

**Reigate and Banstead Borough Council**  
**DEVELOPMENT MANAGEMENT PLAN REGULATION 19 CONSULTATION**  
**RESPONSE FROM EAST SURREY GREEN PARTY**

## **Summary**

We do not believe the Development Management Plan (DMP) in its current form is sound.

The government is desiring higher housing density and that Councils should not build on the Green Belt. There is a massive demand for genuinely affordable homes in Reigate and Banstead. This plan does not meet any of these connected challenges.

Firstly, by not setting a density target, and not prioritising high densities on most sites included in the Plan, including those identified as being accessible locations (see Annex 4 of DMP), the DMP is not proposing to make the best use of land.

With higher density at sites proposed in the DMP, completion of both Part 1 and Part 2 of the Brownfield Site Register, and including other sites known to be developable in the urban areas, the total housing target could be met within the existing urban areas of the borough. We are proposing this as an additional policy.

Secondly, by increasing densities on both current and additional sites in the urban area, including on additional smaller sites (which could be included in the HELAA if minimum density targets are adopted), there is no need to develop on the Green Belt within the plan Period. This removes the need to release any sites from the Green Belt during the Plan period, and also removes the need for additional land to be safeguarded for beyond the Plan period as the proposed 'sustainable urban extension' (SUE) sites are sufficient to serve as safeguarded sites beyond the Plan period.

Furthermore, building at higher densities (including in more sustainable locations, with lower parking provision) will enable more affordable housing to be provided. This will be partly achieved by increasing density to increase viability, and partly through a higher affordability target being reflected in lower land values. Developments could utilise self-build and custom build (in accordance with a proposed policy included below). This approach, as proven by Cherwell District Council and through the Live Over the Shops (LOTS) initiative, could enable Reigate & Banstead to provide more genuinely affordable homes. We note that the Council's local authority owned property company could be used to facilitate such schemes, potentially through establishing a Community Land Trust to ensure that social rents are secured for such homes over the long-term.

Thus, by increasing density and affordability, our housing provision can meet our *local housing need*. And by providing these in the most sustainable locations (in our existing urban areas) we can increase the sustainability of our communities whilst protecting the countryside and Green Belt.

In that way we can plan in a way that retains the character of our borough, with its discrete settlements within London's Green Belt.

This response is split into the following sections:

A – Comments on Plan Policies. This includes proposed additional policies on dwelling density, tall buildings, townscape and self-build homes, and significant change to the policy on affordable homes.

B – Policies relating to specific sites. This focuses on the SUE sites, Horley Business Park, and the proposed 'Redhill Aerodrome' site.

C – Proposed additional sites to avoid need for release of Green Belt land,

D – Wider conclusions regarding need for Green Belt release and Affordable Home provision during and beyond the plan period.

## **A. Comments on specific policies in the DMP**

### **A.1 Include Policy on Dwelling Density**

There is no density policy in the DMP. Without such direction, we are likely to see density of 25-30 dwellings per hectare – far lower than is typical in our existing urban areas. Building at low densities within the urban area is increasing the pressure to build outside the urban area, including on the Green Belt. We have reviewed the density proposed for all of the urban sites within the DMP.

#### **Examples of existing densities:**

- Watercolour housing development, Redhill: 60-65 dph (over 10 hectares)
- Terraced housing in the Borough: typically 60-90 dph
- Holmesdale Road, Reigate: around 150 dph
- Approved flatted developments in the Borough: 150-250 dph range

The DMP includes proposals to allow very low density developments (e.g. 25-30 dph) on SUEs.

We believe there is substantial potential to increase density in the DMP, thereby enabling higher affordable through improving viability. We propose an additional policy be included in the plan:

#### **Proposed Policy on Dwelling Density DD01**

The appropriate density of residential development will be informed by:

- the character and mix of uses of the area in which it is located, including consideration of any nearby heritage assets or important landscape areas;
- its current and future level of accessibility by walking, cycling and public transport;
- the need to achieve high quality design;
- the need to maximise the efficiency of land use; and
- the need to minimise environmental impacts, including detrimental impacts on the amenities of adjoining occupiers.

Indicative densities for different types of area are set out in figure 1, but the criteria above may indicate that a different density is appropriate in certain locations.

Net densities of below 30 dwellings per hectare will not be acceptable.

With the significant need for housing in Reigate and Banstead and surrounding areas, it is important that efficient use is made of the land that is available to boost the delivery of new homes. However, there are other considerations that need to be weighed against this, in particular the character of

the surrounding areas and any other particular sensitivities. Each site has its own particular characteristics, and it is not appropriate to set down exact densities in this policy.

Nevertheless, some guidance on appropriate densities in different areas can be helpful as an indication, and the figure below therefore sets out ranges within suburban, urban and town centre sites. It is important to note that these will not be applied as hard-and-fast rules, and the particular characteristics of a site when judged against the criteria in the policy may mean that a density outside these ranges is appropriate. This will particularly be the case where existing buildings are to be converted.

Town Centre	High Accessibility	Medium Accessibility	Low Accessibility
Above 100 dph	60-120 dph	60-120 dph	30-60 dph

**Figure 1. Indicative Density Ranges (dwellings per hectare), referencing accessibility of locations.**

### **Explanation:**

Density. Not all Development Management Plans have a specific density policy. However, in areas where there is a desire to prevent urban sprawl and protect the urban-rural nature of a local area, this is desired. The principles proposed here are drawn from the draft Draft Reading Borough Local Plan<sup>1</sup>.

A density policy in Reigate & Banstead Borough Council's DMP will ensure that appropriate housing types, in mixes suitable for sites and aligned to local demand, are chosen and that these meet minimum density targets, which improve the character, design and sustainability of existing urban areas.

Including this policy will ensure sensible levels of density to be achieved. It will also support delivery of TAP1 and CCF1, in line with the recommendations of the Better Growth, Better Climate<sup>2</sup> report, which sets out how more compact development is better socially and environmentally.

This policy should inform a review of the viability report for the DMP. The viability of higher density schemes should be assessed, and will enable higher affordable housing targets to be adopted in the Final version of the DMP.<sup>3</sup>

### **Impact on Housing Numbers on Sites in the DMP**

#### Existing housing targets

The DMP subdivides the Borough into four areas and says that these must deliver 4,980 houses in the urban area from a total of 6,900, as follows:

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<sup>1</sup> See

[http://www.reading.gov.uk/media/7154/DraftReadingBoroughLocalPlan0517/pdf/Draft\\_Reading\\_Borough\\_Local\\_Plan\\_0517.pdf](http://www.reading.gov.uk/media/7154/DraftReadingBoroughLocalPlan0517/pdf/Draft_Reading_Borough_Local_Plan_0517.pdf)

<sup>2</sup> <http://static.newclimateeconomy.report/TheNewClimateEconomyReport.pdf>

<sup>3</sup> Currently the viability report has tested the ability to deliver affordable homes on a range of sites, mostly at (very) low densities without considering whether the sites would be viable at higher densities (instead different proportions of affordable housing have been considered in some cases). For example, if a higher (but still entirely reasonable) density was proposed for the Gloucester Road site in Redhill (RTC6) and former Merstham Library Site (RED5), these would then be calculated as viable.

- Area 1 (North of M25) 930;
- Area 2a (Redhill and Merstham) 1330;
- Area 2b (Reigate) 280; and
- Area 3 (Horley) 2440.

This is a total of 4,980 housing units over the plan period.

The DMP says that the remainder of 1,920 may have to be built outside urban areas, of which 200 units are allocated (and could be accommodated on 2.3ha at 75dph) in the Horley SUE area, and the rest are proposed to go in the urban extension areas around Redhill, Merstham and Reigate.

#### Increasing density will improve viability

The viability report of the DMP state that

*“almost all of the brownfield urban site allocations for residential use are viable. Only the allocated development schemes on Gloucester Road Car Park, in Redhill Town Centre, and the Former Chequers Hotel in Horley are unviable.”*

Gloucester Road Car Park is an ideal sustainable development location and its viability could be addressed in part by increasing density.

The assessments being based on the full policy requirement for affordable housing show most of the urban sites being viable for housing. In recently approved schemes involving housing, such as the Liquid and Envy and Marketfield Way sites in Redhill, did not achieve the full policy affordable housing requirement. It would seem reasonable to increase housing density to improve viability on the schemes referenced in the DMP.

#### Increasing density will increase housing provided on urban sites

The DMP proposes sites in the urban area and ascribes a theoretical number of units to the sites.

Although it is recognised that terraced housing is conventionally the most efficient form of housing layout, and moreover provides two-bedroom accommodation which is characteristic of towns like Redhill, there is little discussion of this form in the DMP. This type of dwelling typically achieves a density of around 60-90 dwellings per hectare.

In the urban areas, densities could go significantly above 100 dwellings per hectare, especially where flats are combined with other housing types in town centre and highly sustainable locations (as proposed in the policy above).

By assessing the existing urban area sites identified in the DMP at a higher density of an average of 75dph, more than 600 extra units would be provided.

Therefore, higher densities will reduce the need for sustainable urban extensions to come forward, even before any other sites are included in the plan.

#### Increasing density will reduce need for urban extensions

Increasing density will increase the number of units that could be provided on each sustainable urban extension site too, so that if they are still required (see Section C below), fewer sites will be needed.

The DMP Viability report advocates that urban extensions should be treated as very low density, circa 24dph, for reasons of character, design etc. Land identified as potential sustainable urban extensions in and around Redhill, Merstham and Reigate amounts to around 61ha.

These urban extensions are only intended to deliver housing after all existing urban sites are developed. We believe they should not be required during the Plan period. But should SUEs be used, we argue that they should be built at a greater density than the circa 24dph proposed, by including a greater proportion of terraces, flats and town houses. Use of these efficient housing types could allow the SUEs to deliver density of between 60-120dph. 75dph is very reasonable as an overall guide to what could be appropriate in the net (housing areas) of these areas.

To achieve the 1,920 homes from outside urban areas would require at an average of 75dph would require only some 25 ha of net land (after green space and other infrastructure provision) in these urban extensions. This suggests that the number and scale of urban extensions envisaged in the DMO far exceeds what is required.

## **A.2 Include Higher Affordable Housing Policy Target**

- There is a serious lack of affordable housing in our area.
- The target ‘to provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford’ is the first objective listed against which the sustainability appraisal tests this DMP. On this objective alone it fails.
- This is because the DMP proposes providing affordable homes on the back of developers building more homes for higher-income households. This approach (with affordability defined as 80% of market rent) is not providing homes that are genuinely affordable to meet local need, including homes for social rent.
- Affordable housing should be in the town centres, which are sustainable locations for infrastructure, not in the countryside or urban fringe locations.

**Proposed Policy change:** *The minimum target for affordable homes should be at least 50% on all sites, in all locations.*

Such a level exists in other Council, such as Oxford City Council<sup>4</sup>. This policy was established when the average house price in Oxford was 11 times average earnings. The average house price in Reigate and Banstead is now 14 times average earnings.

## **A.3 Reintroduce Self-Build Policy**

The Regulation 19 response deleted the draft (Regulation 18) policy on Self-build housing. We propose reinstating such a policy:

*Residential proposals for ten houses or more (excluding houses that are to be provided as affordable homes) will be expected to include at least 10% of plots as self-build.*

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<sup>4</sup> [https://www.oxford.gov.uk/downloads/file/596/ahpo\\_adopted\\_spd](https://www.oxford.gov.uk/downloads/file/596/ahpo_adopted_spd)

We propose that the Council also develop an *SPD* on self-build and custom housing, as Teignbridge Borough Council has done.<sup>5</sup>

This policy and *SPD* will enable those on self-build register (now and in the future) to build their own home. It will also increase access to more affordable housing, including tenancies.

It could be applied at a small-scale using small plots that are not currently in the Brownfield Site Register. It could utilise Part 2 part of the Brownfield Site Register, and count towards the Council's five-year land supply requirements and estimation of land requirements to deliver the DMP<sup>6</sup>. Currently the Brownfield Site Register does not include small sites, or indeed all brownfield sites in the urban area which could be developed, and Part 2 has not been completed.

We propose self-build is utilised to provide 25 homes/year – either through utilising the 'permission in principle' process in the Brownfield Site Register or through an increase in the annual windfall allowance.

Elsewhere self-build has been a mechanism that has led to more affordable homes, as is demonstrated by the scheme currently being built out by Graven Hill (owned by Cherwell District Council), where the Council has acted as the lead site developer.<sup>7</sup>

#### **A.4 Inclusion of Tall Buildings Policy and Masterplan for Redhill.**

Two policies have been deleted in the update from Regulation 18 to Regulation 19 that affect the protection and enhancement of the Borough's town centres, and, as the most significant retail centre, Redhill in particular. We propose that these two policy areas are fully reflected in the plan, so the town centres can be improved, and proactively planned.

##### Tall buildings

We propose a Tall Buildings Policy is included in the DMP covering the following aspects:

- Silhouette and impact on overall sky-line. Require new tall buildings to be in line with masterplan of their immediate and wider areas – which highlights the need for a design guide to inform town centre developments. Without a proactive planned approach to its overall development; Redhill risks becoming more and more like Croydon.
- Permeability for active travel;
- In line with best practice, including guidance from English Heritage and CABE
- Where there is scope to maximise density in town centres and edge-of-centre locations the scope to go to medium-rise, four to ten storeys, should be progressed to enable more efficient development in accessible locations.

Cherwell District Council's Local Plan offers a policy that could be used as a starting point.<sup>8</sup>

##### Townscape

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<sup>5</sup> <https://www.teignbridge.gov.uk/media/4974/custom-and-self-build-housing-july-2016.pdf>

<sup>6</sup> As noted at <https://www.gov.uk/government/publications/brownfield-registers-and-permission-in-principle/brownfield-registers-and-permission-in-principle-frequently-asked-questions>

<sup>7</sup> <https://gravenhill.co.uk/>

<sup>8</sup> [npa.cherwell.gov.uk/LocalPlan/written/cpt10.htm#13](https://npa.cherwell.gov.uk/LocalPlan/written/cpt10.htm#13)

The policy on area of special townscape importance has been deleted. In 2013, the Council consulted on a Redhill Area Action Plan but this has not been progressed. There should be a strategic, proactive development strategy for our town centres, supported by a design guide. This goes beyond the DES1 policy to focus on spatial planning and should be supported by a SPG, acting as a masterplan for Redhill and other main town centres.

## A.5 Comments on Other Policies

POLICY	Comments and proposed changes
DES1 Design of new development	<p>The explanation says that this policy covers tall structures, however it does not include the previous proposed constraint on the extent of very tall buildings in Redhill town centre. We propose that that policy and constraint map be reinstated, together with policies on tall buildings and townscape, as set out above.</p>
DES6 Affordable Housing	<p>This is heavily revised and replaces the SPD which was presented alongside the Core Strategy. We note that the price of local homes is currently 14 times the average salary in Reigate and Banstead. We propose a 50% affordable housing overall target as stated above.</p> <p>The Area Factsheet for Redhill<sup>9</sup> has a ‘Frequently asked questions’ section which, in response to the question “Why is Green Belt being removed for housing development ...” states that, “The government requires local authorities to plan for new housing to meet future needs. More homes are needed to meet the needs of local people and workers – without these new homes, the local economy will suffer, and the children of local residents will be forced to move away.”</p> <p>This implies that the proposals in the DMO address local housing need, including for the next generation. However it is not clear that the viability of the plan has been tested in terms of whether the proposed mix of affordable-to-buy, affordable rents and social/other rents reflects the current income distribution of Reigate and Banstead residents. The viability seems to focus on how many affordable homes developers will build (at low densities) rather than assessing how many affordable homes are required, and then determining how these can be provided in the most sustainable sites. The viability of building at higher densities, with land prices reflecting higher affordable housing targets, including social rented properties, has <i>not</i> been tested.</p> <p>There remains a risk that inflated land prices, driven by viability estimates that reflect the market’s preferred housing density and mix (which maximises profitability) as opposed to a density and mix which satisfies affordability and sustainability), will undermine the DMP plan. The calculated land values are based on current practices – as opposed to reflecting how a Plan might affect prices.</p> <p>The predicted profitability and various elements of scheme cost appear to be based on one set of estimates. There appears to have been no consideration of</p>

<sup>9</sup> <http://www.reigate-banstead.gov.uk/downloads/file/2700/redhill>

	<p>how changes from current plan policies, or self-build or other housing delivery models, might impact on land sale prices appear. This undermines the soundness of the DMP.</p> <p>Unless the plan is adjusted to provide a calculated sufficient number of social rented properties it is not clear that it will meet local need.</p>
DES7 Specialist Accommodation	This deletes the draft policy on self-build and custom build housing. We propose reinstating a self-build policy, to be supported by a SPD. Proposed text is included in section A.3 above.
OSR2 Open space in new developments	We welcome the increased clarity on open space requirements for different sizes of new developments.
CCF1 Climate change mitigation	We welcome the bringing together of the elements from other policies consulted on in Regulation 18 and the strengthened policies now proposed. We note the viability cost estimate of £8/dwelling and ask if this should indeed be strengthened further. Previously the government was aspiring to achieve zero carbon homes by 2016. Passivhaus standard (or similar) can reduce energy running costs substantially, thus increase both energy efficiency and occupant affordability of all kinds of building.
CCF2 Flood risk	This refers to seeking advice from the Environment Agency. It should also reference Surrey County Council as the Lead Local Flood Authority under the Flood and Water Management Act.
NHE1 Landscape protection	The proposed changes from the Regulation 18 consultation will weaken the protection of the Area of Great Landscape Value (AGLV). This should be reversed.
NHE2 Protecting and enhancing biodiversity and areas of geological importance	<p>The proposed changes from the Regulation 18 consultation will weaken the protection of the environment.</p> <ul style="list-style-type: none"> <li>- Point 2 is now weaker, appearing to protect only part rather than all of a Site of Special Scientific Interest (SSSI). The final sentence ends saying 'suitably mitigated'. This is vague and should be clearly defined.</li> <li>- Point 3 also lacks clarity – as the type of benefits (whether they are conservation benefits for example) is not defined. What are the benefits that can outweigh the value of nature? How is it proposed that the needs and benefits are evaluated as having greater value? Is it environmental value, or are we proposing social or economic value? There are no criteria and no definition is given. We are concerned that this leaves it possible for a coach and horses to be driven through this policy.</li> <li>- In paragraph 5b remove 'wherever possible'. The policy should state what is expected, not have get out clauses in it.</li> </ul>
NHE3 Protecting trees, woodland areas and natural habitats	<p>This has been weakened. Delete the opening 'Where relevant' from Paragraph 1.</p> <p>In Paragraph 2, delete 'unless the need for, and benefits of, development in that location clearly outweigh the loss.'</p>



	In Paragraph 4, delete ‘unless the need for, and benefits of, development in that location clearly outweigh the loss’ at the end. Without any criteria defining how you judge what needs can outweigh what, the policy is weak
NHE4 Green/blue infrastructure	The words ‘water related purposes’ must be clarified to ensure it does not detract from the rest of the policy.
NHE5 Development within the green belt	The Regulation 18 consultation asked about removing East Surrey Hospital from the Green Belt. However, this has not just removed the building, but the car park and the pitch and putt area to the east. Only the built form of the hospital should be removed from the Green Belt, and not the large areas that are currently not built on, as is now proposed.
NHE6 Reuse and adaptation of buildings in the green belt and the rural surrounds of Horley	This does not say anything about the massing or quality of the build required. Some examples of what would be considered acceptable would be useful in the explanatory text.
NHE7 Rural surroundings of Horley	This should more clearly define what is meant by ‘small scale’ and what is meant by not ‘compromising the quality of the countryside’.
INF2 Community facilities	The explanation should be widened to broaden the definition of types of community use.
MLS1 Phasing of Urban Extension sites	There is no clear rationale provided for the phasing of key sites listed. Instead of a specific order, the sequence should be more flexible.  There is no justification as to why the Hillsbrow site should be brought forward so early in the plan period.
MLS2 Safeguarded land for development beyond the plan period	This policy has been consulted on without including a map showing the locations of all the alternative sites that were considered. The Redhill Aerodrome site is listed in the Brownfield Site register as having the capacity for c.130 dwellings. However, the same name ‘Redhill Aerodrome’ is also used to describe a safeguarded site around the aerodrome that will accommodate up to 1,312 homes within Reigate and Banstead as part of a 8,000-home cross border development, as well as a new motorway junction and link road. The consultation setting out the area of land considered here was not clear. Our detailed comments on the policy itself are included in Section B below.

## **SECTION B. Comments on Policies Relating to Specific Sites**

### **Policy HOR9 - Horley Strategic Business Park**

We believe this policy is **not sound**, and should be excluded for the following reasons:

- There is a lack of evidence to justify the need for a business park. This area does not suffer high unemployment, and there is ample vacant employment space in the surrounding area.
- This is a departure from the adopted Core Strategy (2014), the 'Horley Master Plan 2005' and the 'Horley Town Centre Vision' document (2015). The Core Strategy says that the Council will reuse and intensify existing employment land and "envisages no new major commercial development for Horley".
- Surrey County Council's Transport Development Planning Team has stated that the development will significantly worsen the existing traffic situation in terms of safety and capacity.
- Horley would lose the Public Open Space that separates Horley from Gatwick. The 'Gatwick Open Setting' was created to protect Horley from physically joining Gatwick Airport.
- Large areas of the site are floodplain. The site appears to have been selected without consideration as to whether the site is appropriate for development.
- The Sustainability Appraisal states that traffic impacts should be dealt with at the planning application stage: 'mitigation should be identified at the planning permission application stage, at which point a more site specific transport assessment can be undertaken, but may include infrastructure improvements or measures to significantly reduce the number of trips generated by the development'. This approach is inadequate. Some assessment should be required at this stage – as this is a proposal for a stand-alone, very large, employment site, to be on greenfield land. A screening to identify levels of impacts, and acceptability should have informed its inclusion in the DMP. Yet no transport modelling appears to have been carried out, or reviewed as part of the plan-making process.

## Policy MLS2 - Safeguarded land for development beyond the plan period

We object to the proposal to 'safeguard' Redhill Aerodrome and land to the north and west (designated SAS1) for development beyond the plan period. We propose this policy be removed, and the site SAS1, be deleted from the DMP, for the following reasons:

We note that this is a departure from the adopted Core Strategy (2014), which does not talk of safeguarding land and does not envisage development in this area.

### Not necessary

The Safeguarded Land Evidence Document quotes Nick Boles, who said in May 2014, while he was Planning Minister, "*Safeguarding is not a requirement for every local authority with green-belt land. It is something that it can choose to do, but only if necessary. If the plan that it puts forward has provisions to meet housing needs in full and if other sites are available for potential future development beyond the life of the plan, it may well be that safeguarding land is unnecessary.*" As we have demonstrated elsewhere in this response, there is sufficient developable land within the urban areas of Reigate and Banstead to make this safeguarding proposal unnecessary.

The advice went as follows "*When defining boundaries, local planning authorities should where necessary:*

- *identify in their plans areas of 'safeguarded land' **between the urban area and the green belt** (bold added) in order to meet longer-term development needs stretching well beyond the plan period;*

- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;”*

Again, on this basis the Council should not be required to safeguard *any* land beyond the plan period.

We note that this is proposed for 1,312 housing units at a density of 30dph – very low density implying larger homes which are likely to be sold on the open market, so not meeting local need.

The site has been actively promoted for a standalone settlement by Thakeham Homes, and this policy appears to be developer-driven rather than need-driven.

#### Speculative and premature

We note (paragraph 4.10.22) that development of this land is conditional both on a new highway link between the A23 and the M23 and the cooperation of Tandridge District Council. Tandridge District Council is currently considering options for a 'Garden Village' of up to 8,000 homes as part of their Local Plan. Redhill Aerodrome is just one of several locations Tandridge is currently evaluating, and does not appear the most likely choice. We consider it premature for Reigate and Banstead to be creating policy based on an assumption about Tandridge's plans. If Reigate & Banstead's Development Management Plan is adopted including this policy, it could prejudice Tandridge's decision.

#### Setting a bad precedent for infilling

If this area is developed, the areas between Salfords and Whitebushes will come under greater pressure for urbanisation as infill locations and sprawl will be inevitable.

#### Green Belt

The NPPF says (para 84): *“When drawing up or reviewing Green Belt boundaries, local planning authorities should... consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt boundary or towards locations beyond the outer Green Belt boundary.”*

The Council agrees that the site fulfils three of the objectives of the Green Belt: It makes a 'high contribution' to keeping settlements separate and a 'moderate contribution' to checking urban sprawl and safeguarding countryside (evidence document p179). Development of this site would undermine all three of these objectives, and would result in South Nutfield, Whitebushes and Salfords merging into one sprawl, connected to Redhill to the north and Horley to the south.

Page 263 says this site is of 'moderate importance to Green Belt' – we say this is a misjudgement. The site's importance for the Green Belt has been tested many times over by a series of planning applications for a hard runway at Redhill Aerodrome – which have been refused by both Reigate and Banstead and Tandridge Councils, and the refusals upheld on appeal. Reigate and Banstead Planners and Planning Committees have consistently maintained that any intensification of aviation at this site would damage the Green Belt. As recently as October 2017, RBBC planning committee refused a (retrospective) planning application at the aerodrome, saying: *“...the proposal, by virtue of the extensive additional hard surfacing, constitutes inappropriate development within the Metropolitan*

*Green Belt which would erode the openness of the Green Belt.*" This was for a flat taxiway. Clearly 1,312 new homes and associated infrastructure would have a far greater impact in eroding the openness of the Green Belt.

Most of the land in SAS1 is undulating farmland with extensive views. There are a few houses and farm buildings but it has a very rural atmosphere. It is also visible from the Greensand Ridge just to the north of it. The Safeguarded Land Evidence Document itself notes that: *"The development is likely to have a significant negative impact on landscape character due to the size of the site in a currently undeveloped area in the countryside."*

We therefore contend that SAS1 fails to meet the criterion requiring "no or limited conflict with the purposes and integrity of the Green Belt". It would have a major and serious conflict.

### Transport

The Evidence Document says that: *"The site is currently some distance from sustainable transport facilities, but a new settlement of significant size could be planned around sustainable travel from the start"*. It is hard to see how this could be done. It would be a long walk to the railway stations at Nutfield, Earlswood or Salfords. And the development would lead to thousands of extra vehicles and journeys, adding to congestion, danger to pedestrians and cyclists on roads without pavements, and air pollution.

The existing local road network is already inadequate for the traffic it takes. Major road improvements would be required, which again undermines the claimed sustainability of this site. And it would not be easily done. Road access is constrained to the north by the Redhill-Tonbridge railway line (there are two roads leading north, both with very narrow railway bridges). To the West is the Redhill-Gatwick railway line, with its narrow arch at Three Arch Road. To the East is the M23.

### AONB and AGLV

We note that Nutfield Ridge (the stretch of the Greensand Ridge to the north of this site, extending from Nutfield nearly into Redhill) is being considered for addition to the Surrey Hills Area of Outstanding Beauty in Natural England's boundary review.<sup>10</sup> I cannot find any mention of this in the DMP documents, even though Policy CS2 of Reigate and Banstead's Core Strategy says: *"The Surrey Hills AONB is a landscape of national importance and will therefore be provided with the highest level of protection. The same principles will be applied to protect the AGLV as an important buffer to the AONB and to protect views from and into the AONB, until such time as there has been a review of the AONB boundary."* (our emphasis)

The views from the Ridge, and its footpaths, look straight down onto the Aerodrome and surrounding countryside, so, should Nutfield Ridge become part of the AONB, development of this site would severely damage the view from the AONB. Meanwhile, the AGLV includes the land between the Ridge and the railway line, coming close to the boundary of this site.

### Sustainability Appraisal

The locations of the potential sites for safeguarding are not clearly set out in the main DMP document or in the sustainability appraisal. However, the way that assessment has been completed

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<sup>10</sup> <http://www.surreyhills.org/boundary-review/> Map of recommended areas for adding to the AONB at <http://www.surreyhills.org/wp-content/uploads/2016/02/Recommended-additional-areas-Oct-2013-low-resolution-OS-base.pdf>

appears not just subjective but incorrect. We note the following points, all of which are overstated or plain wrong:

- Affordable housing. Score green++. Developer advertising shows that average house price as around £650,000 (based on advertised council tax revenue expected once occupied). Density is proposed as 28-30 dph. These large homes will not be affordable. **This is incorrect.**
- Health and Wellbeing. Score green+ based on pedestrian and cycling facilities and proposed green spaces. The development is likely to be car dependant, with a new link to the M23 and will generate traffic. **This is incorrect.**
- Reduce the need for travel. Score yellow (neutral). Noted as good for public transport. This is rubbish. It is a long way from existing facilities and infrastructure, including the A23. The plans include an A23-M23 link road, houses at a lower density than the Borough average, with a higher-than-average car occupancy. This will increase carbon emissions from transport: directly due to the development, indirect in terms of the increased car ownership, and induced in terms of the road capacity expansion. **This is incorrect.**
- Make best use of previously developed land. Clearly, building over four square kilometres of greenfield land rather than first utilising all urban brownfield sites is not meeting this objective. To achieve it the Brownfield Site Register would need to consider all available urban sites, including for 5-10 units (currently more urban sites are included in the sustainability appraisal than in the Brownfield Site register). Either way, building on greenfield land (for 7,830 of the 8,000 proposed homes) should be classed as red. **This is incorrect.**
- Supporting economic growth. Ranked green++ but the commentary says N/A. This is inconsistent – and is not an objective that should trump building on the countryside. Some hierarchy of priorities is needed in the sustainability appraisal so that it functions as a *strategic environmental assessment*, and informs policy making. This is not the case. **This is incorrect.**
- To provide employment opportunities. Green++. Once built this is a housing site. It is not proposed also be an employed site, beyond the expected community infrastructure. **This is overstated, and incorrect.**
- Reduce greenhouse gases. Yellow (neutral) – on basis of transport impact. See above. This is impossible as a motorway link and car dependency are proposed. **This is incorrect.**
- Use natural resources prudently. Yellow (neutral). Noted as mostly poor to moderate quality agricultural land. Developing on it will not improve the land use (only the financial land value). Fewer resources will be used by building more affordable homes within the urban area. **This is incorrect.**
- Adapt to climate change/flood risk. Yellow (neutral). This is proposing to build on land that floods each winter. It will displace flood water, and therefore exacerbate flood risk. **This is incorrect.**
- Reduce land contamination/safeguard soil. Noted as mostly poor to moderate quality agricultural land. Developing on it will reduce soil value as it will not be able to be used to grow crops again. **This is incorrect.**
- Improve air quality. Yellow (neutral). Only construction impacts considered. The greatest contribution to air pollution in the Borough is transport. The area around the A23 in Redhill is an Air Quality Management Area. Increasing road link to the A23 will increase

traffic, which will increase congestion and the main source of air pollution locally. **This is incorrect.**

- Protect and enhance landscape character. Red (negative). States that “development should be of sufficient density to represent a clear new settlement” rather than appearing as a spread into countryside. This is patently untrue – it is proposed as an urban sprawl of low density development comprising 8,000 homes, originally marketed as a ‘garden village’ and subsequently as a ‘garden community’. **No acknowledgement of any impact of rural landscape reflected in appraisal, or its relation to the AONB or AGLV.**
- Conserve/enhance biodiversity. Yellow (neutral). This states an 8,000 home development on a 98% greenfield site will have no impact. **This is incorrect.**

Review of this one site (perhaps the most significant single site in the DMP) in terms of how it is evaluated in the Sustainability Appraisal calls into question the overall soundness and sufficiency of the sustainability appraisal. **This alone calls into question the soundness of the DMP.**

### Conclusion

In conclusion we see no reason why we should rush to have safeguarded land around and including Redhill Aerodrome, if we utilise the sites available in the urban area, and target higher density homes on identified, brownfield site register and other urban sites, as is set out above.

## **Other Site Specific points**

**These should be read alongside our comments made during the Regulation 18 consultation.<sup>11</sup>**

### ERM1 – Land at Hillsbrow

- Hillsbrow is completely in an area designated as ancient woodland. The central section was quarried and required to be fully reinstated. It is an area of high biodiversity and should be restored to its former woodland habitat, not redeveloped for housing.
- Hillsbrow, is on the Greensand Ridge, which is a landscape feature that is a landscape of great value. This site, together with the site north of the A25 is a dominant in views from the North and South. The section Ridge just to the east is being considered for addition to the Surrey Hills Area of Outstanding Beauty in Natural England’s boundary review.<sup>12</sup>
- Hillsbrow is an unsustainable location for transport because it is at the top of the hill.
- Development of these sites East of Redhill will increase traffic congestion on the A25.

### ERM2/3 – Land west of Copyhold Works and former Copyhold Works

- Copyhold and the field to the west (known as the Paddock or Sheep Field) are presented together. Copyhold is a brownfield site if this is developed it the whole site will go together. These two sites are a ‘biodiversity opportunity area’, one of around 50 special sites of this kind across Surrey.

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<sup>11</sup> <http://redhillgreens.org.uk/downloads/esgp-dmp-10oct16-final.pdf>

<sup>12</sup> <http://www.surreyhills.org/boundary-review/> Map of recommended areas for adding to the AONB at <http://www.surreyhills.org/wp-content/uploads/2016/02/Recommended-additional-areas-Oct-2013-low-resolution-OS-base.pdf>

## ERM4&5 – Merstham

- Limited accessibility due to constraints of rail bridges and access via Schools Hill.

## SSW2,6,7,9 - Reigate (around South Park)

- This site does not have strong public transport links and is a long walk from Reigate town centre/station making it a less sustainable location.

## Other aspects of the Green Belt review

The approach is not clearly presented and appears entirely subjective. Why Redhill Aerodrome comes out scoring highest and is able to leapfrog many other sites, including those considered at the Core Strategy stage, is not transparent. The fact that the site is strongly promoted by a developer is alarming. A non-technical summary would be useful to assist non-specialist readers – including residents and councillors – in understanding which aspects have been assessed entirely subjectively and which are evidence based.

## Other Aspects of the Sustainability Appraisal

Some of the aspects highlighted here could be overcome by the way in which sites are developed. The values appear to have been assessed without consideration of potential design changes. For example:

- Development of the Belfry, Redhill, is ranked Red for both ‘adapt to changing climate’ and ‘flood risk’ yet the adjacent site, Marketfield Way, has just secured planning permission for major development.
- Berkeley House, Redhill, is next to Nobel House (recently developed into flats). If it lacks amenity, then why were the developments at Nobel House, Liquid and Envy, Marketfield Way and Redhill station all accepted by the planning department, without this being a concern. If this is a concern, then provision of additional community facilities to reflect this could be identified (for Redhill town centre in particular) in the IDP (Annex 6).
- It is entirely unclear why removing East Surrey Hospital from the Green Belt (along with a lot of land currently used as a golf course) so that it can get bigger will ‘stop increasing the need to travel’. If health services are localised and East Surrey Hospital not allowed to continue to grow, this would reduce the need to travel.
- In almost all (perhaps even **every single case**) the objective for climate adaptation and for flood risk are identical, with one sentence repeated (“the risk of flooding is likely to increase with the effects of climate change”) around 100 times through this report. If the appraisal is not going to consider **any** aspects regarding climate adaptation, then it is a bit pointless including it.

In contrast some sites are not able to mitigate potential impacts. For example, development of the Redhill Aerodrome site **will increase traffic impact** as highlighted above.

No evidence was presented to support any of the scoring in the (long but not very informative\_ sustainability appraisal.

## **Comment on Viability Report**

Some of the assumptions are overly costly. The estimate used for sales costs at 4.5% are excessive. Similarly, professional fees should not be much above 7-8%.

## **Comments on Parking Standards (Annex 4) and Infrastructure Delivery Schedule (Annex 6)**

The DMP proposes to increase the number of car parking spaces (in some locations) at a time when a switch to more sustainable transport modes (bus, train, walking and cycling) is needed to address climate change, congestion and air pollution. Transport is the main source of air pollution in Reigate and Banstead and the main sector in the UK where carbon emissions have not reduced.

The car parking standards are proposed now to be minimum, not maximum. This is likely to encourage (or at least continue to embed) car dependency in Reigate and Banstead. Instead, more investment in public transport networks and infrastructure and active transport corridors and infrastructure are needed so there are no longer areas in the Borough with poor transport links. Additional schemes should be sought from Surrey County Council and included in the Infrastructure Delivery Schedule. We propose the following additions:

### **Walking**

- Consider for the long-term a pedestrian bridge from Redhill Station to Bus Station (which will reduce congestion and improve road safety).
- Pedestrian crossings – review need of funding with Surrey County Council. Currently no budget to fund this through SCC local committee budgets

### **Cycling**

- Improved cycle route provision in the Borough. This should include extending the cycle route along the full length of the A23 from Redhill to Horley (included) and along the A217 from Reigate to Horley and Charlwood/Hookwood (not yet included – relates to LRN9- LRN14)
- Improve cycle routes and infrastructure to all schools in the Borough. This should include improving the pathway from Whitebushes to the new footbridge over the railway to Salfords and extending the cycle route along the north side of Hooley Lane from Birchwood Place to the junction with St Johns Road.
- Marking and promotion of existing cycle routes, including around Redhill from the Coop to the Sun, Memorial Park to Ladbroke Road, and Watercolour to Redhill.
- Extension of NCN route to Godstone and connection between Watercolour and Chilmead Farm.
- Network of e-bike charging points, potentially linked to street lights (as in the Netherlands).
- Increase cycle parking at stations (notably front of Redhill station) to encourage modal shift and reduce scale of commuter driving/kiss-and-drop to train stations.
- Implement A23 North cycle route (designed, but not built)- possibly CP18.

### **Train**

- Advocate for and support electrification of the North Downs Line.

### **Bus**

- Extension of 100 route from P25 through industrial estate to Watercolour.



- Upgrade Redhill Bus Station. The current layout was introduced as temporary, around 10 years ago. Buses still have to park up on Marketfield Way and on St Anne's Drive as there is insufficient space in the Bus Station.
- LRN8 should include bus prioritisation

#### Road

- LRN1 is needed to address existing congestion. Should be contingent on Horley Business Park or Redhill Aerodrome site developments.
- LRN2 should also improve for cyclists. This is a dangerous junction for cycling currently.
- Split pedestrian phase and island (as full pedestrian phase modelled not deliverable) to enable pedestrian crossing of A23 at London Road South at the junction with Battlebridge Lane. Improve access N/S, and to both Lime Tree School and by foot into Holmethorpe Industrial Estate etc.

### **SECTION C. Comments on the Inclusion of Additional Sites**

The following additional sites should, in our opinion, also be considered within the DMP, and included as 'deliverable sites' either via the Brownfield Site Register (part 2 process) and/or HELAA. Further details are included in our response to the Regulation 18 consultation.<sup>13</sup>

Brownfield site register. This has not included the Part 2 which would allow permission in principle in terms of use purpose for a sub-set of the sites. We understand that if the Council chooses to complete part 2 and grant 'permission in principle' for a number of these sites then the likelihood of these sites being developed will be enhanced, and these can then be included in the DMO. We propose that the Council extend Part 1 and complete Part 2 of the Brownfield Site Register as this will enable more sites to be brought forward for development in the urban area, potentially increasing the affordability and deliverability of the Plan, while protecting the Green Belt.

Office to Residential Conversions. This proposes residential conversion at both Castlefield Road (Reigate) and Furness House (Redhill). The Council should confirm whether these sites are included in the HELAA. The council owns Beech House (35 London Road, Reigate) and Forum House (41-51, Brighton Road, Redhill). These should be included in the HELAA if there is an expectation that they will be put forward for conversion to residential during the plan period. Grosvenor House, Redhill is also identified in the Sustainability Appraisal and scores positively and it is not clear why it has been identified here and whether it is a deliverable site.

Other known potential deliverable sites. The HELAA and brownfield site register does not appear to include some sites that are already being put forward by developers and landowners, including:

- the gasworks site in Earlswood (planning permission granted for site clearance) 30 units
- MOD site at the bottom of Batts Hill, which is listed as intended for housing on the government disposals website – 40-80 units (see earlier response for details).
- Land north of Brook Road, Redhill. This is identified as having the potential to deliver 12 units in the Sustainability Appraisal. This could be higher. And it could be included as a DMP site. +20 units

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<sup>13</sup> <http://redhillgreens.org.uk/downloads/esgp-dmp-10oct16-final.pdf>

- Marketfield Way youth centre site in Redhill is proposed for re-provision of Youth Centre with flats above. 40 units
- The Family Centre owned by Surrey County Council on Station Road, Redhill could be redeveloped retaining the single storey community use and providing affordable (social rented) flats above. 20 units

Car parks. These have been proposed for development in Redhill but largely not elsewhere. These are public sector sites so could be brought forward by the Council. The following, at least, should be proactively considered:

- The brownfield site register includes two car parks in Horley. The HELAA only one. Both could be developed, re-providing the same/reduced level of parking, if required.
- Above Donyings Car Park (making car park multi-storey), as part of re-design of Donyings Roundabout. Overflow carpark.
- Reigate station car park

#### Town Centre sites

Use compulsory purchase to bring forward potential development above existing retail buildings (estimate 50-100 units) such as:

- Above Wilkinson's (Redhill) – Estimate 4-6 units.
- Above Boots the Chemist block – currently 2 storey (Redhill)
- Above Parade with Dominos and Burger King – currently 2 storey (Redhill) – proposed to consider as part of a more comprehensive development at this site, as noted below.
- Above the brick-built two storey block including the Salvation Army shop to 3-4 storeys. Estimate 4-6 units
- Above (or redevelop with additional storeys) the block including Barclays Bank. Estimate 12 units.

Rear of shop buildings/etc:

- Redhill Town Centre, Rear of West Central could support a development combining community use (lacking in Redhill town centre plans) and estimated 15 dwellings above.
- Additional units (to complete this rear streetscape, which would be visible alongside the proposed Marketfield Way development could continue towards the Abbots Pub end of Station Road. Estimate 6-12 units.
- Other locations, such as the 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. 40.

Existing space over shops. We requested at Reg18 that the DMP include a survey of first-floor current usage 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 conversion of space above shops into residential units should be positively supported in the plan. Examples: space above Nat West Bank in Redhill, above individual shops. Could be identified by centre. Estimated potential: 10 units/year over plan period.

We summarise the potential additional housing delivery identified in this response in the following table (assuming 9 years remaining in plan period):

Site Category	Increased number of dwellings over plan period
Increased density in urban sites	600
Delivery of self-build on small sites (25/year)	200
Increased office-residential conversion	0-150
Other known sites currently promoted	150-190
Additional car park sites, including smaller sites	50-80
Town centre sites	50-100
Above shops	50-80
Bringing forward sites not currently noted as deliverable (including via Brownfield Site Register)	100-200
Legal and General Site	Not considered
<b>TOTAL</b>	<b>1200 – 1600</b>

This suggests that through increasing density, deliverability and bringing forward other more complex and imaginative urban sites, the full delivery of the Development Management Plan could utilise urban brownfield sites. This will remove the need for any allocation of sustainable urban extensions within the Plan period, whilst providing more affordable and sustainable homes.

## Section D. Concluding Points

Urbanisation of the Home Counties is not a sustainable development strategy, for Reigate and Banstead or the in terms of wider planning policy for the UK. We believe that it is the combination of urban and rural that creates the values that we believe give our area its character, which should be protected. That includes green spaces, rural-urban linkages (as now emphasised internationally in the New Urban Agenda, linked to Sustainable Development Goal 11, to which the UK is a signatory).

You cannot look at urban areas exclusively and just see the countryside as something that is waiting to be colonised. The rural needs to be recognised as having intrinsic value in its own right. It is the functional linkages (economic, social, environmental interactions – not roads) that are important. The two sustain each other. For example, food security, water, clean air, recreation and access to nature, are all at threat from over-urbanisation not just here but across the South East, because of the urban-centric nature of the UK economy.

The current Development Management Plan (Regulation 19 consulted version) risks undermining the core nature of this area. It envisages removing Green Belt protection from land next to Redhill, Reigate and Merstham, to create ‘urban extensions’ of 1000-1400 new homes in line with the Core Strategy. **This is no longer required** due to recent planning completions, increasing density in line with that in other plans (with density policy), inclusion of sites currently being marketed by developers and in the Brownfield Site Register – even before the additional sites listed above are considered.

We have identified an additional 1200 – 1600 homes that are deliverable in the plan period in the urban areas of the borough. This removes the need for any Green Belt release to be considered in the plan period. **Therefore all the SUE sites can, and should, be removed from the Local Plan.**

This approach, together with a more realistic affordable housing target, that matches developer viability with our residents' housing need, will increase the affordability of homes delivered over the plan period.

Finally, there is no need to either safeguard land around Redhill Aerodrome for development and it is inappropriate to include the Horley Business Park proposals in the DMP.

The additions and deletions proposed in this response would enable the Borough to develop in a more sustainable way, in accordance with local needs, while protecting the countryside, and London's Green Belt, for future generations.

To discuss the contents of this document, contact  
Cllr Jonathan Essex, [jonathan.essex@greenparty.org.uk](mailto:jonathan.essex@greenparty.org.uk)  
39 Common Road, Redhill RH1 6HG

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