

Reigate and Banstead Borough Council

DEVELOPMENT MANAGEMENT PLAN REG 18 CONSULTATION AUGUST 2016

RESPONSE FROM EAST SURREY GREEN PARTY

Below you will find our response to the detail of the Regulation 18 Consultation on the Development Plan. This response has been written with input from East Surrey Green Party's two local councillors, our members and residents. Green Party members, including councillors, have hosted one public meeting and attended meetings of local interest groups as well as formal consultation meetings for councillors.

We don't accept that this target now requires us to build on the Green Belt and produce a developer/landowner-led plan, that reflects the desire for profit from the countryside around our urban areas. Instead we can be more creative in increasing the density and improving the way we provide for homes in the urban area. We believe that we can still choose whether to have a plan that proposes to build on the greenbelt, or one that does not require this. Instead we propose that development, even with the agreed (higher than we considered appropriate) agreed housing targets should be directed to continue to improve our town centre and ***regenerate and increase urban areas with higher density: better towns in the Green Belt and Surrey countryside, not building out, around our towns.***

It is important first, however, to address flaws in the overall aims and vision of the Council's proposals for our Borough. We note:

- That the present consultation is based on the Core Strategy document which was formally adopted in 2014. The Core Strategy includes a target to build 460 homes per year in the Borough. This projected 'need' is based on the continuation of the South-East and London-centric development strategies of successive governments.

East Surrey Green Party believes that our Council should resist this strategy, which is focussed on continual economic growth in the South East rather than meeting the real needs of our local communities. Instead of continually building in the South East, 1) investment and building should be more evenly spread throughout the UK, and 2) homes in our area should be built to meet local need, and therefore be affordable on local wages. The Council may consider the housing numbers 'case closed', but we would be seriously letting down residents were we not to note here the flawed premise on which the housing numbers are based. We continue to hope for a more enlightened national approach to planning which directs growth to those areas that badly need it, and takes the heat off the overcrowded South East.

- That the Council does not include any detailed climate change policy, or specific criteria to ensure that local development is sustainable and minimises

environmental impact, in its proposals. This breaches the Council's own stated aims and principles, and commitments made by the UK government. Instead we propose the Council develop and consult on policy in this area, drawing on best practice from across the UK¹

Sustainable proposals would not only oppose continual building as unsustainable in itself, but would insist on guarantees that anything built

- 1) is readily accessible via sustainable means of travel;
- 2) seeks to minimise use of virgin resources and materials in construction;
- 3) is built with the explicit aim of minimising carbon footprint in construction, running and maintenance, with explicit minimum standards set for any development;
- 4) does not cause harm to, and where possible has a positive impact on, local eco-systems, wildlife and biodiversity; and
- 5) allows residents the means by which to grow local and sustainable food through community farms, private garden space or allotments.

- The current proposals centre on housing and employment and retail floor space, without setting out how the essential infrastructure needs of the proposed increase in resident numbers will be met, with a number of sites formerly used for community benefit (such as youth and community centres, adult education centres) proposed for future use for housing. A sustainable and equitable policy would not focus on continually-increasing shopping as the primary activity of local residents, but instead show how sustainable local businesses which encourage the conservation of resources, for example by repairing or sharing goods, will be prioritised over the 'national retailers' the Council wishes to attract to the Borough, which will not add local distinctiveness or character to our retail centres. The Council should also clearly set out how vital community services such as public transport, education, health and social care, and facilities for social and community activities, will be provided for the future number of households proposed.

¹ Further information will be available when the TCPA's *Effectiveness of local climate change policy* report is released towards the end of 2016. This will provide an assessment of how spatial planning is being undertaken to address climate change and analyse what is happening at the local level across England. For any queries, please contact Isobel Bruun-Kiaer on Isobel.Bruun-Kiaer@tcpa.org.uk

Theme 1. Growing a Prosperous Economy

Section 1. Economic Development.

We appreciate the need for housing but are also concerned that a number of sites which provide cheaper units for small businesses which are proposed for residential development. We need to retain space for small and new businesses, especially as these are more efficient than larger ones for delivering jobs.

Permitted development.

Currently permitted development rights allow office to residential conversions across the borough. However, this is not considered in the housing numbers (windfall allowance). This change was introduced in September 2013, after the Core Strategy had been written. This additional housing, which is estimated in the plan as 250 homes over the plan period, through an enhanced windfall figure of 25/year, should be factored into the DMP, and will reduce the number of units to be delivered on other sites.

Proposed policy EMP4 to include reference to live-work developments (p20)

Employment land is still required and less is proposed to be safeguarded in the plan. Sites proposed to switch from employment use to housing include the Hockley Business Centre in Hooley Lane, Redhill. These areas should be encouraged as live-work development areas. This could encourage start-ups of new enterprises. A combination of industrial units and housing is proposed on Albert Road North Industrial Estate but it is not clear this is a mixed use, live-work development. This could be reflected as a Borough-wide policy in EMP4.

Section 2. Town and Local Centre

As the Retail Needs Assessment of 2016 considerably reduces the additional retail floor space likely to be required in the plan period, we are surprised that there have not been reductions to the targets set out in the Core Strategy.

In particular, the evidence shows there is no quantitative need for more convenience space based on the Needs Assessment Update in 2016 and neither is there a need for extra retail warehousing. There is therefore no need to allocate sites for it.

This constrains the opportunity for sites to be considered for alternatives in the plan. For example, site RED8 is an example where the policy of tall buildings interacts with mixed uses so we would argue it provides an excellent opportunity for higher high density housing up to say eight floors with scope for retail or commercial space at ground floor level on the main road frontage. The notion of retail warehousing with surface parking is not feasible at this location and best practicable uses will be largely residential. Therefore, we don't want to see this, or other additional sites, allocated for retail warehousing.

Proposed policy RET3 (p30)

We suggest that this should also include Brighton Road, just south of Redhill town

centre, which has retail frontage stretching south from the Garland pub, and then opposite the junction with Brook Road and also around the junction of Brighton Road with Hooley Lane/Garlands Road, including at the south-east end of Garlands Road.

Proposed policy RET4 (p37)

This could also recognise the value of retaining single, stand-alone shops, which provide a significant benefit, even when they are the only retail premises in an area. For example the single or last remaining shop in an area should be afforded protection by this policy. Therefore an addition d) should be included, to strengthen the protection of the last (lone) shops in residential areas.

Theme 2. Building self-reliant communities

Section 1. Design, character and amenity.

Proposed policy DES2 (p49) Back garden land development

In 1d) delete 'and where possible', to read "retain mature trees and hedges and other significant existing landscape features..."

Proposed policy DES6 (p61) Delivering high quality homes

'Quality' must encompass design for future climate – mitigating greenhouse gas emissions and resource use, as well as adapting to future changes. It must also relate to housing need – which is for more affordable homes. We therefore suggest this policy be renamed: 'Delivering high quality, sustainable and affordable homes'.

The provision of outdoor amenity space set out in (f) could be aided by undercroft parking, and increased cycle parking as set out below.

Proposed policy DES7 Self and custom build (p62)

We note that a policy supporting self and custom build homes could improve the deliverability of smaller sites, which are often more expensive to bring forward than larger ones. Some of the smaller sites considered not to be viable in the evidence underpinning the DMP could be reversed through such a policy. Therefore, this policy could have a direct effect on whether there is a build on Green Belt and countryside land in this plan period.

For this reason we consider it inappropriate that the Council has left this policy until the Regulation 19 consultation. This policy should be written and consulted on prior to the Regulation 19 consultation, together with consideration of additional sites that might be suitable for this, such as previously overlooked, particularly smaller, sites in the previously developed urban areas of the Borough. This could include:

- development over clusters of garages (e.g. 5-10 unit developments)
- retrofit of first floor and above, such as above retail frontages in town centres and local retail centres.
- mixed use, life-work schemes in sustainable locations (such as retaining the low-cost independent retail provided along Brook Road in Redhill, while providing accommodation in this location).

Proposed policy DES8 Construction management (p64)

Please consider widening this policy from a focus on construction management alone to include subsequent repairs and maintenance.

Similar standards for construction management should be applied to maintenance and improvements of existing dwellings.

Proposed policy DES9 Safeguarding against the effects of noise, air and light pollution and remediating contaminated land

Developments in areas affected by noise should require triple glazing to make them 'liveable'. The policy should set an appropriate standard for such properties, such as Code Level 6 or Passivhaus construction, including passive or mechanical ventilation so that these homes are designed to be lived in without windows opening for ventilation, or differential thermal conductivity (such as from triple glazing combined with poor insulation) to prevent 'sick building syndrome'.

This should apply to:

- many of the sites in the plan close to railway lines (RTC3, RED1, RED2, RED3, RED8 in the Redhill area)
- for sites affected by aircraft noise
- and should be considered in town centre locations (e.g. RTC1, RTC2, RTC4, RTC5, RTC6 in Redhill).

The proposed design to address noise pollution in DES9 should be extended to relate to intermittent noise as well as average noise contours.

The proposed measures to address poor air quality should include building design measures to reduce indoor air pollution in areas that are in AQMAs, adjacent to main roads or other sites likely to have higher air pollution. Thus, in addition to external measures (noted as 4a) and b)) measures should be included to reduce exposure to air pollution inside (i.e. higher insulation and ecological building design quality, and associated mechanical/passive ventilation systems). This should be added to the policy alongside the measures listed as a) and b).

Proposed policy DES10 Control of advertisements and shop front design

The remit of this should include activities of landlords/letting agents for both commercial and residential properties and require advertisements to be removed once dwellings have been let. In some blocks of flats it is common for 'to let' boards to be permanently in place, including when there are no vacancies. This should be written into the policy and made enforceable.

Section 2. Open space and recreation

We note that the term Urban Open Space is now used instead of 'urban open space' to reflect a national change.

Proposed policy OSR1 (p69)

Item 2a)iii) should be extended to state that this should not be allowed where the resulting sports and recreation provision is less than the national guidance on minimum playing field standards, and that urban open land with ecological diversity

and tree cover should be replaced like for like, in line with the requirement to preserve or improve biodiversity associated with planning changes (such as reflected in NHE2).

Proposed policy OSR2 (p70)

We understand this is broadly consistent with the national playing field standards. Please can the Council confirm that this standard is in line with or exceeds national standards?

Section 3. Transport, Access and Parking.

TAP1 Access, parking and servicing

We understand that 1)b)iii) includes access for full-sized refuse vehicles, and this is covered under the phrase 'service vehicles'. It is important to ensure that new developments can be accessed to our standard-sized vehicles so that more properties do not need servicing by smaller vehicles, costing the Council money. If necessary, can this wording be strengthened to ensure it is as strong as possible so this requirement can be upheld at planning appeal if necessary?

Is 1d) enforceable? Please review wording, including whether the phrase 'wider sustainable transport network' is defined clearly enough. For example, can it be clarified to mean bus routes and existing cycle paths?

We note that 2) includes the phrase 'likely to generate significant amounts of movement'. What does this mean, and can it be upheld at appeal? Is it possible to define this more clearly?

Proposed additions

We propose the following additions to policy TAP1:

Safeguard strategic transport sites.

We note that good practice is for transport networks (which in this case should include cycle and pedestrian networks and routes, bus routes, train routes, transport interchanges) to be designated clearly and for development to be planned strategically in ways that lead to more sustainable transport networks and routes, not frustrate future transport improvements. We therefore propose an additional policy 3)d) 'Initiatives to safeguard sites for strategic transport developments and interchange'. We consider that this should include at least:

- **Bus station expansion in Redhill.** This should enable and include plans to improve and extend the bus station, as was intended when the current bus station was developed² as a temporary 5-10 year improvement. This timescale

² The report to the Council Executive on 27 September 2007 said: "the preferred lay out will comprise a central concourse design, which meets the Council's original aspirations identified above. However, this option requires the use of a portion of land belonging to a third party. It will remain uncertain for a number of weeks whether the Council will be successful in obtaining permission to use this land and therefore it is envisaged that the Council may, as a contingency plan, submit two planning applications... An alternative scheme is currently being developed, which does not require the additional land. It is anticipated that this will fall short of meeting original aspirations but could

would lead to the bus station site being improved in the current LDF process, but no details are included in the DMP; and

- **Improved rail connectivity at Redhill/North Downs Line improvement.** Electrification and capacity enhancement of the North Downs Line is one of the top five strategic transport investments set out in strategic transport plans for the South East drawn up by Councils and four local enterprise partnerships (LEPs). This is reflected in item 7, Annex 2 of the Coast to Capital LEP strategic economic plan report to Reigate and Banstead Borough Council (Executive, 20 March 2014, Item 8) and the report *Missing Links: How better South East transport links can improve UK economic potential?* (South East England Councils, January 2016). The latter states (p17) that this would include a £40m – £60m flyover at Redhill. The location is not stated, but we assume it is the RED8 site identified in the DMP. Development at this location should not preclude this from going ahead.

Undercroft parking

We suggest that a policy be added to prioritise undercroft parking at all developments of 12 units and above. This could increase the density, as well as the liveability of new developments. It could also help facilitate the release of new sites for development, as set out in section 3 below.

Standard for cycle parking

The standards for car parking set out in Annex 4 are based on assessments of different levels of accessibility. However, this classification has only been considered to determine the level of car parking. It could also be used to determine the minimum amount of secure cycle parking. We propose a **cycle parking standard**, requiring minimum standards for secure cycle parking for all new residential developments, and general (not necessarily secure) cycle parking standards for workplaces. This should be higher in locations classified as more sustainable locations. Exceeding the minimum cycle parking standards in high and medium accessibility sites should be acceptable as an alternative to meeting the minimum car parking standards for such sites.

Green Travel Plan

We propose an addition to this policy requiring developments above a certain scale (to be defined – and would be different for workplace, retail, residential and community uses) to be required to provide a Green Travel Plan. The detailed requirements for this should be set out by a Supplementary Planning Guidance.

potentially deliver some improvements to the bus station.” (<http://www4.reigate-banstead.gov.uk/aksreigate/images/att3522.pdf>)

The report to the Planning Committee (5 October 2007) stated: “these improvements are intended to have a lifespan of 5-10 years, as the longer-term future of the bus station and the strategy for bus services in Redhill will be determined by a number of factors including the emerging Redhill Town Centre Action Area Plan and potential development proposals for the Warwick Quadrant and nearby sites.” It later states, “it is intended that the wider regeneration of Redhill to be guided by the emerging Local Development Framework will identify an appropriate long-term solution that meets the demands of projected users and responds to Regional Planning Policy.”

Section 4. Climate change resilience and flooding

Firstly, we propose deleting the word 'resilience' from the title to read 'Climate change and flooding'. Resilience is generally concerned primarily with *adaptation* to climate change, of which increased flood risk is one aspect due to the impact of climate change on rainfall patterns. However, action to address climate change should also *mitigate* its impacts through both higher standards for new development and retrofit measures to improve the sustainability of the existing built environment – as reflected in objective SC8 and wording following proposed policy approach CCF1.

Proposed policy CCF1

We do not accept that it is adequate to omit a policy on climate change and rely on the limited specific references climate elsewhere in the proposed set of DMP policies. We propose that the Council review best policy practice from other Councils and consult separately on this policy (alongside other policies not detailed at this stage) prior to the Regulation 19 consultation.

Proposed policy CCF2

The future flood risk in some areas will be affected by how development elsewhere in flood catchment areas, including upstream, affects current and future flood risk. This should be reflected in the policy. For example, it is noted that:

- Current estimates of flood risk in Redhill do not appear to have modelled the impact of an end to dewatering and increased run-off associated with future completion of landfill operations off Cormongers Lane east of Redhill,
- Flood risk in Redhill may also be impacted by the dewatering of the Mercers Farm mineral site east of Redhill. It is not clear if the impact of dewatering of this large and deep site via Glebe Lake into the Redhill Brook has been considered as part of flood risk assessment for Redhill.
- The flood impacts of the Watercolour development, which is partially constructed in the flood plain were not accompanied by measures that the increased flood risk in this area.
- Development in the rural surrounds of Horley (under construction, with planning consent, and included in this DMP) may have an impact on the extent to which other sites flood.
- Potential future expansion of hardstanding at Gatwick area (either taxiways and other smaller scale improvements, and/or an additional runway) could impact on flooding of existing/proposed development sites.

These wider flood impacts should be considered as part of a wider strategic evidence base supporting the DMP. This should be reflected in the evidence base for Redhill, and the knock-on impact of development in the floodplain on other sites should be considered.

Section 5. Protecting the natural and historic environment

We understand the Area of Outstanding Natural Beauty (AONB) review for Reigate and Banstead by Natural England has been delayed due to a lack of resource, and is in a queue, due to be undertaken after Suffolk Coast and Heaths AONB – likely in

2018 at the earliest. Therefore, we note that the DMP is likely to be submitted to the Planning Inspectorate before this evidence base is completed.

We note that a preliminary review was carried out, funded by Surrey Hills AONB to inform landscape appraisal, and recommends where the AONB should be considered for extension. We note that this review recognises the Greensand Ridge Line as important from Burstow to Bletchingley. As this landscape feature is recognised, it should also be protected *as a feature* into Redhill, which includes the Hillsbrow site which is of similar landscape quality to that identified.

Proposed policy NHE1

We propose that item 3a) be extended to say 'landscape character and landscape feature(s) of the locality'.

And we propose an addition: 3g) Ensure the protection of ancient and veteran trees.

We propose the DMP includes links to the latest maps of AONB and Area of Great Landscape Value (AGLV) for the Borough.

Proposed policy NHE2

We welcome the protection and enhancement of the Reigate Escarpment Special Area of Conservation (SAC), Biodiversity Opportunity Areas (BOAs), Local Nature Reserves (LNRs), Sites of Special Scientific Interest (SSSIs), Sites of Nature Conservation Importance (SNCIs) and Regionally Important Geological Sites (RIGSs). For clarity we propose the DMP includes a map showing the locations of all these designated areas in the Borough and explains how site allocation has been conducted to protect and enhance these areas.

Proposed policy NHE3

The DMP should include a map that shows the areas of ancient woodland – as well as areas previously ancient woodland that are required to be restored after working minerals.

Proposed policy NHE4

The consultation document states that this policy “would be supported by a Green Infrastructure Strategy and Action Plan”. These are not included in the consultation. Please confirm that the Green Infrastructure Strategy and Action Plan will be consulted on publicly prior to the Regulation 19 consultation, so that changes to this, and to NHE4, can be reflected in the Regulation 19 consultation version of the DMP.

Contributions must be obtained to fund green infrastructure from developers/owners of schemes, as with other forms of infrastructure, to support biodiversity, recreation and play, etc, and this green infrastructure must be managed in perpetuity rather than simply through a landscape maintenance contract.

Proposed policy NHE5

The section relating to extensions or alternations to buildings in the Green Belt should also consider impact on the openness of the Green Belt (as is the case proposed for replacement buildings).

The phrase 'to support the rural economy' is unclear. The reuse and adaptation of buildings to support the rural economy would require redevelopment to residential use to be accompanied by continued commercial or industrial use on the site, such as in a 'live-work' development. The proposed policy (2) under 'Reuse and adaptation of buildings in the Green Belt' could have a detrimental effect on the rural economy, the opposite to the intention stated.

Theme 3. Place Shaping.

This theme is called 'Place Shaping' but does not set out clearly what is meant by these words. We propose that explanatory text, and a policy setting out the key principles for successful place shaping, are included at this point.

Section 1. Gypsies, travellers and travelling showpeople

The estimates of gypsy and traveller numbers suggested in the evidence base should be consulted with the Surrey Gypsy Traveller Communities Forum (<http://www.sgtcf.uk/home/>)³ and the organisation Friends, Families and Travellers (www.gypsy-traveller.org), and also verified against statistics of the number of gypsy and traveller children in education in Surrey. In this way the provision of housing by Reigate & Banstead can be closely coordinated with County Council and health services.

Section 2. Cemetery and crematorium provision.

We propose that cemeteries should be considered in terms of their benefits as sites which often have high nature conservation and biodiversity potential. We also propose that the policy includes provision of sites for woodland burials.

Section 3. Potential development sites.

General comments

Affordable housing

We note that in Reigate & Banstead, the average house price is £426,207 and the mean annual earnings £32,935, a ratio of 12.9:1. The income required for a mortgage here is £97,419. This is a serious crisis and the DMP must address it. (Info from Homes for Surrey campaign www.homesforsurrey.org.uk)

The Borough is not delivering anywhere close to its plan requirement for affordable housing. In 2015/16 just 15.2% of the total housing delivered were classified as

³ Which promoted this evidence collection exercise on its website.

affordable, and only 8.5% were properties available for rent at affordable rents. An updated Affordable Housing Supplementary Planning Document (SPD) is required to address this shortfall both against the target, and against local need. These should also be subject to consultation before the Regulation 19 consultation takes place as the policy approach taken for affordable housing will impact the viability and deliverability of some sites. Consultation should include all registered social landlords operating in Reigate and Banstead and the campaign group Homes for Surrey.

All residential development on publicly-owned land should provide at least the minimum amount of affordable housing designated in the Council's SPD.

Windfalls

We understand that the maximum number that the Government accepts is currently 50/year. This is low compared to what has regularly been delivered in the borough. We note that a figure of 75/year is used in the Reigate and Banstead Housing Monitor.⁴

On this basis we propose that the Council should request that the government approve a higher figure from permitted development, and survey office landlords so that the most likely office-to-residential conversion sites are included in the SHLAA.

Density

The DMP considers low, medium and high density as 20, 30 and 40 dwellings per hectare respectively. However, the latest Reigate and Banstead Housing Monitor shows this as conservative, with 42% of homes built and 64% permitted having higher density than the 'high' density in the plan. If the definition of high density was increased, at least to reflect current delivery rates, it could result in more sites being in the plan than needed. The change in parking requirements need not affect this deliverability, should a policy on undercroft parking be added as noted above.

Figure 13 Density of Completions 2015/16

| | Less than 40dph | 40-60dph | 60-100dph | More than 100dph |
|-----------------|-----------------|----------|-----------|------------------|
| Number of Units | 338 | 56 | 48 | 145 |
| Percentage (%) | 57.6% | 9.5% | 8.2% | 24.7% |

Figure 25 Density of New Permissions

| | Less than 40dph | 40-60dph | 60-100dph | More than 100dph |
|-----------------|-----------------|----------|-----------|------------------|
| Number of Units | 238 | 71 | 39 | 316 |
| Percentage (%) | 35.8% | 10.7% | 5.9% | 47.6% |

Source: RBBC 2016 Housing Monitor

⁴ It is anticipated that at least an additional 137 dwellings will be delivered from office-to-residential conversions over the next five years (27 per annum). On this basis, an additional allowance of 125 dwellings (25 per annum) is included as part of the windfall allowance within the five year supply. (RBBC Housing Monitor, 2016).

Some of the higher density areas (such as in central Reigate) are for roads with terraced housing. This should be considered, as an option for master-planning which (for the sites illustrated) appears to be of relatively low density (20-40 dwellings per hectare).

Green Belt

Up until 2015 most development on the Green Belt has been resisted. It increased from 0.4% to 16.6% of planning permissions granted in 2015/16 (65 units), due to the permission granted for on the RNIB site in Philanthropic Road, Redhill, which accounts for all of these 65 units (RBBC Housing Monitor).

Comments on individual sites

'Sustainable Urban Extension' sites east of Redhill

The three identified 'Sustainable Urban Extension' (SUE) sites to the east of Redhill have high environmental value and should be protected, not built on. These three sites are highly visible, being seen from far and wide. They form part of the landscape feature that runs unbroken to the east, and is elsewhere designated as AONB and AGLV.

Also, the proposed sites are not served by regular bus services (frequency along the A25 is limited compared to the A23) and the distance from the train station means that future residents of these areas are likely be car dependant, as evidenced in the walking time map included in Annex 4. Therefore these sites appear to be relatively unsustainable locations according to the criteria listed in Annex 4

Finally, the transport assessment for these sites is based on Surrey County Council estimates of expected delay times on the A25 (Redstone Hill) following introduction of the two-way balanced network road layout round Redhill. However contrary to the predicted impacts, the A25 regularly suffers peak-time delays, which sometimes continue past the Tandridge border. The SUEs, if built, would be likely to further exacerbate congestion. In non peak-times, when the mean speed is generally above the 30mph speed limit, these sites may not have safe access.

For these reasons, as well as the site specific concerns set out below these are considered inappropriate locations for development.

ERM1 – Land at Hillsbrow.

The Hillsbrow site south of the A25 is part of the Greensand Ridge a prominent, often wooded, escarpment which runs to through Sussex, Surrey and Kent. Parts of it are in the South Downs National Park, the Surrey Hills Area of Outstanding Natural Beauty and the Kent Downs Area of Outstanding Natural Beauty. The part running east of Redhill into Tandridge has no less natural beauty than these other, protected, sections.

This section of the Greensand Ridge appears as a well wooded ridge when seen from the north or south, even though at Hillsbrow – the highest point of the Greensand Ridge within our Borough, the belt of trees at the top is very thin. This photo is taken from inside the North Downs Ridge AONB. Views from the AONB must be protected. Building housing along the north slope up to the top of the ridge would destroy the landscape feature of a wooded ridge line.



[Markers show Hillsbrow (between the blue arrows), Redhill Common (green arrow centre) and Reigate Priory Park (green arrow right). The part marked by a green line is AGLV. The red hatching is left on the photo from a previous use and unfortunately indelible. It covers woodland of similar appearance to the rest of the ridge.]

An earlier planning application for 93 homes on this site was widely opposed by residents and refused on the following grounds. Grounds 1–3 are no less true now.

1. The proposed development would constitute inappropriate, and therefore harmful, development within the Metropolitan Green Belt ... and
2. The proposed development by reason of the scale, height and density of the buildings would result in a form and character of development that would be markedly different from the nearby urban fringe. Such contrast of development on the countryside fringe would be out of keeping with and detrimental to the character of the area.
3. The proposed development is adjacent to or would affect trees and woodlands that make a significant contribution to the character and amenity of this locality.
4. Failing to provide a contribution to infrastructure, to secure affordable housing and impact on flood risk in the locality.

This significant landscape feature should not be built on. It has already suffered from mineral extraction and was not restored to woodland as required by the planning conditions imposed. Both local and national plans require mineral sites to be fully restored. The designated land use is therefore still woodland, however it is currently being used as a commercial recreational use.

This site should be restored, not developed in ways that permanently sterilise areas previously identified for restoration to woodland. Development of this site conflicts with NHE3 in this regard. It also conflicts with the stated aim of the Nutfield Ridge & Marsh Enhancement Project, which Reigate and Banstead Borough Council supports.

ERM2 and ERM3 – Land west of Copyhold Works and Former Copyhold Works

The Copyhold site and adjacent field, to the North of the A25, is a site of nature conservation interest (SNCI). This means the local council is tasked with protecting and improving the site and its nature conservation value – not building on it.

These two sites are also part of the Holmesdale Woods Biodiversity Action Area (BOA) that runs east of Redhill. This means if this is lost it must be compensated for elsewhere. Yet compensation has not been proposed. Development of this site is also in conflict with proposed policy NHE2.

These two sites are also both part of the Surrey Waste Plan. Part of the Copyhold site is required to be restored to countryside and green field status but a small amount of land is identified as a site for non-thermal waste treatment. Alternative provision within existing industrial areas, such as Holmethorpe industrial estate could conflict with current uses (and high level of occupancy) of this area. The field site is included in the Surrey waste plan as a buffer between potential use of this site and existing homes. Such a buffer is not only needed in the future, it is needed now – the nearby landfill site is still in operation and causes frequent smell and dust problems to residents.

Finally, the site boundary is shown incorrectly. The northern edge of the site is now woodland and contains a cycle route which is part of the National Cycle Network. This should be retained. This area was historically used for allotments; instead of housing it should be used to increase allotment provision close to central Redhill (where a lot of housing without gardens or outdoor amenity space has been recently completed, has planning permission or is proposed in the DMP).

The remainder of the site currently consists of restored grazing, following landfilling. This has ecological value (including bats and badgers) and should be developed as part of the planned Biodiversity Opportunity Area, with woodland, and leisure use.

South Park sites

Like the proposed SUEs in Redhill, the distance of these sites from regular bus services (the current South Park provision is a stopping service, and limited frequency) and the train station makes them an unsustainable location for urban extension. Similarly the walking time map included in Annex 4 identifies them as unsustainable locations. These sites should therefore also not be considered for urban extension.

SSW2 – Land at Sandcross Lane, South Park. This Green Belt site does not appear to have a clearly defined boundary. This calls into question why the sites and site boundaries elsewhere have been chosen and defined – it would appear that man-made features (road boundaries) have driven planning rather than natural features. This site also reflects the same lack of consideration given to ecological, landscape and biodiversity aspects (as well as sustainability of transport access) for the sites east of Redhill. The area to the west of the small stream looks illogical for inclusion, as the stream would provide a more natural boundary to development,

which could be strengthened through tree planting to form a clear natural boundary to this site.

Other sites

BAN4 Netherne on the Hill

If this site is taken out of the Green Belt as proposed, is it anticipated that additional homes will be built here? This is unclear. Is there a site Masterplan or Supplementary Planning Guidance?

RTC1 Marketfield Way/High Street, Redhill

This sits within an area of Redhill designated as 8+ storeys. A maximum guide height (and number of storeys) should be included in the DMP and this development accord with that policy.

RTC2 Cromwell Road

There was previously a much more comprehensive scheme, including an Asda supermarket, for this site and a wider area. Development of a wider site should be considered at this location.

RTC4 Colebrook, Noke Drive, Redhill

This should include provision to safeguard the plant nursery and 'office project' building currently used by Surrey Choices for continued community use, and exclude these areas from residential development. The ground floor of this or the RTC5 site should be allocated for community use.

RTC6 Gloucester Road Car Park, Redhill

The principle for development of this site is supported, for residential use preferred.

RED1 Quarryside Business Park

The development of this site should consider continued provision of community/SME space as a live-work development as well as of dwellings. This would be consistent with the initial plan for development of the Watercolour site, which included a community centre and some industrial units (now superseded by housing at the Kilns). This combination of uses would enable a more intensive development without a proportionate increase in the level of parking provision required.

RED3 Hockley Business Centre

We would prefer that some commercial/industrial units are retained at ground floor level. The site should provide safe pedestrian and cycle access that links to the path along Brook Road. A higher standard of insulation should be required, in part to reduce the impact of train noise, and therefore improve quality of life for residents.

RED7 Redhill Law Courts

There should be wider consultation to identify the best site for a school. While we prefer this site to the proposal to build a school on the Copyhold site in the Green Belt (as proposed in the DMP), other sites should also be considered, such as Gloucester Road Car Park.

RED8 Land at Reading Arch Road

A higher standard of insulation should be required, in part to reduce the impact of train noise, and therefore improve quality of life for residents. The site should be planned in such a way as not to sterilise the future provision of a Redhill flyover in association with electrification of the North Downs Line (see above). A higher residential density maybe considered for this site.

RED9 East Surrey Hospital

We do not support the removal of this site from the Green Belt but propose that a strategic 10 year Health Provision Strategy should accompany the Core Strategy. Currently East Surrey Hospital is a key healthcare site, and health care has been more centralised with the (historic) reduction of services at Crawley Hospital and proposed reduction of services at St Helier. Recent developments at East Surrey Hospital have tended to be reactive, in response to shortage of beds, and of modular construction one to two storeys high. Rather than removing the site from the Green Belt a strategic approach should be taken. This should include architectural guidance for the site (the DMP proposes a SPD for masterplanning for other Green Belt sites, so why not this one) and consideration given to a maximum height of three storeys (still lower than the existing chimney) and improved landscaping around the site boundary and car parking areas.

REI2 Land adjacent to Town Hall

This is more appropriate for residential use than retail as it is outside Reigate town centre. The access to the Surrey Choices use (which was used to justify the end of use of Colebrook in Redhill) should be sustained.

HOR9 Land west of Balcombe Road, Horley

We do not support the proposal to build a large employment centre consisting of business space, predominantly in office use, and commercial and leisure facilities on this greenfield site in the Rural Surrounds of Horley.

We do not accept the 'need' for this development when there is plenty of unlet office and industrial space within the Gatwick area, and when the Council is proposing changing a number of other sites from employment to residential use.

We support the Keep Horley Green Campaign and endorse the arguments made in their submission.

We support the principle of putting land around Horley into the Green Belt, including this site, and working to conserve and improve its landscape and wildlife value.

Section 4. Infrastructure to support growth

The title for this is inappropriate. First and foremost infrastructure should be provided to ensure that developments, communities, and the borough as a whole is sustainable. This means infrastructure that meets the needs of communities to deliver a high quality of life for all, within local and global environmental limits. Infrastructure to meet these needs includes aspects such as sufficient schools, doctors, and health centre provision. This type of infrastructure should be prioritised over that envisioned to support growth.

Energy: The sustainable (renewable energy) local generation of energy, both in form of building integrated renewables and other local schemes should be considered within the plan. This should for example, set out a view on:

- where preferred locations for solar arrays would be in the borough, including a position on public sector buildings and industrial parks
- small-scale anaerobic digestion plants, which could be included as part of the rural economy at community and farm scale
- where wind turbines are preferred, both for educational purposes (e.g. in school playing fields – and at what scale) and for more significant energy generation
- the potential for landfill gas to be used to provide heat as well as electricity generation (note the generator sets that currently burn gas from Redhill’s landfill site do not capture waste heat and use this for space heating. This is understood to be for a historical issue with Network Rail not permitting a heat pipe to be installed under the railway. This should be revisited, identified as an opportunity in the plan, and considered, including potential government support for the sustainability benefits this could deliver.
- The use of wood fuel in new developments. (Gatwick Diamond Woodfuel Supply Chain evidence base, 2009) (within which Reigate and Banstead sits) has a wood fuel strategy. There is significant forested area which could be managed in ways that sustains biodiversity while providing fuel. This could be reflected in plans for rural land use in the Borough plan and provide energy generation opportunities for new and existing developments.

Transport: An improved bus service along the A25 corridor should be considered within the plan, as a route that could achieve improved commercial viability and encourage a modal shift, particularly to reduce congestion in peak hours. This could include an extension to the 100 service to Reigate.

We note that the Surrey County Council infrastructure study showed a large deficit in funding to provide the necessary transport infrastructure, including public transport and highway capacity associated with the developments proposed.

Waste: Waste management should be extended to include resource management, reuse and high value recycling. Waste sites going forward could be smaller scale, create more jobs, and should not include any thermal treatment of waste (except anaerobic digestion). This would help safeguard against current waste (or other industrial) sites in the Borough being proposed as thermal ‘energy-from-waste’ sites (incinerators), either by the public or private sector.

Green infrastructure: The plan should include provision of allotments, community supported agriculture and orchards. These should be encouraged, both in appropriate locations in the urban area to improve the quality of the lived environment, and in the immediate boundaries of urban areas.

Section 5. Managing land supply

Proposed Policy Approach: MLS1: Phasing of urban extension sites (p191)

There appears to be a word or words missing in the first bullet point under this heading on page 191 as its meaning is not absolutely clear.

We agree that urban extension allocations should be prioritised based on factors such as their relative sustainability and infrastructure impact. Sustainability should be considered both in terms of the ability of sites to support more sustainable lifestyles and communities (eg, low car use, high accessibility locations) and in terms of the need to protect landscape features, nature reserves and areas high in biodiversity.

Considering this, and reviewing the SHLAA and evidence base accompanying this DMP we conclude that more can be done to identify sites and enable viability to deliver the required dwelling number on urban sites, so that there is no need to include sustainable urban extensions in this DMP.

We consider there is rich potential, particularly around small sites including car parks, and improving viability through alternatives to commercial developer led approaches for example, self-build, housing trusts, considering Raven Housing Trust as a preferred partner for developments, and securing national funding to open up difficult sites such as former gasworks and industrial sites.

Here below we list some sites we believe are worth exploring, and we have full confidence that our planning policy team could

Alternative site proposals (450-1100+ units)

We support the Core Strategy Objective which requires development to be prioritised within sustainable locations within the existing built up area, which have the necessary infrastructure, services and community provision. But we do not agree that homes will need to be provided on greenfield sites to meet future housing needs, nor do sites need to be identified to demonstrate that the Council has a five year supply of housing land available.

We believe that there are more opportunities for residential development in town centre locations than are set out in the DMP consultation document.

The consultation document says “it would be helpful if you could suggest alternative sites, as the Council will need to identify enough sites to deliver the Core Strategy development targets” (p5) and we are pleased to help.

Below we set out a number of possible additional sites that we know, mostly in the Redhill area. We are confident that similar potential development sites can be found at urban centres elsewhere in the borough.

1. Additional Sites in Redhill Town Centre

1.1 West Central, 3 London Road

The rear of West Central is only one storey high while the main building is three storeys. The rear of this building is in a courtyard area that includes Nobel House, which is significantly higher. It could support a development combining community use (which is lacking in the Redhill town centre plans) on the ground floor and an estimated 15 dwellings above.

1.2 Extension of rear of shop buildings

Some expansion of buildings on the south side of Station Road East is currently underway. These units should be reflected as ‘planned’ in the DMP. Additional units to complete this rear streetscape could continue towards east end of Station Road East. Estimate 6-12 units.

A small number of units may also be provided in other locations around Redhill and in the other town centres. For example we note there is space to the rear of retail frontages in Bell Street, Reigate, that could be provided, with increased height, in a manner that does not affect the frontage or appearance of the street scene. Number not estimated.

1.3 Rear of Cromwell Road – Wider Scheme

The current scheme (RTC2) and adjacent development Knowles House (2-10 Cromwell Road & 35-37 High Street) are for the current footprint of buildings along Cromwell Road and High Street. There is also potential for development to the rear of the site, potentially for a comprehensive development at this location. It could also

be linked to a wider opportunity to retrofit and improve the energy efficiency of social housing units in this location. Estimate 20-40 units.

1.4 Reading Arch Road – Intensification of residential use, compared to that proposed.

We support the proposal for mixed use comprising retail with residential at the RED8 site. However, the proposal for bulky goods retail provision through extension of the warehouse area implies the need for significant parking, which would undermine the residential opportunity in this area.

The DMP proposes this site considered up to eight storeys. We would consider this to be a maximum, on the parts of the site adjacent to the railway. Such an approach could enable the site to be able to accommodate of the order of 300-400 units, together with ground floor retail and commercial frontages to Brighton Road. This needs to be designed to accommodate the future rail flyover which is proposed by Local Enterprise Partnerships and others.

1.5 Belfry Centre, Redhill

It may be possible to provide residential units above the retail frontages owned by the Belfry car park owner. Additional parking may be possible through additional height on top of the Belfry car park, together with a mixed use/residential development. Either way this split level, split use car park has poor space utilisation and could be improved. Not estimated.

1.6 North of Brook Road

We support the current uses of this site but there could be potential to develop this site to retain the current uses while adding low-cost live work units with affordable residential accommodation by extending the height of development in this area. Not estimated.

2. General opportunities for additional housing to be assessed across the borough's urban areas and included in the plan

We understand that the SHLAA is able to include any site that is developable for five or more units over the plan period. Therefore we believe additional evidence is required to identify the following cumulatively significant but individually relatively small sites.

2.1 Vacant offices in town centres

Where offices have remained vacant for a number of years these should be considered as housing sites, rather than leaving them to become windfalls which cannot be counted towards Local Plan allocations. A survey of landlords to determine the likelihood of different sites being permitted for conversion should be carried out and the sites identified included in the SHLAA. Estimate: 25 units/year over plan period.

2.2 Space over existing shops

The DMP should include a survey of current usage of all first-floor-and-above space in the main shopping centres (Redhill, Reigate, Horley) as well as in smaller retail centres identified in the plan, for example along the Brighton Road shopping parade just south of Redhill town centre.

The Plan should positively support conversion of space above shops into residential units. Some examples to consider are:

- Above Wilkinson's (Redhill) – Estimate 4-6 units.
- Above Boots block – currently two storey (High St,-Redhill)
- Above the brick-built two storey block including the Salvation Army shop (Station Rd, Redhill). Extend to 3-4 storeys. Estimate 4-6 units
- Above (or more likely redeveloping with additional storeys) the block including Barclays Bank (Station Rd, Redhill). Estimate 12 units.

2.3 Space over new shops

We note that retail frontages are generally regarded as ground floor units; new retail development therefore offers an opportunity of additional residential units on upper floors.

2.4 Redundant garage blocks

We have seen some positive schemes to convert redundant garages to housing, and Raven Housing Trust is said to be reviewing all options for garages⁵ (e.g. Arbutus Close. 40 garages to 7 houses.). This has been successfully proposed and delivered elsewhere in the Borough too. The Council should work with all social housing providers to identify the extent to which similar sites can be brought forward, while ensuring that sufficient public open space is retained in the areas concerned. Estimate. Unknown.

2.5 Replacement of estate parking with undercroft parking and flats or townhouses above

Suitable sites could exist in many different locations across the borough. An example of what this could entail is at Romanby Court, Mill Street Redhill (30 units). Estimate: unknown

3. Other urban sites

3.1 Gasometer site, Hooley Lane, Earlswood

This is currently in a non-conforming use. It is surrounded by housing in what is basically a residential area. This site could provide extra green space with additional housing. Estimated: 30 dwellings.

⁵ <http://www.surreymirror.co.uk/garages-horley-demolished-make-room-extra-parking/story-26906571-detail/story.html>

3.2 Former Territorial Army site, Batts Hill, Redhill

This site has been vacated, and the Ministry of Defence's disposal report from December 2014⁶ clearly identifies the Expected Planning Use as Housing. Yet it does not appear in the SHLAA.

Based on an estimated 0.6 ha size we estimate this could accommodate 35-40 residential units.

3.3 Donyngs car park and overflow car park and indoor bowls centre car park

More strategic development of the overall site could be considered, retaining the sports use and also incorporating housing as well as car parking.

The Indoor Bowls Club car park is under-utilised and slopes steeply. We anticipate that housing could be provided in part of this site, such as cut into the slope with undercroft parking. We estimate 20 units, townhouse style, based on around 1/3 ha of developable area.

The Donyngs car park could be reconfigured, either as split storey parking or multi-storey up to three storeys high. This would free up part of the site for housing. This offers potential for a combined scheme with housing, parking and using heat from the swimming pool as part of a district heating scheme as identified in Core Strategy policies. Estimate 20-30 units.

A survey of car parking provision in this area should be conducted. This should consider the aggregate parking demand for the indoor bowls hall, Donyngs and local shopping – in the same way that a parking study was carried out to inform the earlier development strategy for central Redhill. It is envisaged that this could lead to potential development of some/all of the overspill car park above Donyngs (Estimate: 20-40 units)

3.4 Linkfield Street/A25/Station Road Roundabout and Car Park at Donyngs

It is anticipated that a review of parking (see 3.3 above) could lead to a reduction of parking currently provided on the island car park to serve local shops. A transport study to determine turning movements from the roundabout might enable the road layout to be simplified. Together this might open up potential land for development, or alternative use in this area. Estimate – unknown, as depends on highway consultation.

3.5 Reigate station car park

This is adjacent to the Homebase building which is allocated as continued retail warehousing. We recognise that this site may be difficult to develop as housing but if a similar approach is adopted to that taken in Redhill (multi-storey station car park

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/310001/20140508_Interim_Disposals_Database_HouseofCommons_Report.csv/preview

provision, together with town centre apartments close to the station) then this car park site should be considered as a potential site for better provision of parking,

3.6 Redundant industrial building, Wray Common Road/Madeira Walk

There is a large brownfield site north of the railway line between Wray Common Road and Madeira Walk. It is within 15 minutes' walk of both Redhill and Reigate town centres, and would integrate well into the landscape. This could suit a multi-storey flatted development, similar to Clairville Court immediately to the north (23 flats) and to blocks to the west: Valley Court (seven storeys high comprising 22 flats) and Dorchester Court (five storeys).

The existing industrial building has a larger existing footprint than these developments, and could accommodate significant height due to its sunk location. Access could combine vehicular access to Wray Common Road with high-level pedestrian/cycle access to the foot/cycle path that runs from Madeira Walk to Donyngs. Estimate 30-40 units.

4 Existing Sites outside of the Urban Area

4.1 . Legal and General site, Kingswood.

We note that the Legal and General site may be vacated and has recently been bought by a residential property developer.

This 43-acre site has circa 275,000 sq. ft of office space and circa 1,500 car parking spaces.⁷ We understand that this is an existing site in the Green Belt. Therefore its redevelopment should reuse the existing built form. This could be utilised as a strategic commercial/industrial site as an alternative to the proposed Horley Business Park, if this is considered appropriate and sound – see our comments on supporting evidence – or as housing, utilising the current footprint of the development. For comparative purposes, the Cane Hill hospital site was redeveloped to provide 650 homes (77k sqm GIA) and around 7k sqm of commercial and business space⁸.

⁷ Sale particulars: <http://www.rib.co.uk/docs/investment-documents/l-g.pdf?sfvrsn=0>

⁸ http://planning.croydon.gov.uk/DocOnline/133998_1.pdf

Detailed Comments on Supporting Evidence.

1. Employment

1.1 Employment – Economic Needs Assessment

Introduction. This focuses on space needs in urban areas. Its basic methodology (figure 4) appears to predict need and provide additionality. The scenario effectively seeks to establish the number of jobs needed to align with the amount of additional labour arising from new housing (para 2.16) based on assuming 0.66 jobs per working age resident (2.18), rather than provide any vision or direction – it is primarily an indication of the scale of labour generated by new housing set out in this plan. It predicts that 5,600 new homes will require 2,600 new jobs (para 2.22).

This assessment raises five concerns, which need addressing.

1. No assessment of rural or sustainable jobs opportunity. It does not provide an assessment of the current status, or needs, of the rural economy. Nor does it provide an estimate of the jobs required to transition the local economy towards a sustainable economy, including in line with the government's carbon budgets. Rather than relying on (Experian) forecast estimates alone, we expected to see some assessment of what jobs are needed to create a more environmentally and socially sustainable economy. This should be considered now.
2. Opportunities to improve existing sites not considered. It does not review the potential to improve existing employment provision, including through energy efficient retrofit. Improving existing, including vacant, premises to encourage sustainable jobs, is an alternative to losing existing employment sites to windfall and then re-providing elsewhere.
3. No apparent match between employment and housing strategies.⁹ It is not clear from this evidence base whether there is a match between the types of jobs expected to be created and the type of housing provided. Without such an alignment, this could result in a net increase in inward migration to the Borough to work, due to mismatch between residential and employment provision, both in terms of type and location. Or, it could continue the trend of inward migration into the Borough for some types of jobs, while the housing development supports primarily people in London-based employment, with increased outward commuting.

It is important to ensure the approach taken secures the provision of homes for people working locally rather than exacerbating the commute-in-and-out scenario. This is not considered addressed in this assessment.

4. The impact of permitted development of offices and employment buildings is not considered as a policy choice but a 'windfall loss' to be accommodated. A planned approach to constraining permitted development as opposed to just

⁹ See tables 1 and 3 in the evidence base.

letting it happen is not considered in the evidence. This option should be considered and a different approach considered for the DMP.

The evidence on vacant stock (table 16) sets out higher amounts of vacant office space (9%) – estimated as around 5,000 sqm excess, compared to industrial, storage and distribution (6%). It is not clear from the study how the vacancy rates vary across the borough and how this relates to the strategic employment site considered separately (see below). On this basis it is not clear why the Council proposes to reduce the number of identified industrial areas, while the demand for industrial space is noted as increasing.

An alternative ‘keep what you have’ strategy, which focuses on less office development and more retention of industrial parks/centres does not have appeared to be considered in the DMP, which is more of a ‘preferred option’, than consideration of the different options available. We believe that such an alternative strategy should also be considered.

5. Focus on space as opposed to wider resource needs. The assessment focuses only on floor space and does not consider resource needs such as energy, water, materials, nor how employment provision should be located to build on sustainable transport modes.

For example, the proposed siting of a business park in the Horley countryside, only accessible by road from the M23, does not appear to encourage commuting to/from this site via sustainable modes (bus, train, walking and cycling).

The report is more of a forecast of continued ‘business-as-usual’ rather than an evidence base that might guide a clear vision for the Borough’s development. Such a planned approach would provide evidence that enables recommendations on how spatial planning of infrastructure, including transport, can make existing (and any new) employment locations more sustainable.

Conclusion.

For the reasons set out above, we believe the following should be addressed by the DMP:

- Existing residents’ employment needs should be a higher priority than creating jobs to attract new residents.
- The option of constraining permitted development rather than treating it as a ‘windfall loss’ should be considered.
- The needs of the rural economy and the necessity of transitioning to a sustainable economy, in part through improved utilisation of existing sites, must be considered.
- The impact of the employment pathway on the likely housing market must be addressed.
- Wider employment resource needs must be considered alongside floorspace.

1.2 Employment Area Review

This reviewed eight employment areas in the Borough. Comments are noted as follows:

- This noted the potential to expand the gasholder site in Balcombe Road, Horley. It is not clear if this is planned for during the plan period.
- Similarly, is the Aerotron site in Salfords identified as industrial space during the plan period?
- The summary for the Holmethorpe Industrial area includes the Quarryside Business Park, which is included as a housing site, but does not comment on this at all, or provide a quantitative assessment on how this would affect demand for industrial uses across the rest of the Holmethorpe Industrial area that remains (i.e. through considering the level of occupancy in this area).
- Wells Place. This states both that there is 2000sqm+ vacant and that there have been no vacancies for the past two years. Please clarify which is correct and ensure this vacancy is reflected in the plan if appropriate.

1.3 Advice on Scope for a Strategic Employment Site within Reigate and Banstead

- The title implies that there is no Strategic Employment Site already within the Borough and is misleading.

Principle points raised

- Para 2.16-2.17 identifies the need for office provision. Why is an edge of town site considered for office accommodation, rather than providing this within the urban area, or utilising the newly vacated Legal and General site.?
- The report makes no reference to a potential second runway at Gatwick Airport. Please confirm whether or not the identified 'unmet need' in Crawley is based on Gatwick continuing as a single-runway airport or whether it is based on expansion at Gatwick.
- All of the land parcels listed (para 3.8) appear to be greenfield sites. Please confirm why previously developed urban land in the South East (or elsewhere in the UK) is not considered a priority over this proposed development in Reigate and Banstead.
- The section on sustainability of employment provision (p10+) does not consider the impact on the environment or suitability of sites (e.g. flood risk), or to what extent the proposed provision is required to meet local employment needs. It is unclear why such a narrow view of sustainability has been taken, and some crucial these aspects are reduced to constraints (table 3) or ignored entirely.
- It is not clear how the selection of sites either side of Balcombe Road is consistent with the stated aim in para 3.20 to ensure that the Strategic Gap between Horley and Gatwick Airport is *maintained and protected*. How can this be achieved by building on it? The site selection approach appears to try to select the best of a poor choice of greenfield sites, without any minimum sustainability standards.

Review of Annex 1 (externally produced report)

- This proposes the Council should 'develop a new approach to wood fuel with partners' (p13). Previously the Gatwick Diamond Partnership commissioned a Wood Fuel Strategy. Is this being progressed now, and how does it relate to this scheme?
- This notes that "Proximity to Gatwick Airport appeals to businesses due to

its excellent connectivity and ready access to global markets, rather than necessarily the opportunity to service the airport and its supply chains” (p270). It is not clear therefore why the site search has led to an intensification in one location, as opposed to across a number of different sites. If this is a search for one single site, the Legal and General site near Kingswood would provide a suitable alternative near Gatwick.

- The justification for the proposed Horley Business Park development appears in part to be proximity to an airport (p31 for example). However, it is not clear why the author's of this report consider it is beneficial to increase intensification of employment in the South East, rather than the government to plan for increased employment growth to areas with much more substantial vacant employment space, such as in cities in the Midlands and North of England, thus contributing to more vibrant and self-sustaining economies across the UK.
- The claim that such a site is 'required' (p35) is an overstatement – it is desired by some, but there is a valid viewpoint that it might be better located elsewhere. The question over whether to support intensification of use of countryside in Surrey/Sussex or to make better use of urban areas across the UK is not addressed by this report.
- The Horley Business Park proposal does not appear to be a way to meet the identified existing need for employment land but to attract additional employment to the area. This 'need', or perhaps strategic ambition, was clearly identified and consulted upon in the Core Strategy process.
- Elsewhere it has been stated that this site would not drive up the demand for housing locally. This report provides no evidence to support this statement – rather it suggests the contrary: that strategic employment could lead to housing demand, rather than respond to it. The demand for housing estimated in the Reigate and Banstead Core Strategy did not include consideration of additional demand generated by such a site.
- The typology for the site does not appear to consider access as part of the criteria for site selection. This raises the concern that this strategy was written with pre-identified site(s) in mind. Consideration of sustainable accessibility as a prime driver for spatial planning appears to have been completely ignored. In its place this appears to be solely an economic assessment. Therefore, little weight would appear to be able to be afforded to this evidence, from a planning perspective.

2 Environment and Conservation.

2.1 Habitats Regulation Assessment.

We note that the consultation was based on a draft assessment, before comments had been received from Natural England. Therefore we expect that it will be consulted on once again once this expert opinion has been incorporated. Furthermore, it is not clear whether the methodology was consulted on with Natural England before it was conducted, and whether it is just the findings, or the whole report including methodology, on which a response is expected. **Please clarify.**

This report focuses on the impact of development on certain protected habitats, which, with the exception of the Special Area of Conservation running west of Reigate, are outside the Borough.

It is not clear to what extent this same approach is applied to Sites of Special Scientific Interest, ancient woodland, Local Nature Reserves, Biodiversity Action Areas and Sites of Nature Conservation Interest within the Borough, nor on protected species.

Maps showing the spatial location of similar sites setting out the location of these sites, far more relevant to considering the impact on development on habitat within this borough, do not appear have been provided as part of the evidence underpinning this DMP.

2.2 Draft sequential test for flood risk

We note that this excludes Redhill town centre, as opportunity sites for Redhill have already been sequentially tested as part of work to inform the draft Redhill Town Centre Area Action Plan (consultation draft 2011) (see para 1.3). Please confirm if this earlier assessment looked at the impact beyond 2033 when Redhill landfill site is restored (increased runoff, reduced abstraction), considers the impact of Mercers Farm quarrying (permission to discharge into Redhill Brook granted with current planning consent) and takes account of the failure of the Watercolour development to provide measures to offset its impact within the floodplain.

Para 3.14 notes that, “The two land parcels (Sites 22 and 23) identified as part of the potential strategic employment development site have areas that fall within in Flood Zone 2. However, the land parcels (when taken together) are predominantly in Flood Zone 1 so development could be constrained to just Flood Zone 1, as areas of lowest risk, which would require no further testing.” However, it would appear that an increase in hard landscaping (e.g. buildings, roofs, roads, parking areas) within a floodplain will likely reduce flood storage (including infiltration) in this area, so increase risk of flooding elsewhere (upstream or downstream). Please confirm that this wider, strategic rather than site specific, approach has been addressed elsewhere, how it has been addressed, and what its conclusions are. This also applies to the housing sites identified in the rural surrounds of Horley.

The map for Reading Arch Road (p61) looks different from the other maps. Please confirm that the same methodology has been used and the indicative risk shown on this map is comparable. We note that the flood areas shown are discontinuous rather than appearing joined explicitly to the Redhill Brook. Please that this considers a full updated assessment of the flood risk in Redhill town centre. We presume that the identified flood risk means that housing proposed on this site is first floor and above, in which case the approach taken appears reasonable.



2.3 RASC Review

RASCs appear to be mainly focused on areas of very low housing density. It is not clear why this is the case, and why other areas are not considered to have an equally 'special and cohesive character worthy of protection', such as Conservation Areas (for example the Linkfield Street area in Redhill and Chart Lane area in Reigate). Please confirm that the level of protection afforded to RASCs and Conservation Areas are similar, and if not, why not.

2.4 Heritage Strategy

The Heritage strategy (para 4.2) identifies the Borough's heritage context as comprising both manmade and natural features. This evidence identifies the Greensand Ridge as a heritage asset. This must be reflected in the DMP, both in terms of policy and site selection. This is elaborated further from para 4.6, which identifies geology and landscape character as key aspects of heritage.

2.5 Lack of Natural Conservation Strategy

While the above evidence includes a map showing the nationally and locally listed buildings and historic parks or gardens, there is no similar maps included showing the natural or landscape assets, including those of historic importance and biodiversity.

No details have been provided to show how Local Nature Reserves, Sites of Special Scientific Interest, sites of geological importance, Biodiversity Opportunity Areas and Sites of Nature Conservation Interest are to be preserved and enhanced.

Evidence for natural heritage that is worth protecting should be provided, and the strategy that underpins the selection of sites, and what is acceptable in terms of environmental sustainability and natural features clearly set out.

It is unclear how the Council seeks to have a sound consultation on development of Green Belt and countryside areas without clearly identifying the location and importance of these, except as part of the site evaluations. It appears that the site evaluation has been undertaken first, before a clear strategy on how these assets will be assessed and what loss of nature, biodiversity and conservation assets is acceptable. It is not acceptable to consult the public on the sites first, and only consult on these important policy-direction-setting strategies later – as this is not just a question of site prioritisation but whether sites should be protected.

3. Equality Impact Assessment

The combination of housing and commercial sites, how they will be brought forward (e.g. through self-build, housing associations and community organisations, local or large developers, the council and/or others) will affect the way in which these plans impact on the work opportunities and housing options available to current and future residents.

There will be an interplay between:

- employment provision (both amount and type – including the decision whether to over-provide against the Council's earlier estimate of demand); and
- housing provision (including how the location and density proposed, including site ownership models, affects the level of affordable housing likely to be delivered by the plan).

This will mean that the plan either supports the development of more inclusive and sustainable communities locally, or leads to more inflow of new residents (based on who can afford to buy/rent new dwellings delivered) and outflow of existing residents if they cannot afford to continue living locally.

This Equality Impact Assessment is very brief and describes the overall process of development management at the Borough. It does not appear to consider that the content of the DMP could have an impact on equality locally, so does not currently appear to be adequate.

4. Green Belt Review

4.1 Main document

The sites have been defined as quite significant land parcels in some cases – such as the sites east of Redhill and the larger site west of South Park. Smaller parcel sizes, following other boundaries might have been considered in some cases, such as SSW2 (boundary at stream). This would enable Green Belt ranking to be applied to different parts of a site that are less alike.

The choice of a three level ranking (lower, moderate, higher) is limited. A four or five level ranking would be preferred.

Tables 6 and 7 provide an overall summary of overall priority for Green Belt parcels, based on consideration of Green Belt criteria alone.

Finally, the overall methodology for assessment does not clearly establish what is considered 'acceptable' in terms of meeting the purposes of the Green Belt. Tables 6 and 7 appear to equate to rankings of 'moderate' to be given equal weighting to one ranking of 'higher'. The justification for this is not clearly set out.

The degree to which weight is given to this assessment alongside the aspects of sustainability set out in the Sustainability Appraisal of the sites is unclear. Therefore, the way this assessment relates to the overall prioritisation of sites, and determination of which sites should be included (in the DMP's set of preferred sites – as opposed to omitted from the main DMP document) is unclear.

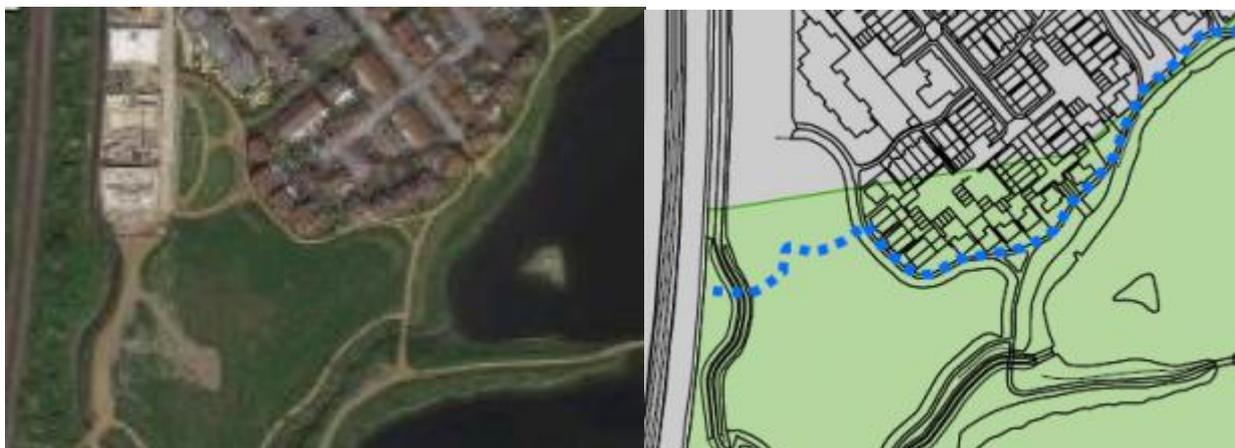
4.2 Green Belt Review Appendix 1 – Parcel Assessments

This considers five criteria for review as to these sites value in terms of Green Belt. It does not consider other aspects such as landscape, nature/biodiversity, or transport accessibility for these sites which is covered separately in the sustainability appraisal.

4.3 Green Belt Review Appendix 2 – Anomalies

Not all of these appear to be anomalies:

- The plan area for Lodge Lane (no 2) does not look like an anomaly – and it is unclear if it should a) extend past the last building and b) has a clear (natural) boundary that contains the new extent.
- Oaklands Drive (no 7) looks reasonable as it balances land removed from and added into the Green Belt, and improves openness as a result.
- Brambletye Road (no 8) looks like a proposal to reduce Green Belt boundary as a school building now extends into it. There are many school sites which have similarly been built into the Green Belt. The case for this is less strong.
- Dovers Green Road (no 10). It is not clear why this amendment has been made to include this building but not those on Ashdown Close.
- Frenches Road (no 16). This land was previously allotments and is now housing. The boundary change looks pragmatic.
- Southern boundary of Watercolour (no 17). The map does not show the full extent of current development. The new boundary proposes to include a playground (see aerial view below). This should be designated as Urban Open Space if the Green Belt boundary is moved.



- Orchard Way (no 22). It is not clear why this change should be made.
- Greenacres (no 25). It is not clear what the compensatory addition to the Green Belt is in this case.
- Withybed Corner (no 28). The justification for this change is not clear. The change proposed at the bottom of this map is also unclear.
- Wellesford Close (no Wellesford Close (no 34). It is not clear that this should be supported. No. 21, which looks similar in concept is proposed to not be supported. Therefore accepting this would appear to introduce an anomaly.
- Coulsdon Lane (no 41). This looks like an anomaly on the plan and it is unclear why this should be supported.
- Queens Close (no 45). This looks to introduce an anomaly as this is not the only building in the Green Belt in the vicinity. We do not support this change.

4.4 Appendix 3

The implication of the different reclassifications proposed for Netherne and for Babylon Lane appear to be to take Netherne out of the Green Belt, while re-inserting Babylon Lane into the Green Belt. The rationale for this appears clear, and is supported.

5 Retail Assessment

5.1 Retail Evidence

Regarding retail provision the DMP states there is no quantitative need for more convenience space based on the Needs Assessment Update in 2016 and neither is there a need for retail warehousing. It is not clear therefore why the figures in the Core Strategy for these have not been updated at this stage.

We support the introduction of the lower retail thresholds proposed in this evidence.

5.2 Retail – Local Centres Assessment

The rationale for assessing current local centres, appears to be the previous consultation. It is not clear why some areas are assessed but not others. For example, why assess the centre in Timperley Gardens but not around Earlswood Station Approach, and why assess Brighton Road, Horley but not Brighton Road, Redhill?

6 Open Space Provision

6.1 Open Space Needs Assessment

We note the evidence base provided completing an open space needs assessment for Horley, and we agree with the concept of reviewing the open space for new developments alongside that within existing urban areas.

Please confirm why a similar evidence base has not been prepared for other parts of the Borough. In particular, Redhill town centre has had and is planned to have

further substantial increase in residential accommodation. Consideration should be given to using the site ERM2 to meet open space need (allotments, recreational) to meet this growing need. This could be provided through this site being retained in the Green Belt.

6.2 Urban Open Space Review

The Urban Open Space Review does not provide details of why specific sites are proposed to be removed from UOS (previously UOL) designation, or provide maps of these designated areas. These should be presented together, and shared publicly for clarity. The rationale for removing sites should be included and opinions on these changes sought in at the next stage of consultation.

7 Sustainability Appraisal

The Sustainability Appraisal approach taken is to rate different aspects as red, amber or green – across sites and objectives. This approach would seem to be one to identify risks, but not whether the plan has maximised the **opportunities** for maximise sustainability through the proposed plan. In this regard it is considered as an appraisal of the level of risk that the proposed plans might entail, not whether the opportunities for good development is maximised, nor how unsustainable options can be avoided (through screening out or mitigation measures).

However, with this in mind our review notes that:

- The Sustainability Appraisal review of proposed objectives (Appendix D) has a number of ?s remaining in the table: 1 for objective 3, 4 for objective 8, 1 for objective 11, 3 for objective 13, 4 for objective 15, 3 for objective 16. It is not clear what this means or at what point this will be completed or addressed. It also has two red ratings for objective 5 for PS1 and PS2, and 2 red ratings for objective 8 for SC10.
- There are a lot of red ratings for the proposed strategic employment site options (Appendix H). This suggests that regardless of site chosen, the idea of a strategic employment site outside of the existing urban area is not very sustainable. The proposed sites (SEH1 and SEH2) are rated red for objectives 8 and 9 and objectives 8,9,10 and 13 respectively.
- The Sustainability Appraisal ranks SUE site as red as follows: SSW1-13; SSW3-2; SSW4 5,13; SSW6-2,4,11,15; SSW8-2; SSW9-13,16; ERM1-7,8; ERM2 - 7,8,11,12; ERM3 – 7,8; ERM6-2,9; EH1-4,15; EH2-4,15; EH3-4,15; NWH1-4,15; NWH2-4,15; SHE1-4,8,9,15; SEH2-2, 8,9,10,13,15; SEH3-2,4,8,9,10,13,15; SEH4-2,4,8,9,10,15; SEH5-2,4,5,8,9,10,13,15; SEH6-1,4,11,15; SEH7- 2,4,11,13,15; SEH8-1,4,11,13,15; SEH9-1,4,11,13,15; SEH10-4,5,11,13,14,15; SEH11-4,5,7,11,13,14,15; SEH12- 4,5,7,8,9,11,12,13,14,15. It is not clear how this information has been used to inform which sites and screened in and screened out of the DMP, and how the remaining sites will be prioritised going forwards (if these sites are required at all).
- The Sustainability Appraisal ranks urban sites as red as follows: 136-168 Banstead High Street-3; Colebrook, Redhill-11; Depot and Bellway, Merstham-6,7; Gloucester Road Car Park-11; Hockley Business Centre-6,7; Horley Library-

2; Horley Police Station-6,7; Hutchins Farm-3; Kingswood Station-6,7; Library, Reigate-2,7; Longmead Redhill-11; Maple Works, Redhill-6,7,11; Oakley Centre, Merstham-16; Quarryside, Redhill-6,7; Town Hall, Reigate-4; Orchard Bell Street, Reigate-3,5.

This suggests that there are a number of areas where the site is not sustainable. While these results are summarised in tables in the main report, few conclusions, qualitative or quantitative, are drawn.. It is also not clear what weight is accorded to the results of this Sustainability Appraisal in the DMP.

Sustainability of New and Existing Urban Areas Together

The concept of considering the total urban space requirement for new developments alongside existing urban areas should also be considered for sustainability. Thus it is not just whether developments are in themselves sustainable that is important, but how this leads to more sustainable settlements as a whole.

Comment on ‘sustainability’ of urban extensions.

We note that the Core Strategy consultation included maps justifying the ‘sustainability’ of sustainable urban extensions with circles illustrating walking time to town/urban centres. Yet Annex 4 of the DMP document just gives walking times. This shows that the previous circles included in the Core Strategy consultation were misleading, and not representative of the suitability of these locations as urban extensions. This means that the assumptions underpinning the earlier site selections were incorrect. As these areas, previously identified as ‘sustainable’ urban extensions are not very sustainable in terms of accessibility – either by foot or bicycle or in terms of bus service frequency, their choice as suitable sites for development should be reviewed.

8. Infrastructure Needs

8.1 Education

The **primary school** recommendations are summarised as:

- to explore the suitability and availability of sites in the Redhill/Reigate urban area for a new two-form of entry primary school in the short term... particularly sites in public ownership, and consider whether an allocation could be made; and
- if sites for urban extensions are allocated East of Redhill, a site able to accommodate a two-form of entry primary school (i.e. at least 0.8ha) is identified and safeguarded as part of the allocation (para 1.8).

We understand from para 2.46 that there is an expectation to provide three forms of entry of primary provision.

The assessment of need in the Redhill/Reigate catchment is supported by circumstantial evidence from place allocations this year, including households in central Redhill (e.g. Park 25) allocated spaces in Furzefield (Merstham) and Salfords primary schools.

We propose that the conclusion of this evidence could be strengthened – and a school site in the urban area be allocated as part of this plan. In addition to the Law Courts site (Redhill/Reigate borders) the Alexander Road site (South Park) and

Gloucester Road site (Redhill) should be considered. Gloucester Road might be preferable as it has playing fields to the rear, so could potentially share space with St Matthews (noting that a similar arrangement has been agreed between Reigate Parish School and Reigate Grammar School in Reigate).

As three form entries are identified for the level of Redhill-Reigate housing envisaged, we consider that a single form entry primary site could be considered as well as a two-from entry primary site. Therefore, sites considered could include smaller sites such as Quarryside and Longmead in Redhill and the former Lime Tree School site on Alexander Road in South Park. Providing two separate schools as opposed to one large three form entry school would reduce the overall travel to/from school.

We consider that the urban extension of Redhill is not the best place to provide a school, even if urban extension is considered at this location, for the following reasons:

- An urban extension is likely to have a 'bulge' of school demand as it is occupied and a school will also draw from the wider area, which could worsen congestion with travel both ways (out and back to this site on the edge of the urban area;
- Most of the need for a school is identified due to urban growth, not urban extension sites, so this could result in higher car dependency (and congestion) for the school run based if the school is in an out-of-town location.
- The requirement to release Green Belt land may not materialise over the plan period.
- A more central location in Redhill (even if for separate schools) could better serve Redhill's overall demand going forward.

For **secondary school** provision the old Albury Road site (now St Nicholas special needs school) has been widely mooted but is not mentioned in this report. It is understood that Surrey County Council has already made some infrastructure planning based on this site being allocated. It is surprising that consideration of this or other sites is not included in this evidence. Please confirm that it is included in the site allocations under the DMP.

8.2 Health

The proposal to provide additional health places as part of urban expansion is not preferred. These sites may not be required, and are on the edge of the urban areas, so do not lie centrally (i.e. maximise accessibility) within their respective catchments. Therefore, sites within the existing urban areas (as proposed in Redhill, but not in South Reigate) should be considered for the additional GPs identified as being required.

The estimate (para 1.10) suggests a requirement for an additional 35 hospital beds. This appears low for the next 11 years, compared to number of additional buildings constructed at East Surrey hospital over the past decade. The overall demand for hospital beds in the SASH area should be reviewed, including consideration of expansion of provision at Crawley and St Helier sites, and use of secondary sites such as Leatherhead, to localise some hospital bed requirements.

The removal of RED9 from the Green Belt should not include the current allowable footprint of the site (red boundary). If this allows a more efficient use of the existing site (additional storeys, reconfiguration of the overall hospital ward layout, with potential relocation of some of the temporary buildings which have provided some of the recent ward additions) then this should be considered.

8.3 Transport

This is identified as the fourth issue of this document but details of previous issues are not provided in the report. This is based on 2009 model, updated for 2014. However significant changes (balanced network and local sustainable transport project) have been completed in Redhill since this time, which have already caused changes which are not consistent with this evidence.

This is identified as a location of concern (A25, Redstone Hill- rank 4 on p40) but this is with additional development, not considering the baseline case alone. The predicted increase in this location is highlighted in Figures 4.1 and 4.2 but not in subsequent figures or as 'network hotspots'. Based on empirical evidence this evidence appears to understate the existing congestion on the A25 to/from Redhill running towards Tandridge. This should be carefully reviewed.

Therefore, the conclusions regarding the transport assessment in the Redhill area do not appear to reflect existing congestion along the A25 running East of Redhill, and should be based on empirical evidence of how the network performs now the balanced network works are complete.

This could highlight the need for:

- Changes to road layout/signals on the approach of A25 into Redhill from the East
- Benefits of including a pedestrian walkway connecting bus and train station at Redhill to reduce impact of pedestrian crossing at this location on traffic movement. This could be completed in association with the future Redhill bus station improvement, linking bridge with potential new retail over bus station site itself.

No discussion on public or sustainable transport modes is made in this evidence base. This should be included. The evidence on need/opportunity for modal shift to buses and non-motorised transport and the way in which planned Redhill station development affects the transport connectivity of sites and vice versa should be considered. Improvement of the bus station, electrification of the North Downs line, and continued improved in walking and cycling accessibility should be included in the Infrastructure Delivery Plan.

9. Housing

9.1 Housing Standards Justification

The housing standards evidence notes the removal of the Code for Sustainable Homes standards nationally, and introduction of mandatory standards for water efficiency and optional standards for accessibility and internal space. We agree with

the proposal for the optional higher level of water efficiency standards, but note that this is still lower than would have been the case before the national change.

This national policy change has reduced the power devolved for plan making locally, and has reduced the scope for taking a plan-led approach to sustainability in developments locally. National policy could change again, over the plan period and national policy guidance is now frequently updated. Therefore, the local plan should be flexible and include guidance that could come into force to improve housing standards, including in the area of sustainability as this is allowed by government.

9.2 Housing for Older People

In addition to this focus on the scale of housing provision for older people, there is a need to provide housing at a level that is affordable. This evidence shows the shortfall in this sub-market provision is greater than for market housing for older people. Therefore this evidence, together with the evidence of sufficiency of housing provision for those with sub-market housing need (e.g. younger people) should feed into the forthcoming review of the SPD for Affordable Housing.

It is unclear why new homes for older people are separately considered as a component for the urban extensions locations considered in this consulted DMP. The accessibility of these locations (as noted in Annex 4 of the DMP) is limited. The suitable location of housing for older people is also important, but has not been considered in this evidence base.

9.3 SHLAA 2016 Addendum

The term deliverable is understood to mean within the next five years. The term developable is understood to mean during the plan period. These terms should be clarified, and clearly defined at the start of this evidence base to improve readability for the non-specialist reader.

The following comments (additional to those made elsewhere) are made on this document.

1. The proposal to develop the Homebase site (60 homes, developable) is considered potentially delivered in more than one phase, potentially together with some improvement of the Reigate station car park as discussed under Alternative Sites in this document. The need for a Homebase or similar DIY store locally is noted as still being required. This wider opportunity may yield a greater number of homes – or equivalent number whilst retaining the Homebase store.
2. Noted that land East of Bell Street (RC14) is no longer considered developable. Different ways of how this site might be brought forward should be investigated.
3. Note that RW17 (Berkeley House, High Street/Chapel Road, Redhill is described under Additional Sites in this document
4. Note RE06 (Liquid and Envy) should still remain deliverable. The problem appears to be related to a desire for owners to speculate on potential land value and number of units deliverable on this site (already increased once), rather than deliverability of the site. It is inappropriate to consider this site as

- 'achievability uncertain' as it is mid-way through construction. Efforts should instead be made to re-start and complete construction on this site.
5. RE25 (allotments adjacent to ERM1) should not be allocated for development.
 6. EW08 the deliverable housing figure of 30 at this site should be considered alongside continued provision of groundfloor commercial use for small business and charities, including so existing businesses can continue lease at comparable rents, where desired.
 7. HE02 (Gasholder, Balcombe) and RE10 (Gasholder site, Hooley Lane nr Redhill) further work should be undertaken as to how these could be deliverable, both for industrial and limited residential development (HE02) and for residential (RE10).
 8. M11, land north of Rockshaw Road. This site is constrained by motorways. Some sites on this list may overcome some of the site constraints through development through an alternative route. For example, is part of this site developable while preserving the heritage and limiting landscape impact? What is the strategic policy change that constrains development here? Is a suitable location for self-build affordable housing initiative locally?
 9. Does part of the Fire Headquarters site off Croydon Road, Reigate potential to be considered as a school site locally?
 10. RC22, Town Hall site. This is supported as a more practicable alternative to a supermarket/big-box store at this location.
 11. RE04 As noted elsewhere this should retain plant nursery and current operational community use, and consider provision of ground floor community use here or at the Longmead site.
 12. RE23 (Victoria, House, Brighton Road, Redhill) is noted as a vacant office building. Such sites should either be included, or an additional windfall figure for permitted development (office and commercial to residential conversion) be allowed in the plan by the Planning Inspectorate.
 13. RE26 (26-28 Station Road, Redhill – 14 units) is noted as deliverable. This appears to be under construction. The adjacent building should also be considered, as is noted separately under Alternative Sites.
 14. RW01, Land at Cromwell Road/Sincotts Road, Reigate). Assume this is within the Cromwell Road estate in Redhill. There might be other locations in this vicinity that could also be reviewed as developable, perhaps as part of a wider scheme (see separate note under Alternative Sites) and where a garage block or parking area can be replaced by new homes with undercroft parking.
 15. RW14 (21 Clarendon Road, Redhill) is noted as unimplemented permission. There are flats in this location already. Is this these, or additional?
 16. RW12 (Bridge Family Centre, Station Road, Redhill). This is noted as developable but with operational needs. This could be developed in a similar manner to adjacent flats, ideally with undercroft parking and re-providing community facilities on the ground floor. This is included under Alternative Sites.
 17. SPW06 (Land at Lavender Sandpit, Cockshott Hill, Reigate). This is a Local Nature Reserve and Site of Nature Conservation Importance, and identified as a key BOA associated with Priory Park. It should never be redeveloped for housing. We recommend the word 'currently' is deleted so it reads 'Not developable'.

9.4 Urban Extensions Technical Report

The sites East of Redhill have been reviewed. Additional points are noted as follows:

- Constraint on sites ERM2 and ERM3 should include BOA designation
- Constraint on site ERM1 should include requirement to restore majority of site to woodland
- Visibility of the sites, as part of landscape feature designated AONB and AGLV out of Redhill.
- Traffic issues relate to all three sites, not just ERM1. The transport assessment used to underpin this analysis is out-of-date and understates the level of congestion on the A25 at this point, and running into Redhill.
- Conclusions on these sites should reflect the above
- These aspects, and the degree to which they cannot all be mitigated, should be reflected in overall prioritisation of sites.

It is not agreed that the best location for school (or healthcare) provision is in these site locations.

In general the housing densities proposed on these (and the other) urban extensions is low, reflecting car dependant *unsustainable* developments in terms of accessibility, as opposed to the *sustainable* urban extensions consulted on at the Core Strategy stage. This is challenged as inconsistent with the core strategy and the rationale underpinning the concept of 'sustainable urban extensions'.

Therefore, as stated in the conclusions (using the word 'potentially sustainable and suitable') we do not believe the case for inclusion of these three sites in the DMP site allocations stands.

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