepared by P.S. Planning & Heritage, and a Transport Feasibility Note prepared by Motion.

Architectural drawings prepared by Architecture Initiative are provided the following link due to file size https://architectureinitiative-my.sharepoint.com/:f:/p/paul/Em7r6Q_VdHtDjHnhlpCqWDcBo2WvvMybQ7g7iFhQxjzCgw?e=4ufMxN

As well as available as individual drawing files, all of the drawings have been grouped into two files for ease of reference:

- Combined School Drawings
- Combined Reigate Priory Drawings

An animation from Architecture Initiative showing the proposed new school building is also provided in the above link.

The proposed school comprises circa 3,100sqm floorspace. The effect of these proposals would make the existing priory buildings (3,411sqm) available for an alternative use – the proposed use being as sheltered housing units/assisted living apartments or retirement (age restricted) apartments.

The requisite pre-application fee will be £850 + VAT as this will be a 'Smallscale Major proposal' (1,000-10,000 sqm) plus site visit, and will be paid by our client. The Council's pre-application service includes a meeting with Officers and written follow up advice.

2. Site and Surroundings

The site adjoins the Reigate Town Centre and Primary Shopping Area in a highly sustainable location. To the east of the building, Bell Street is a part Primary and part Secondary Shopping frontage and includes a number of services and shops. The area is of mixed character both in terms of use and built form. To the north of the building, beyond the parameter of the Park, lies the Morrisons supermarket and Wider Primary Shopping Area. Priory Park borders the remainder of the site, with the playspace attributed to the School located to the west of the building.

The site is a 12 minute (0.6 miles) walk north to Reigate Train Station. Lesbourne Road Bus Stop (Bus routes 32, 420, 422, 430, 433, 460, 622 and 820) is located 120 yards to the south-east of the building which provides access to Sutton, Guildford, Merstham and Epsom areas.

The school is currently comprised of two main buildings: the partly Grade I listed Priory buildings including the Scheduled Ancient Monument, and a part single/part two storey 1950s block to the north of the site.

The site sits within the Metropolitan Green Belt (the boundary of which forms the northern boundary of the site). The site can be considered to be 'previously developed land'. The site is positioned within Priory Park, which constitutes the former grounds of Reigate Priory and is on the English Heritage Register of Historic Parks and Gardens, Grade II. Within Priory Park is an Areas of High Archaeological Potential or of Archaeological Importance. A public right of way runs to the north of the Priory building and south of the 1950s block. The eastern element of the site sits within Reigate Town Centre Conservation Area.

The building is partly located within the Environment Agency's Flood Zones 2 and 3.

There are a number of mature trees within the grounds of the Priory, which are protected. The proposals would require the removal of one tree, whilst further arboricultural work is required to 'thin-out' some of the areas – a positive benefit even without the new scheme.

3. Planning Policy Context

Reigate and Banstead Borough Council's development plan is currently comprised of "saved" policies from the Borough Local Plan (2005), the Core Strategy (2014), and Development Management DPD (2019).

The current Development Plan shows the following designations within the site:

- Metropolitan Green Belt;
- Reigate Town Centre Conservation Area;
- Grade I Listed Building;
- Grade II Listed Park;
- Scheduled Ancient Monument; and
- Site of High Archaeological Potential.

As well as policies set out in the National Planning Policy Framework 2019 ('NPPF'), the following strategic policies of Reigate and Banstead Borough Council's Development Plan are pertinent to the determination of any future planning application:

Reigate and Banstead Core Strategy (2014)

- Policy CS1 (Presumption in favour of sustainable development)
- Policy CS2 (Valued landscapes and the natural environment)
- Policy CS3 (Green Belt)
- Policy CS4 (Valued townscapes and the historic environment)
- Policy CS5 (Valued People and Economic Development);
- Policy CS7 (Town and Local Centres);
- Policy CS12 (Infrastructure Delivery);
- Policy C13 (Housing Delivery); and
- Policy C14 (Housing Needs of the Community).

Reigate and Banstead Development Management Plan (2019)

- Policy DES1: Design of new development
- Policy EMP3 (Employment Development outside Employment Areas);
- Policy RET5 (Development of Town Centre Uses outside Town and Local Centres);
- Policy DES7 (Specialist Accommodation)
- Policy OSR1 (Urban Open Space)
- Policy NHE1 (Landscape protection)
- Policy NHE5 (Development within the Green Belt)
- Policy NHE6 (Reuse and adaptation of buildings in the Green Belt and the Rural Surrounds of Horley)
- Policy NHE9 (Heritage assets)

4. Planning History

A review of the Council's online planning search engine reveals an application which related to the main building, for the conversion of an ancillary flat to provide classroom space, demolition of external stair block and erection of new external stair block, approved on 07.01.2013 (LPA ref: 12/01658/F).

Officers found the change of use to be acceptable, and considered the replacement staircase necessary to bring the access up to a standard appropriate to gain entry to the classrooms. This was considered to constitute a very special circumstance that took precedence over any harm to the openness of the Green Belt.

Planning permission was also granted for the erection of 1.5m high railings and gates around the school, approved on 20.01.2017 (LPA ref: 16/01503/F).

5. Proposed Development

As indicated previously, the existing buildings in their current state are not fit for purpose for use as a school due to the poor circulation within the buildings. Various options for rationalisation have been explored, however there are no feasible options which include the retention of the school use within the Priory building.

Further details are provided within the submitted drawings produced by Architecture Initiative.

Option 1

The proposals are for the removal of the 1950s block positioned within the northern part of the site against the existing boundary wall, and provision of a new standalone purpose built junior school.

The new replacement block of 3,100 sqm will be set over two full levels with further accommodation in the roofspace. It also includes a double height hall, which starts at basement level.

There is a high level pedestrian link from the school into the school playground.

The proposed school would accommodate 600 pupils (years 3 - 6), the same capacity as the existing school.

The Priory Building

The proposals allow the Priory building to be 'released' to provide an alternative use appropriate to the building. Potential alternative uses include:

- A 50-bedroom hotel with ancillary uses such as function rooms, restaurant, bar and tearoom (Land Use Class C1);
- A care home with provision of 50 to 80 bedrooms (Land Use Class C2);
- Circa 30 sheltered housing units/assisted living apartments or retirement (age restricted) apartments (Land Use Classes C2/C3).

We wish to explore the merits of these alternative uses in planning terms, however it is felt that all of these would be appropriate to the heritage setting of the building, and the location at the edge of the Town Centre.

Architecture Initiative has provided proposals for the conversion of the Priory building to provide sheltered housing units/assisted living apartments or retirement (age restricted) apartments.

6. Planning Justification

Land Use Considerations

The site has an existing use as a school and so the principle of alterations to the site including removal of some elements and new build elements to facilitate continued school use is established, subject to heritage, design and technical considerations.

The proposals also free up the Priory building for circa 30 sheltered housing units/assisted living apartments or retirement (age restricted) apartments (Land Use Classes C2/C3). In planning terms, subject to justifying the removal of the school (as alternative provision is provided), the conversion of the building to C2/C3 use would be appropriate, and there are no policies restricting this. The submitted drawings demonstrate how the conversion of the building would be approached in heritage terms.

The transport advice we have received to date indicates that the use of the building for residential uses such as retirement apartments, sheltered housing and assisted living, are likely to have the least impact (of the options assessed) in terms of traffic generation and in parking provision and demand.

Heritage Considerations

As set out at Paragraph 192 of the NPPF, when determining planning applications affecting heritage assets, local planning authorities should take account of (*our emphasis*):

- 'a) the desirability of sustaining and enhancing the significance of heritage assets and **putting them to viable uses consistent with their conservation**;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities **including their economic vitality**; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.'*

Paragraph 196 states that:

*'Where a development proposal will lead to **less than substantial harm** to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its **optimum viable use**.'*

Clearly, for the reasons set out in this letter the optimum viable use of the Priory Building is not as a school use.

A draft Heritage Impact Assessment is provided alongside the proposals. This indicates that the public benefits of the proposals far outweigh the low levels of 'less than substantial harm' to the settings of the designated heritage assets known as The Priory and its registered Historic Park and Garden.

Green Belt Considerations

The site lies within the Green Belt, the boundary of which falls along the northern boundary of the existing 1950s school building (and of course the proposed school site).

Green Belt Purposes

The NPPF at paragraph 145 sets out the exceptions for new buildings which cannot be inappropriate development within the Green Belt.

Part g) states:

Limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development;
or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

Previously developed land is defined in the Annex to the NPPF as 'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure'.

Part d) states:

The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

It is our case that the proposals fall within part g) as d) fails because the proposals are materially larger than the existing building.

The question then turns on whether the proposals have a greater impact on the openness on the Green Belt.

It is considered that the new proposals do not have a greater impact by virtue of:

- the location of the site being right at the edge of the town, and with its negligible contribution to the Green Belt's openness
- the screening of the site by existing mature trees set within the Green Belt
- the position occupied between Morrisons and the Priory Building, before reaching the wider open Green Belt

For these reasons, it is considered that the proposals do not represent 'inappropriate development'.

In the event that a contrary view is taken, that the proposals do represent 'inappropriate development' within the Green Belt, then under paragraph 142, there is a need to demonstrate Very Special Circumstances. The VSC would need to be balanced against the limited impacts in this case (it is not one where the school is being placed in the central openness of the Green Belt for example) which would need to be outweighed by other considerations (Paragraph 143).

It is considered that the VSC in this case would be:

- The re-provision of an education facility for which there is a need and on its existing site;
- The re-location in part from an existing building (Priory Building) that does not provide satisfactory accommodation;
- The transfer of the period buildings into an optimum use, with its refurbishment and upkeep;
- The provision of outstanding architecture enhancing its heritage setting; and,
- The enclosure of the school use to its grounds, thereby freeing-up pedestrian routes within the park.

For the above reasons, it is held that the proposals would deliver overwhelming benefits which clearly outweigh any perceived harm to the Green Belt.

Car Parking, Refuse and Recycling

Our understanding is that the school currently maximises the amount of cars in the car park, road / path and Priory courtyard. The proposed plans identify circa 15 future spaces for use solely by the school including provision for blue badge and short stay deliveries. (13no. standard car spaces, 1no. blue badge and 1no. short stay deliveries).

24 parking spaces (20 standard, plus 4 blue badge car parking spaces) are proposed for the 30 sheltered housing units/assisted living apartments or retirement (age restricted) apartments in the Priory building.

Further details are set out in the Transport Note provided.

The proposals would incorporate refuse and recycling storage collection within the site, with details to be provided at a later stage.

7. Validation Checklist

We would welcome the Council's confirmation of validation requirements to support a full planning application for the proposed development. With reference to the Council's Validation Checklist it is held that the following would be required:

- Application Forms
- Application Drawings
- Planning Statement
- Design and Access Statement
- Heritage Statement
- Archaeological Desktop Study
- Landscape Visual Impact Assessment
- Landscape Proposal
- Transport Statement
- Framework Travel Plan
- Flood Risk Assessment and Drainage Strategy
- Tree Survey and Arboricultural Implications Assessment
- Air Quality Assessment
- Noise Assessment
- Land Quality Assessment
- Ecology Assessment
- Energy Statement
- Utilities Assessment
- Computer Generated Images

8. Pre-application Advice Sought

Based on the foregoing our client is specifically seeking Officer opinion on:

- The intensification of the site from two land uses;
- The overall quantum, scale and form of the indicative development proposed in terms of design, heritage, and Green Belt matters;
- The pertinent planning policies that officers consider relevant;
- The likely supporting plans and documents necessary to register a full planning application based on the national and local validation checklists e.g. Design and Access Statement; and
- Any other matters considered relevant to the proposals.

9. Summary and Conclusions

To summarise, the Priory building has significant limitations for school use as it does not provide appropriate circulation or teaching space.

The two proposals are for the removal of a poor quality 1950s block and its redevelopment to either 3 or 2 storeys. Each building is designed so as to complement the Grade I and II listed buildings and SAM, and to minimise impacts on openness of the Green Belt. The 2 storey option requires a separate building to meet the floorspace requirements.

Both proposals also free up the Priory building, to be refurbished and converted to provide an optimum use to secure its long term security, and contribute to the vitality of Reigate Town Centre.

In summary, it is held that the proposals comprise a well-considered and very high quality scheme which respects and enhances the heritage value of the site. It also complies with all national and local policy, including in respect of heritage and Green Belt matters.

Yours faithfully,



John Cutler
Associate Planning Director
National Planning and Development