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Reigate & Banstead
BOROUGH COUNCIL
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BOROUGH WIDE LANDSCAPE & TOWNSCAPE CHARACTER ASSESSMENT

Assessment of Development Potential
and Policy Recommendations

FINAL REPORT

JUNE 2008



Borough Wide Landscape and Townscape Character Assessment

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Reigate and Banstead Borough Council

June 2008

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List of Abbreviations

AAP Area Action Plan

AGLV Area of Great Landscape Value

AONB Area of Outstanding Natural Beauty

AQMA Air Quality Management Area
BNL Basic Noise Level
CHP Combined Heat and Power
CPZ Controlled Parking Zone
CRTN Calculation of Road Traffic Noise
EAA Energy Action Area
GSHP Ground Source Heat Pumps
LDF Local Development Framework
LFG Landfill Gas
MSW Municipal Solid Waste
NEC Noise Exposure Category
PPG Planning Policy Guidance Note
PPS Planning Policy Statement
PTAL Public Transport Accessibility Level
RASC Residential Area of Special Character
RBBC Reigate and Banstead Borough Council
ROC Renewables Obligations Certificate
SAC Special Area of Conservation
SCC Surrey County Council
SPD Supplementary Planning Document
SSSI Site of Special Scientific Interest
SUDS Sustainable Urban Drainage System

1. INTRODUCTION

INTRODUCTION TO THE STUDY

- 1.1 Reigate & Banstead Borough Council (RBBC) is currently preparing key documents for their Local Development Framework (LDF) including the Core Strategy and Area Action Plan (AAP) for Redhill. Under the new planning system, these documents must be based on a robust and credible evidence base.¹ As part of this process, the Borough has identified a need for additional background information to inform a number of related activities including preparation of parking and transport strategies, work on renewable energy, regeneration initiatives and development control.
- 1.2 Atkins Ltd was commissioned by RBBC to carry out a wide-ranging study of the Borough's landscape and townscape character and potential for development. The study was divided into two phases as follows:
- Phase 1: A local landscape and townscape character assessment for the Borough; and
 - Phase 2: Policy analysis and recommendations consisting of: Phase 2A - a strategic assessment of development potential; and Phase 2B – policy recommendations.
- 1.3 The first phase of the study provides a comprehensive, descriptive analysis of the Borough's landscape and townscape character areas. The purpose of this phase was to:
- Raise the general awareness in the planning process of the importance of landscape and townscape character in contributing to quality of life recognising: both the differences and similarities between places; what gives different places their special local identity and distinctiveness; the need to protect, maintain and enhance special and valued characteristics; that development needs to be sympathetic to these special qualities; the need to actively improve the quality of places through good design;

¹ PPS 12: Local Development Frameworks, Paragraph 4.24, 2004

- Help inform the formulation of character-based landscape and townscape/design policies in the LDF;
 - Provide the spatial framework for considering the landscape and townscape implications of options for different scales and patterns of strategic development in the LDF;
 - Help inform development control decisions about proposals for built development and other forms of land use change;
 - Inform the Strategic Environmental Assessment and evidence base of the LDFs of the impact of new development on landscape character;
 - Provide a framework for the Phase 2 strategic assessment of development potential as well as more detailed studies to enhance the evidence base;
 - Inform design guidance to promote higher quality landscape design; and
 - Provide a baseline for monitoring the impact of new development on landscape and townscape character and quality.
- 1.4 The findings of Phase 1 are set out in the “Borough Wide Landscape and Townscape Character Assessment”.
- 1.5 This report presents the findings of Phase 2, the strategic assessment of the Borough’s potential to accommodate residential development. This part of the study sought to identify the most suitable broad locations for development in terms of: the Borough’s townscape character and sensitivity to change; accessibility to a range of facilities and services; the need to maximise the use of renewable energy; and the need to address local social, economic and environmental issues. The analysis sought to identify the ways in which development could contribute to achieving wider aims of sustainable development including social and economic regeneration (Phase 2A). The assessment was used to formulate policy recommendations to inform the LDF, and in particular the Borough’s emerging Core Strategy (Phase 2B). Recommendations are made covering:
- The overall spatial strategy for the Borough and broad locations for housing delivery;
 - The density of development related to accessibility;

- Protection and enhancement of landscape and townscape character;
 - Encouraging use of sustainable transport modes;
 - Parking management including suitable areas for Controlled Parking Zones (CPZs) and graded parking standards for development;
 - High quality, sustainable design; and
 - The use of renewable energy technologies at different development scales and in different types of location.
- 1.6 There is also a recognition that development can help in addressing environmental issues, although these have not been considered in detail in this study. Examples include opportunities to de-contaminate land, provide green corridors for wildlife and provide space for water in appropriate locations to address local flooding issues.

POLICY CONTEXT

- 1.7 This study has been carried out within the context of the Borough's emerging planning policy framework and builds on the Borough's existing strategic approach. The relevant planning policy framework is made up of national, regional, countywide and local policy, and the key policy documents are summarised below. Appendix A provides a comprehensive list of relevant policy documents.

National Policy and Guidance

PPS1

- 1.8 Planning Policy Statement 1 (Delivering Sustainable Development) sets out the Government's overarching policies for the planning system. The general approach to the preparation of development plans includes the need to:
- Promote urban and rural regeneration to improve the well being communities;
 - Promote communities which are inclusive, healthy, safe and crime free;
 - Bring forward sufficient land of a suitable quality in appropriate locations to meet development needs;

- Provide improved access for all to jobs and facilities by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car;
- Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development;
- Promote efficient use of land through higher density, mixed use development and the use of suitably located previously-developed land and buildings; and
- Enhance as well as protect biodiversity, natural habitats, the historic environment and landscape and townscape character.

1.9 Promoting high quality design is a key theme of PPS1. Design which fails to take the opportunities available for improving the character and quality of an area, or which is inappropriate in its context, should not be accepted. Planning policies should seek to protect and enhance the quality, character and amenity value of urban areas as a whole, and a high level of protection should be given to the most valued townscapes. Planning authorities should prepare robust policies on design and access based on stated objectives for the future of an area and an understanding and evaluation of its present defining characteristics. Key objectives should include ensuring that developments respond to their local context and create or reinforce local distinctiveness.

1.10 The recent supplement to PPS1 (2007) emphasises the role of planning in tackling climate change. It encourages local authorities to provide a framework that promotes and encourages renewable and low-carbon energy generation. They are asked to consider identifying suitable areas for renewable and low-carbon energy sources and supporting infrastructure where this would help secure development of these sources.

PPS3

1.11 Planning Policy Statement 3 (Housing) sets out the Government's key housing policy goal, which is to ensure that everyone has the opportunity to live in a decent home, which they can afford, in a community where they want to live. Specific PPS3 housing policy outcomes that are relevant to this study include delivering through the planning system:

- Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure; and

- A flexible, responsive supply of land, including re-use of previously developed land, where appropriate.
- 1.12 PPS3 states that Local Development Documents (LDDs) should set out a strategy for the planned location of new housing which contributes to achievement of sustainable development. More specifically it states that local planning authorities should, working with stakeholders, set out the criteria to be used for identifying broad locations and specific sites for housing taking into account:
- The spatial vision for the local area (having regard to relevant documents such as the Community Strategy) and objectives set out in the relevant Regional Spatial Strategy;
 - Evidence of current and future levels of need and demand for housing as well as the availability of suitable, viable sites for housing development;²
 - The contribution to be made to cutting carbon emissions from focusing new development in locations with good public transport accessibility and/or by means other than the private car, and where development can readily and viably draw its energy supply from decentralised energy supply systems based on renewable and low-carbon forms of energy supply; and
 - Accessibility of proposed development to existing local community facilities, infrastructure and services, including public transport. The location of housing should facilitate the creation of communities of sufficient size and mix to justify the development of, and sustain, community facilities, infrastructure and services.
- 1.13 PPS3 also emphasises the aim of creating places, streets and spaces which have their own distinctive identity and maintain and improve local character. Local Planning Authorities should facilitate good design by identifying the distinctive features that define the character of a particular local area. Careful attention to design is particularly important where the chosen local strategy involves intensification of the existing urban fabric. More intensive development is not always appropriate, although it can enhance the quality and character of an area if well sited and designed.
- 1.14 PPS3 also states that LPAs should develop density policies³, which may include setting a range of densities across the plan area, having regard to a range of factors including:

² Need and demand for housing are not directly considered by this study, but are being assessed through a range of parallel studies as described in Appendix A.

- The spatial vision and strategy for housing development in their area, including the level of housing demand and need and the availability of suitable land in the area;
 - The current and future level and capacity of infrastructure, services and facilities such as public and private amenity space, in particular green and open space;⁴
 - The desirability of using land efficiently and reducing, and adapting to, the impacts of climate change;
 - The current and future levels of accessibility, particular public transport accessibility; and
 - The characteristics of the area, including the current and proposed mix of uses.
- 1.15 It states that where Local Planning Authorities wish to plan for, or agree to, densities below the minimum of 30 dwellings per hectare, this will need to be justified having regard to the above factors.
- 1.16 Local planning authorities should also develop residential parking policies for their areas taking into account expected levels of car ownership, the promotion of good design and the need to use land efficiently.

PPS7

- 1.17 Planning Policy Statement 7 (Sustainable Development in Rural Areas) states that Local Planning Authorities should prepare policies and guidance that encourage good quality design throughout their rural areas, utilising tools such as landscape character assessments. The statement confirms that nationally designated areas including Areas of Outstanding Natural Beauty (AONB) have the highest status of protection in relation to land and scenic beauty and should therefore be given great weight in planning policies and development control decisions. In terms of local landscape designations, PPS7 advocates the use of carefully drafted, criteria based policies in LDDs (utilising landscape character assessment). It states that the local landscape designations should only be included in LDDs where it can clearly be shown that criteria-based planning policies cannot provide the necessary protection.

³ PPS3 states that 30 dwellings per hectare (dph) would be used as a national indicative minimum to guide policy development and decision-making, until local density policies are in place.

⁴ These issues are not directly considered by this study, but are being assessed through a range of parallel studies as described in Appendix A.

PPG13

- 1.18 Planning Policy Guidance Note 13 (Transport) states that local authorities should accommodate housing principally within existing urban areas, planning for increased intensity of development at locations which are highly accessible by public transport, walking and cycling. Parking policies should be used, alongside other planning and transport measures, to promote sustainable transport choices and reduce reliance on the car.

PPS22

- 1.19 Increased development of local renewable energy resources is vital to facilitating the delivery of the Government's commitments on both climate change and renewable energy. Planning Policy Statement 22 (Renewable Energy) sets out the role of the planning system in facilitating renewable energy developments. PPS22 states that local landscape and local nature conservation designations should not be used in themselves to refuse planning permission for renewable energy developments. It also states that local planning authorities and developers should consider the opportunity for incorporating renewable energy projects in all new developments, and that local planning authorities should specifically encourage such schemes through positively expressed policies in local development documents. Further detail is provided in Section 6.

Regional Policy and Guidance

Draft South East Plan

- 1.20 The Draft South East Plan sets RBBC a housing allocation of 7,740 units to be built between 2006 to 2026. The plan has recently been through an examination in public and is scheduled to be adopted in Autumn 2008. The Panel Report into the draft South East Plan has suggested an increase in the Borough's allocation to 9,240 dwellings (an increase of 1,500). The report recommends that the increase in housing provision be accommodated in the London Fringe part of the Borough⁵. The Panel considered it reasonable to set a more challenging figure in order to drive the urban renaissance of Redhill and to reflect the potential that is evident from the recent rates of housing completions in the Borough as a whole. The Report states that a small scale local review of the Green Belt may be necessary at Redhill-Reigate. The implications of this are discussed in paragraph 1.36 below.

⁵ The part of the Borough north of Salfords falls within the London Fringe sub-region, the remainder falls within the Gatwick sub-region.

- 1.21 The potential for a higher allocation reinforces the need to address the necessary long-term infrastructure requirements to support housing delivery. The final allocation will not be known until the South East Plan is adopted.
- 1.22 The Draft South East Plan states that town centres should be developed as multi use nodes to enable people to shop, work, live and visit other services without having to make multiple journeys, and that urban areas should be the prime locations for new development and redevelopment. Policy H3 (The Location of Housing) states that housing developments should be located in sustainable locations, which have the necessary infrastructure, services and community provision. The policy also states that housing developments should generally be in locations that are, or can be, well served by a choice of transport modes, with higher densities and near locations well served by public transport. Policy T1 requires LDDs to ensure that their management policies and proposals achieve a rebalancing of the transport system in favour of non-car modes as a means of access to services and facilities.

Local Policy

Surrey Structure Plan (2004)

- 1.23 The Surrey Structure Plan was adopted in 2004 and sets out the strategy for the development of the County. Under the Planning and Compulsory Purchase Act 2004, the Plan will be replaced by the South East Plan when it is adopted. This is expected in autumn 2008. The Structure Plan includes a range of policies of relevance to the study, including policies on the location of development, housing and parking. A Parking Strategy for Surrey was adopted as an SPG in March 2003, and provides detailed guidance on parking provision in the County.

Reigate and Banstead Borough Local Plan 2005

- 1.24 The Local Plan was published in September 2005. It is comprised of the First Alteration adopted in 2005, combined with the unaltered parts of the 1994 Borough Local Plan adopted in 1994. Under the Planning and Compulsory Purchase Act 2004, policies in the Local Plan can be saved for three years from either the date of the Act or from the date of their adoption. The three year period was intended to allow local authorities to develop their new style planning policy documents, starting with the Core Strategy. However, in practice the new system has not progressed as quickly as it had been hoped, and RBBC applied to the Government to have most of the policies saved until they are replaced by the LDF. The Government Office for the South East has now responded setting out which policies are saved, many of which are of particular relevance to this study. They include the following topics:

- Protection of existing character: policies providing protection for areas with high landscape and nature conservation value and Urban Open Land, policies on countryside management, policies which protect areas with historic or archaeological value;
- Countryside: policy on the setting and maintenance of the Green Belt;
- Housing: policies covering issues such as affordable housing, density, mix, design and layout, the housing environment, maintaining character and amenity including in Residential Areas of Special Character;
- Employment: policies related to the protection of employment land, town centre development, areas for small business and mixed use schemes;
- Retail: policies setting out the general approach to retail provision and new development;
- Recreation: policies related to retention and provision of recreation and leisure uses and open space;
- Community facilities: policies seeking to retain existing facilities and provide additional facilities where required;
- Transport: policies related to car parking and public transport; and
- Location-specific policies: a range of local policies for Redhill, Reigate and Horley.

Core Strategy

1.25 As mentioned above, RBBC is currently preparing a Core Strategy for the Borough. In May 2006 the Council consulted on Preferred Options for the Core Strategy. This document set out a spatial strategy for the Borough which included the following key policy approaches which are of particular relevance to this study:

- To direct higher density development to Redhill and along the A23 corridor, formulating appropriate density ranges for these areas and the rest of the Borough. (The approach of directing higher density development to the A23 corridor has not been supported by the analysis of the Borough's accessibility and the interpretation of the County Council's approach to density and parking - see Sections 3 and 7);

- A plan, monitor, manage approach to housing development to ensure that development does not outstrip the capacity of local infrastructure and services;
- To continue to protect and enhance the Borough's landscape, natural and built environment;
- To require high quality, sustainable design;
- To work with partners to bring forward sustainable transport initiatives; and
- To reinforce the role of town centres and local shopping areas, make best use of employment land and encourage regeneration of deprived areas. Key regeneration areas have been identified at Redhill and Horley Town Centres, Preston and Merstham.

Redhill Town Centre Area Action Plan

1.26 The Council is also preparing an AAP for Redhill Town Centre, and consulted on Preferred Options in May 2006 in tandem with the consultation on the Core Strategy. The preferred options consultation document set out a framework for the regeneration of Redhill through:

- Promoting leisure, community and cultural facilities;
- Encouraging residential development;
- Diversifying office accommodation;
- Providing high quality and distinctive public spaces and improvements to movement to and within the centre;
- Protecting existing retail; and
- Improving transport interchange facilities.

1.27 The preparation of the Redhill Town Centre AAP is now being steered by a comprehensive master planning process to be undertaken during 2008.

New Growth Points Status

- 1.28 RBBC was awarded Growth Point Status in September 2006. This initiative is designed to provide support to local communities who wish to pursue large scale and sustainable growth, including new housing, through a partnership with Government. As a Growth Point, the Council is committed to frontloading its draft South East Plan housing allocation of 7,740 by delivering at least 500 new homes per annum up to 2016 and 274 thereafter to 2026, in return for additional Government funding to support the housing growth. Funding is available for infrastructure projects and growth-related studies, master planning and capacity-building to support development. The first round of New Growth Point funding has resourced the projects designed to reduce traffic congestion:
- Extension of the fastway bus service from Horley to Redhill to include East Surrey Hospital;
 - Developing bus priority measures for the A23;
 - Remodelling and improving Redhill Town Centre to facilitate bus use and interchange; and
 - Reviewing transport issues in Redhill town centre to facilitate regeneration proposals including the redevelopment of the Warwick Quadrant.
- 1.29 The successful 2007 New Growth Point grant of £2m from Department of Communities and Local Government has allowed the Council to deliver the nationally acclaimed Waterwise resource management project in Preston, as well a raft of transport improvements including the extension of the Fastway Express bus service from Horley to Redhill. To facilitate Fastway there will be civil engineering works along the A23, introduction of Real Time passenger information, intelligent bus priority signalling and new state-of-the-art buses. The extensive refurbishment of Redhill Bus interchange is due to start in early February 2008 and will be completed in May 2008.
- 1.30 Building on the success of the first bid, the Borough and their partners submitted a second bid and have been awarded a sum in the region of £5.3m covering the next 3 years. This sum will be used for a range of infrastructure improvements needed to support the delivery of housing growth in the Borough. Projects that could be supported include improvements to the public areas of Redhill and Horley, support for new cultural, leisure and medical services, further improvements to transport infrastructure and strategic land acquisitions to bring forward growth.

RBBC Housing Trajectory

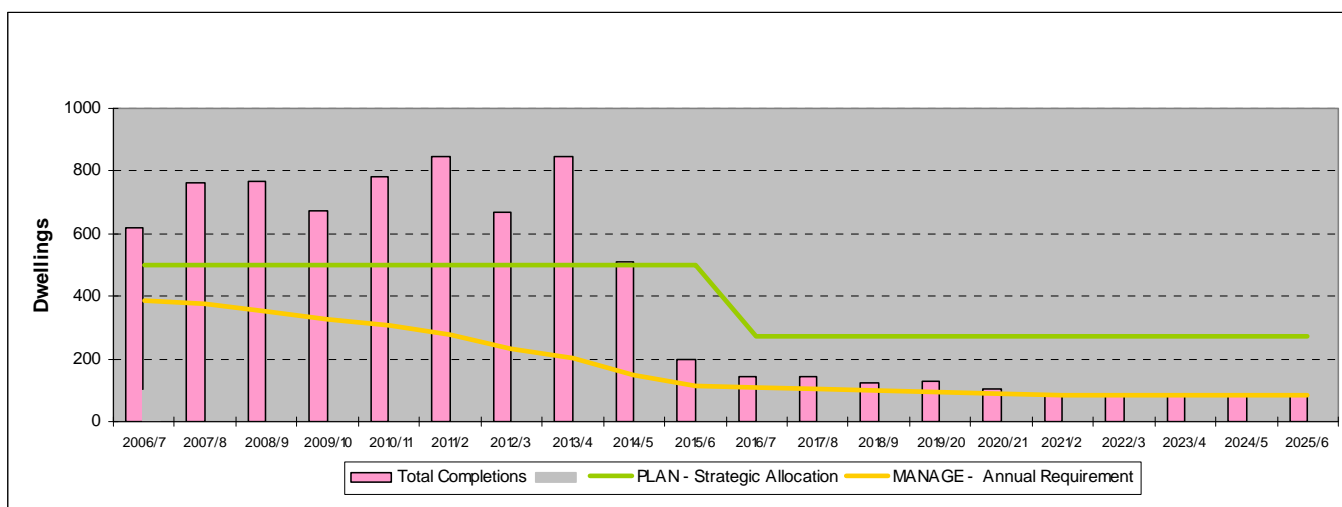
- 1.31 In accordance with PPS3, the Borough is required to identify broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption. More specifically, LPAs should identify sufficient specific deliverable⁶ sites to deliver housing in the first five years, identify a further supply of specific, developable⁷ sites for years 6-10 and, where possible for years 11-15. Once identified, the supply of land should be managed in a way that ensures that a continuous five year supply of deliverable sites is maintained - i.e. at least enough sites to deliver the housing requirements over the next five years of the housing trajectory.
- 1.32 A summary of the housing trajectory is illustrated in Figure 1.1 below. The graph shows the projected front-loading of housing delivery against the draft South East Plan allocation over the next two decades. As mentioned above, Reigate and Banstead's allocation is likely to increase when the South East Plan is adopted, leading to changes in the housing trajectory.

⁶ Deliverable sites are those that are:

- Available – the site is available now
- Suitable – the site offers a suitable locations for development now and would contribute to the creation of sustainable, mixed communities
- Achievable – there is reasonable prospect that housing will be delivered on the site within five years.

⁷ Developable sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available for, and could be developed at the point envisaged.

Figure 1.1: Reigate and Banstead Housing Trajectory 2006 - 2026



1.33 The Borough has a substantial bank of current permissions from which it is estimated over 3,000 units have been or will be delivered between 2006 and 2020. These include large-scale developments at Netherne and three employment sites in Redhill (Hooley Lane, Holmethorpe and Park 25). The two new neighbourhoods in the north of Horley and regeneration of the town centre involving the delivery of 2,600 units is another key part of the development strategy, in line with the adopted Local Plan and a range of SPDs.

1.34 The housing trajectory also envisages substantial residential development and the three key regeneration locations as follows:

- The regeneration of Redhill town centre which is anticipated to deliver over 1,000 units; and
- The regeneration of the deprived wards of Preston and Merstham, planned to deliver nearly 500 units in total for both areas.

Planning Obligations

1.35 Based on a collaboration project between Surrey authorities, the Council has been implementing a Code of Practice from 1 November 2007, seeking contributions using a defined methodology for all schemes involving 1 to 14 additional dwellings or for additional commercial floorspace (as a guide this is where it will result in additional employees). Contributions are being sought towards County Council services (highways, transport and travel schemes, education and libraries) and Borough Council services (recreation, community centres and recycling). For new dwellings, contributions are likely to be in the range of £6,500 for a one bedroom unit, £11,000 for a three bedroom unit, and £17,000 for a five bedroom unit. The Council's

Executive in December 2007 approved a draft SPD for consultation, which also proposes a contribution towards primary health care. This SPD expands upon a Surrey County Council (SCC) policy and will be replaced once there is an adopted policy in the Core Strategy.

PREPARATION OF THE LDF AND THE ROLE OF THIS STUDY

- 1.36 The requirements of the new planning system are currently being explored as Development Plan Documents (DPDs) are examined and inspectors provide advice on their “soundness”. Based on this emerging experience, the Council has decided to re-issue and re-consult on preferred options for both the Core Strategy and the Redhill Town Centre AAP. The findings of this study will be used as background evidence for developing Preferred Options and will feed into the preparation of these revised documents.
- 1.37 A summary of other relevant policy, guidance and research undertaken to inform the Core Strategy and Redhill Town Centre AAP is included in Appendix A. The extent to which this research has informed this study, and the extent to which this study can inform ongoing and future research, is explained in the body of this report.

STUDY METHOD AND REPORT STRUCTURE

- 1.38 This study has considered a range of issues to arrive at policy recommendations to inform a spatial strategy for the Borough. The study has involved a comprehensive strategic review of the Borough’s development potential, assessing the emerging policy context and making recommendations. It has sought to identify areas where it would be appropriate to promote development to achieve wider sustainability objectives, including environmental, economic and social objectives. The study has been carried out through a number of steps as follows:
- The landscape and townscape character assessments carried out in Phase 1, which included consideration of development pressure and sensitivity to change, were converted into “traffic-light” mapping, identifying the different levels of development potential across the Borough. The analysis was supplemented with information from the local plan and area-specific surveys. This part of the study is explained in detail in Section 2;
 - The accessibility of areas with development potential to both local facilities and to wider locations was assessed, again using the traffic light system. Indicative Parking Package Areas were defined to provide a guide to the different levels of accessibility in the Borough (see Section 3);

- A strategic assessment of the noise constraints affecting development within the Borough was carried out. The assessment identified the key noise sources as road, rail and air traffic, and includes diagrammatic map of the areas where noise issues would need to be considered (see Section 4);
- Section 5 sets out a similar analysis for air quality, again including a map showing areas where proposals for development will need to address air quality issues;
- A strategic analysis of the possible use of renewable energy in the Borough including Combined Heat and Power (CHP) is set out in Section 6;
- Section 7 combines the results of the various assessments to provide a strategic analysis of the development potential of the Borough, including highlighting the areas with the most potential for accommodating development;
- Section 8 explores these areas in more detail, and provides indicative information on possible dwelling yields and issues;
- Section 9 considers areas where CPZs could be considered; and
- Section 10 draws together all the findings of Phases 1 and 2 of the study to provide policy recommendations.

Focusing Development within the Existing Urban Area

- 1.39 As explained above, the housing trajectory demonstrates how the South East Plan's housing targets for the Borough will be met up to 2026 through existing permissions, local plan allocations and redevelopment in regeneration areas. The South East Plan Panel Report recommended a higher allocation for Reigate and Banstead, and advised that a review of the Redhill/Reigate Green Belt may be necessary.
- 1.40 Further analysis carried out by RBBC has shown that the increased allocations recommended by the Panel Report can be comfortably accommodated within urban areas without the need to review the Green Belt. The landscape character assessment showed that all of the Borough's rural areas fall within one or a number of planning, landscape or environmental designations (i.e. Green Belt, Areas of Outstanding Natural Beauty (AONB), Areas of Great Landscape Value (AGLV), Special Areas of Conservation (SAC), Rural Surrounds of Horley, Sites of Special Scientific Interest (SSSI), Flood Plain Zones 2, 3a and 3b, Sites of Nature Conservation Importance (SNIC), Local Nature Reserves and Ancient Woodlands).

As such, none of these areas were assessed as being suitable locations for accommodating large-scale residential development.

- 1.41 This study has therefore focused on the development potential of the urban area outside the Green Belt. Should a need be identified to explore further potential in the future, the updated findings of this study could be used as a useful part of the analysis.

2. LANDSCAPE AND TOWNSCAPE CHARACTER ASSESSMENT AND DEVELOPMENT POTENTIAL

INTRODUCTION AND METHOD

- 2.1 The first step in the strategic examination of the Borough's development potential was to explore how the character of the Borough's urban and rural areas, as assessed in Phase 1 of the study, affects their potential to accommodate development.
- 2.2 Phase 1 assessed the different parts of the Borough in terms of their 'sensitivity to change'. This takes into account the following three basic elements:
- Character - which is a value-free description of the features which make a place different from other places e.g. the pattern of landform, built form, streetscape etc;
 - Quality - which is a judgement, and relates to the physical state of the landscape or townscape. It also involves a judgement about the intactness and state of repair of the various elements which make up an area; and
 - Value - which is also a judgement, although it is based upon the relative value attached to a landscape or townscape: either through recognised designations such as Conservation Areas, or through less easily ascertained factors such as cultural associations which a place may have.
- 2.3 Taking all three of these factors into account, the character, quality and value of a place is summarised by its 'sensitivity to change', i.e. to what degree a place is sensitive to change occurring. A high rating indicates that change or development should be managed particularly sympathetically to avoid a place losing key characteristics. This method was chosen for the landscape and townscape character assessment in Phase 1 as sensitivity to change is the most simple way to understand how character will be impacted by development. A low rating means that an area is less sensitive to change. However, this does not mean that lower quality design would be acceptable in these areas.

2.4 The assessment of sensitivity to change was converted into an indication of development potential for residential and mixed use development as follows:

- Low sensitivity to change – locations likely to have most development potential where opportunities should be explored (green);
- Low sensitivity to change - locations potentially with small/medium scale opportunities⁸, and where development could enhance townscape quality (amber/green);
- Medium/low sensitivity to change – locations potentially providing development opportunities often of small to medium scale; development could enhance townscape quality (amber/green);
- High/medium sensitivity to change – locations potentially providing development opportunities predominantly of a small to medium scale; development should respect existing townscape (amber/red); and
- High sensitivity to change – Conservation Areas, Areas of Special Residential Character and other high quality townscapes likely to have very limited development potential (red).

Urban Areas

Town Centres and Regeneration Areas

2.5 The Phase 1 townscape character assessment provided an analysis of the character of the Borough's four town centres (Reigate, Banstead, Redhill and Horley) and two housing estates identified as being in need of regeneration (Preston and Merstham) in terms of sensitivity to change. This analysis was converted into a guide to development potential using the method set out above.

2.6 The Local Plan, Supplementary Planning Documents (SPDs) and the Core Strategy were also reviewed, and any significant allocated sites were included as "green" areas with development potential.

Other Residential Urban Areas

2.7 Phase 1 of this study included a verification of the Local Distinctiveness Guide (2004), which categorises the townscape character of the urban area. These

⁸ Small scale is defined as up to 15 units, medium scale is defined as 15-50 units, large scale is defined as over 50 units

categories were then converted into a broad indication of development potential as set out in Table 2.1. The Residential Areas of Special Character (RASCs) were reviewed as part of Phase 1 of the study. It was confirmed that these areas have a number of specific characteristics and are of high sensitivity to change.

Table 2.1 - Townscape Character Assessment and Likely Development Potential

Townscape Character Areas	Sensitivity to Change and Likely Development Potential
Conservation Areas and Residential Areas of Special Character	Recognised high quality, high sensitivity to change, likely limited development potential (red)
Pre-Victorian Development, Victorian/Edwardian Development and 1930s-1950s suburbia	High/medium sensitivity to change, potentially with small/medium scale development opportunities, development should respect existing townscape (amber/red)
1960s, 1970s and 1980-90s modern estates	Medium/low sensitivity to change, potentially with small/medium scale development opportunities, development could enhance townscape quality (amber/green)

2.8 It is important to note that the classification set out above provides a strategic overview of sensitivity to change due to character. There will, of course, be variation within the broadly defined areas. However, the classification is a useful starting point for considering the Borough's likely potential for residential development.

2.9 As with the town centres, the Council's adopted Local Plan, SPDs and the emerging Core Strategy and Redhill town centre AAP were reviewed to ensure that all significant areas and sites identified for development had been classified as having development potential as appropriate.

Community/Institutional Sites and Land in Public Ownership

2.10 A map-based review of the urban area outside the town centres was carried out, and types of areas with possible development potential were identified. This led to the identification of areas with clusters of institutional uses, community facilities and other uses where redevelopment for a mix of uses, including re-provision of existing facilities, could lead to the delivery of housing units. Redevelopment of these areas would depend on the requirements and aspirations of current users. The identified areas were:

- Linkfield Corner and adjacent leisure centre and Territorial Army Centre sites, Redhill;

- Croydon Road area, Reigate – including Surrey Fire and Rescue Services and Coleman Redland Centre; and
- Banstead Horseshoe area.

2.11 It should be noted that a comprehensive review of development potential is beyond the scope of this strategic study, and it is possible that there may be further opportunities for this type of redevelopment elsewhere in the Borough. Discussion with the estates managers responsible for land in public ownership such as SCC and RBBC, as well as the Raven Housing Trust, could lead to the identification of further potential.

Employment Land

2.12 Reigate and Banstead's adopted Local Plan includes a number of allocations for existing and proposed employment uses as follows: employment areas; land reserved for industrial, storage and distribution uses; and areas for small businesses. Some of these areas may be targeted by developers for residential development and some key employment sites have been released for housing in recent years. However, loss of employment land must be balanced against the Council's aim to maintain strong economic growth within the "Gatwick Diamond". In line with Government guidance, an Economic Market Assessment incorporating an Employment Land Review is currently underway to estimate the future need for employment land and premises. This work will provide clear information about the potential for residential and mixed-use development within employment areas.

DEVELOPMENT POTENTIAL

Overview

2.13 Figure 2.1 illustrates the results of the analysis. The figure shows that areas with most development potential are focused within the town centres, within the Preston and Merstham neighbourhoods and in the two neighbourhood extensions in Horley. Opportunities within the rest of the urban area are more limited, due to the largely residential, consolidated nature of development and the high sensitivity of much of the Borough's townscape. However, these areas potentially provide opportunities for small and medium scale development. The more modern estates offer opportunities for environmental and townscape enhancements.

“Green” Locations with Most Development Potential

2.14 A number of areas were identified as being the locations with most potential where opportunities should be further explored. The following areas are already Council priorities for regeneration and development:

- Redhill town centre provides the Borough’s major development opportunity with much of the town centre assessed as having low sensitivity to change. This includes the main shopping and business areas, and areas running parallel to rail and road corridors including car parks, under-used sites and surplus land. The town centre offers a wide range of development opportunities and has the potential to accommodate significant mixed-use development and environmental improvements. Map-based and site surveys also identified the Linkfield Corner/Donyngs leisure centre area, which lies to the west of the centre, as having development potential;
- Horley town centre where some areas were assessed as being of low sensitivity, particularly parallel to the railway and the business/commercial area. These offer a wide range of opportunities for mixed-use development including retail, community facilities and housing. There is the opportunity for significant improvement to the environmental quality of the centre;
- The Preston and Merstham estates, which were assessed in detail and were categorised as being of low sensitivity to change. These 1960s and 1970s estates offer opportunities to achieve social and economic improvements in this areas which are in need of regeneration and environmental improvements, and offer redevelopment and refurbishment opportunities, including the De Burgh school site at Preston and the local centre at Merstham; and
- Two new neighbourhoods areas to the north of the town are allocated in the Local Plan.

2.15 Other areas were identified by this study as locations with possible development potential as set out in paragraph 2.10.

“Amber” Locations with Small to Medium Scale Development Opportunities

2.16 Most of the urban area has been classified as “amber” – areas with small to medium scale development potential (both “amber/green” and “amber/red”). These classifications apply to the residential areas outside the town centres and employment zones. “Amber/green” areas are mainly located at Redhill, Horley and the Mead Vale area on the southern side of Reigate. “Amber/red” areas cover a

substantial part of the Borough including much of the urban area north of the M25, Reigate and large parts of Redhill and Horley.

2.17 These “amber” areas offer the following types of development opportunity:

- Intensification of residential development – this can occur through conversion, infill, backland development and redevelopment. The older residential areas, particularly the pre-1930s development, offer the best potential for conversion, although there may also be conversion potential within the inter-war residential areas. Opportunities for infill, redevelopment and backland development depend on the nature of particular plots and buildings and will be found in various locations throughout these residential areas. Residential development from these sources is generally small scale and results in small numbers of additional units;
- Redevelopment of non-residential uses – the “amber” areas include a number of non-residential uses such as doctors’ surgeries, schools, recreation facilities, small scale employment uses, local centres and open space. Many of these uses are essential to the residential areas they serve and should be retained. However, there may be limited instances where sites can be intensified or redeveloped, for example where buildings are in poor condition and local facilities are being re-organised. This may offer potential for the development of additional residential units, possibly as part of a mixed-use scheme. These opportunities tend to be of small to medium scale; and
- Other underused land – the “amber” residential areas also contain small parcels of land which is not currently in use. These opportunities include land adjacent to infrastructure like railways. These types of site are often difficult to develop and can be severely constrained. However, a limited number of small to medium scale opportunities may exist.

2.18 The “amber” locations will thus offer a range of types of development opportunities. Within the “amber/green” areas there may be locations of lower quality townscape where it is appropriate for new development to diverge from the existing townscape characteristics. This could provide potential for higher densities and different development forms.

2.19 The “amber/red” areas, which tend to be more sensitive to change, may also have opportunities for increasing densities. In more sensitive areas development will need to be of a similar form and massing to ensure that the character of the area is respected. Examples may include low rise flatted development, terrace and mews development. However, the impacts of increased activity (e.g increased parking

provision) on townscape character will need to be carefully considered to ensure that development is acceptable.

- 2.20 The Local Distinctiveness Guide provides useful information on the development forms that are appropriate for different locations.

“Red” Locations with Limited Development Opportunities

- 2.21 A substantial part of the urban area falls within this category, reflecting the Borough’s many designated residential areas and recognised high quality townscape. The classification includes locations within all of the four town centres, much of northern and eastern Reigate, and large parts of smaller settlements, including Walton on the Hill, Kingswood, Chipstead High Road and western Merstham.
- 2.22 The recognised high townscape quality of these areas and their high sensitivity to change means that development opportunities are likely to be limited. However, there may be some opportunities of the type set out above for “amber” areas. Any development will need to respect and enhance the existing townscape.

3. ACCESSIBILITY

INTRODUCTION

Approach to Accessibility

- 3.1 Guiding development to locations which have high quality public transport provision, provide opportunities to walk and cycle, and reduce the need to travel is a fundamental objective of planning for sustainable development which flows through national, regional and local policy. It is essential that development is concentrated in accessible locations, enabling people to reach jobs, facilities and services by sustainable transport modes. The accessibility of different locations to a range of jobs, services and facilities is therefore a key element of the analysis of the broad potential of the Borough to accommodate development.
- 3.2 The study has considered two aspects of accessibility:
- Access to local facilities – local facilities are concentrated in town centres which provide a range of employment, retail, social and community facilities. The Borough's town centres have therefore been used as the basis for assessing accessibility to local facilities. They are Redhill, Reigate, Horley and Banstead. However, it should be noted that the Borough and its fringes have a range of local facilities located outside the four town centres. These include: shopping facilities at designated local centres and smaller centres; employment opportunities; primary schools; GP surgeries; and open spaces/recreational facilities. It should also be noted that nearby centres outside the Borough including Epsom, Sutton, Crawley and Dorking also provide facilities for Borough residents; and
 - Access to London and wider locations – the Borough's commuter rail network means that many locations provide sustainable access to the Capital. The unrivalled employment opportunities and facilities on offer in London mean that people living in locations with good sustainable access to commuter stations are likely to make a higher proportion of trips by non-car modes. The Borough's rail network also provides services south to locations including Gatwick, Brighton and the south coast, east to Kent and west to Guildford and Reading.

Planned Improvements to Transport Infrastructure

- 3.3 Surrey's Second Local Transport Plan 2006/7-2010/11 sets out the transport strategy for the County. The Transport Plan sets out a wide range of measures and projects to address transport issues in Surrey, focusing on tackling congestion, improving accessibility, improving safety and security, enhancing the environment and quality of life and improving management and maintenance of the transport network.
- 3.4 The preparation of a Transport Statement for the Borough will provide an opportunity to test whether the Borough's emerging spatial strategy for housing delivery (as set out in this document) will lead to an unacceptably adverse impact on the strategic road network and whether there are likely to be any adverse effects on the wider networks, both road and public transport. In liaison with the Highways Agency and SCC, the Transport Statement will identify any problems or concerns that may require specific mitigation or amendment to policies and proposals from a transport perspective.
- 3.5 The key planned transport measures for the Borough include:
- A range of measures focused at improving accessibility in Redhill/Reigate. This regional hub was identified as one of the County's key areas with transport problems. Measures include initiatives for positive congestion management, new and extended Quality Bus Partnerships and improved public transport interchanges and a range of cycle measures;
 - The A23 decongestion project (which is being delivered under the New Growth Points programme) which aims to facilitate housing growth, encourage modal shift and help reduce congestion. By May 2008 the project will deliver the extension of the existing Fastway bus service northwards from Horley to Redhill/Reigate, the implementation of a series of bus priority measures to facilitate this service and a new shuttle bus service for employees of companies participating in the EASIT scheme;
 - The Redhill Accessibility project, which is also funded through New Growth Points. This project will implement interim works to remodel and improve Redhill bus station to facilitate improved bus services and interchange, including for the Fastway service;
 - Improvements to the transport interchange at Horley station; and
 - The Fastway bus service will be extended to the new neighbourhoods at Horley as part of the comprehensive planning of the extension of the settlement.

ACCESS TO LOCAL FACILITIES

Access to Local Facilities by Public Transport

3.6 SCC has carried out a mapping exercise demonstrating access to town centres by public transport for the County. The data sets out contours showing the areas from which town centres can be reached within certain journey times. The County has advised that the time taken for public transport journeys to the centre was calculated by adding up the following times:

- The walking time from the origin of the journey to the nearest bus or station stop;
- Waiting times measured as half the headway time between services (representing the frequency of the services);
- Journey times;
- Walking times to destination; and
- The waiting / walking times at interchanges.

3.7 A preliminary examination of the accessibility mapping highlighted the following issues:

- The contours for Redhill town centre are focused on an area to the west of the centre rather than being focused around it, although the contours for other centres appear to be correct. (As an interim measure, Atkins has adjusted the contours for Redhill to ensure that they are focused on the town centre, but this is based on our knowledge of the area considering bus routes but not walking / journey times);
- Various technical issues related to the way the data is modelled; and
- The need to review the data in the light of the public transport improvements described above.

3.8 A thorough review of the County Council's data is a complex task, which is beyond the scope of this strategic study. It is recommended that the County Council is requested to review the accessibility mapping before the Core Strategy is submitted to Government to ensure that it is accurate and that appropriate amendments are made to the Parking Package Area analysis and analysis of development potential.

- 3.9 A summary of the accessibility information provided by the County is set out in Figure 3.1. Due to the issues with the data set out above, the map is diagrammatic and indicative, giving a broad indication of the accessibility of locations. The analysis of public transport accessibility may change when further data becomes available.
- 3.10 Unsurprisingly, the figure indicates that the areas close to the town centre are the most accessible, while the outer parts of the towns are reasonably accessible by public transport (within 30 minutes). Public transport services also appear to provide accessibility to town centres within 30 minutes for a range of suburban areas including: Nork, the northern part of Preston, Burgh Heath, Woodmansterne, Chipstead, Lower Kingswood, the parts of Merstham close to the A23, South Park, Woodhatch, Rushsetts Farm, White Bushes, Salfords and Wrays. The areas falling mainly outside the indicative 30 minute contour include Walton on the Hill, Tadworth, Kingswood and the eastern side of Merstham.
- 3.11 It is important to note that extension of the Fastway bus service north from Horley to Redhill and Reigate may improve bus accessibility at these settlements and along the A23 including East Surrey Hospital, as well as improving the quality of the service.
- 3.12 Figure 3.2 combines the accessibility to town centres data with the analysis of development potential based on townscape character set out in Section 2. Figure 3.2 shows that the areas classified as likely to have most development potential have varying levels of accessibility to local facilities. The town centre areas are well served, while Preston, Merstham and the fringes of Horley appear less well served, falling only partially within the indicative 30 minute public transport contour. As set out above, improvements to bus services to the new neighbourhoods at Horley are planned through extension to the Fastway service, and this will improve the public transport accessibility of these areas. Improvements will also be required to support further development at Preston and Merstham, and these are being considered as part of the planning of the regeneration of these areas
- 3.13 The majority of “amber” areas, classified as likely to have potential for small to medium scale development, fall within the 30 minute public transport contour. The main exception is Tadworth which has poor accessibility to town centres. The same is true of Walton on the Hill and Kingswood, which were classified as “red” areas.
- 3.14 It is important to note that the range of factors which influence the degree to which people use public transport services is not limited to frequency and journey times. Other factors include: the ability of people with mobility impairments to use buses; the affordability of fares; and times of operation, including evening services. Detailed analysis of services and usage could provide useful information to further inform analysis of accessibility to local facilities.

Pedestrian Access to Local Facilities

3.15 Walking is a key sustainable transport mode in the Borough, and encouraging trips on foot is an important part of transport policy. To assess pedestrian accessibility to local facilities, an approximation of the walk-in catchments of the Borough's town centres was drawn as follows:

- An 800m buffer zone from the edge of the town centre as an approximation for the ten minute walk-in zone; and
- A 1,600m buffer zone from the edge of the town centre as an approximation for the 20 minute walk-in zone.

3.16 It is important to note that the buffer zones indicate the outer-most limit of the walk-in catchments. This is because the buffer zone approach assumes that there is direct "as the crow flies" access to the town centre from any given point. However, in reality a pedestrian will rarely be able to walk directly from a given point to the edge of the town centre because the pedestrian network will normally involve more circuitous routes. The exceptions to this are locations on straight, arterial routes, which do offer direct "as the crow flies" access. Buffer zones must therefore be interpreted with caution and their limitations recognised. Further detailed work of the Borough's pedestrian network, including committed improvements to the pedestrian network, is required to establish the actual pedestrian catchments for the town centres both for the development of DPD's and SPD's and to support any planning applications.

3.17 Figure 3.3 shows the indicative walk-in catchments and Figure 3.4 compares these catchments with the development potential classification from Section 2. The figures demonstrate that many parts of the Borough fall within the 10 and 20 minute walk-in zones. This is true of most of Horley, Reigate, Redhill and Banstead. However, the following areas fall outside or on the fringe of the indicative 20 minute walk-in zone:

- The smaller settlements to the south west of Banstead including Woodmansterne, Chipstead and Hooley;
- The urban area south of Nork Park including Tattenham Corner, Burgh Heath, Tadworth, Kingswood and Walton on the Hill;
- Merstham;
- The southern part of Reigate (Rushetts Farm, Doversgreen, parts of South Park and parts of Woodhatch/Mead Vale);

- The smaller settlements along the A23 corridor of Whitebushes and Salfords; and
- The north west fringe of Horley;

3.18 Most of the areas identified as having development potential fall within the walk-in catchments. The exceptions are Preston, Merstham and the new neighbourhood on the north west side of Horley at Meath Green.

Cycle Access to Local Facilities

3.19 The Borough's town centres can also be reached by cycle. Whilst the importance of encouraging cycling is recognised, due to the need to simplify the data for this strategic analysis and the generally relatively low mode share of cycling, it was considered that focusing on public transport and pedestrian access would provide a clearer indicator of accessibility to local facilities. Analysis of the cycle access to town centres would be a useful piece of further detailed work which would further inform the accessibility analysis.

ACCESSIBILITY TO LONDON AND WIDER DESTINATIONS

3.20 Table 3.1 shows the Borough's railway stations and summarises the services to London arriving in the Capital between 8am and 9am on a weekday. The table shows that all of the Borough's stations provide a number of commuter services to London, with Redhill providing the most frequent and quickest access, while Reigate, Banstead and Epsom Downs have the fewest services to the Capital.

3.21 The table also indicates the stations which provide direct services to other major destinations. Again, Redhill has the best services, with direct connections to a wide range of destinations in all directions. Merstham has direct services to destinations to the east, south and southwest, while Earlswood, Salfords and Horley have direct services to destinations to the south and southwest, although in some cases direct services are very limited. Reigate has frequent direct services to destinations to the west and northwest. The stations in the northern part of the Borough are only served by direct services to London.

Table 3.1 - Summary of Weekday Peak Hour Services to London and Other Major Destinations

Station	No of services arriving in London between 8am and 9am	Journey Time to London	Other Major Destinations Served Directly
Banstead	3	40-55 mins	None
Epsom Downs	3	40-60 mins	None
Tattenham Corner	4	50-60 mins	None
Tadworth	4	45-55 mins	None
Kingswood	4	40-55 mins	None
Chipstead	4	35-45 mins	None
Merstham	5	30-40 mins	Gatwick, Crawley, Tonbridge, Brighton, Chichester
Redhill	8	30-40 mins	Various including Brighton, Guildford, Reading, Ashford, Portsmouth, Bedford, Luton
Reigate	3	35-55 mins	Guildford, Reading
Earlswood	5	40-45 mins	Gatwick, Crawley, Brighton, Chichester
Salfords	5	40-50 mins	Gatwick, Crawley, Brighton, Chichester
Horley	5	30-50 mins	Gatwick, Crawley, Brighton, Chichester, Portsmouth

Source: National Rail Enquiries

3.22 It must be noted that a wide range of factors influence the quality of rail services and their use. These include quality of stations and access to them, levels of overcrowding, reliability of services, times of day or week of services and speed of services. The north-south London to Brighton line is currently at capacity and is of particular concern given the growth of London, Brighton and Gatwick. Detailed analysis of train services and how they are used would provide further useful information on accessibility in the Borough to further inform the analysis of accessibility.

3.23 To provide a broad indication of the five and ten minute walk-in zones to the stations, 400m and 800m buffer zones have been drawn. The stations can be sustainably

accessed by bus and cycle, and the importance of encouraging these modes is recognised. However, given the likely relatively low share of these modes for trips to the stations, it was considered that focusing on travel by foot provides the most useful strategic indicator. As mentioned above, buffer zones provide only an approximation of walk-in zones and must be interpreted with caution. The accuracy of this indicative exercise would be improved by considering the location of station entrances and carrying out a detailed analysis of the pedestrian network.

- 3.24 It is also important to note that many people access the Borough's rail network by car. Provision of car parking at stations is an important issue in encouraging people to use the train.
- 3.25 Figure 3.5 illustrates the location of the Borough's stations and provides an approximation of five and ten minute walk-in catchments, and Figure 3.6 combines this information with the analysis of development potential set out in Section 2.
- 3.26 The figures show that many of the Borough's residential areas are well served, falling within the ten minute walk-in zones. The central and inner parts of Redhill, Reigate and Horley are accessible to the train stations, as are many of the residential areas in the northern part of the Borough. However, the location of Banstead station to the north west of the town centre means that only the north western part of Banstead falls within the walk-in catchment. Some of the outer parts of Redhill and Reigate area and the northern part of Horley are outside the walk-in areas, as are the new neighbourhoods at Horley, Preston and the eastern side of Merstham.

ACCESSIBILITY ASSESSMENT

- 3.27 In March 2003, SCC adopted "A Parking Strategy for Surrey" as an SPG to the Structure Plan. This is a non-statutory document, which sets out a strategy integrating parking policy with locational policy. The Surrey Structure Plan will be superseded by the South East Plan when it is adopted. However, the broad approach set out within the SPG is considered a useful way of assessing accessibility within the Borough. The SPG requires Local Authorities to classify the urban area in "Parking Package Areas", and the Reigate and Banstead Local Plan includes a commitment to do so. Parking Package Areas are defined as follows:
- Area 1 – Regional or major town centre, with high public transport accessibility (a hub for frequent bus and rail services);
 - Area 2 – Larger town centres and periphery of Area 1 centres, with good public transport accessibility (extensive network of bus routes and possibly suburban rail);

- Area 3 – Smaller town centres, urban fringes or inner suburbs, with moderate public transport accessibility (close proximity to suburban or radial bus or rail corridors); and
- Area 4 – Outer residential areas and isolated built-up areas, with low public transport accessibility (infrequent bus services or long walks to bus stops/rail stations).

3.28 Annex A of the Strategy explains that Parking Areas should be discrete, homogenous areas according to physical or policy boundaries, and sets out a method for defining them using three criteria:

- The position of the associated town centre in the retail hierarchy;
- Pedestrian accessibility to the town centre; and
- Public transport accessibility as shown on the Public Transport Accessibility Level (PTAL) model. Discussion with SCC officers suggests that thinking on this issue has developed since 2003. The County's current advice is to consider public transport accessibility to local facilities, rather than access to the public transport network as represented by PTALs.

3.29 It is beyond the scope of this strategic study to carry out a detailed classification of the Borough into Parking Package Areas. However, based on the available information, an indicative classification broadly based on the method set out in the Parking Strategy for Surrey is shown diagrammatically in Figure 3.7. As PTAL ratings for the Borough were not available, the public transport accessibility part of the analysis was based on the information on public transport accessibility to town centres and walk-in catchments to rail stations. Appendix B sets out the method used. The findings show *relative* levels accessibility for the different locations within the Borough. It must be noted that a detailed study is required to verify the indicative information which should include: consideration of the actual pedestrian network and walk-in times to town centres and PTAL ratings and/or a revised assessment of public transport accessibility including the impact of committed improvements to transport infrastructure.

3.30 Figures 3.7 shows that Redhill town centre is the most accessible area in the Borough and is indicatively classified as Area 1. Redhill is the Borough's major town centre and a regional transport hub⁹.

⁹ A detailed master planning process is being carried out including consideration of a micro-simulation model exploring traffic movements within the town centre

- 3.31 Reigate and Horley town centres are indicatively classified as Area 2, reflecting their status as larger town centres with extensive bus networks and suburban rail. Horley town centre has been classified as Area 2 because, although it is lower in the retail hierarchy than Reigate, significant expansion of the settlement and regeneration of the centre is planned.
- 3.32 It should be noted that the town centre boundary does not match exactly with the Parking Package Areas 1 and 2 for Redhill, Reigate and Horley. Based on the method set out in Appendix B, these would include the 5 minute walk-in catchment for the railway stations and exclude other areas. This would give town centre zones which were similar to, but not the same as, the Local Plan policy boundaries. However, for simplicity, the study has taken the town centre policy boundaries as the boundary of the Parking Package Areas.
- 3.33 The indicative 10 minute walk-in catchment to Redhill is also classified as Area 2, reflecting its peripheral role to the Borough's major town centre.
- 3.34 Banstead town centre and its approximate 10 minute walk-in catchment is indicatively classified as Area 3. This includes the town centre and the suburbs of Banstead and Nork. This classification reflects the nature of Banstead as the Borough's smallest town centre, and the moderate level of public transport provision. The residential areas within the approximate 10 minute walk-in catchments of Reigate and Horley and close to them are also indicatively classified as Area 3, due to their accessibility to the larger centres and moderate public transport accessibility.
- 3.35 The urban fringe areas of Redhill are also classified as Area 3, including the Holmethorpe area and much of Merstham to the north, Earlswood to the south and the western part of Redhill. This reflects their moderate public transport accessibility and distance to the town centre.
- 3.36 The remaining urban area is indicatively classified as Area 4. This includes the outer residential areas and isolated built up areas. These are: the urban area south of Nork including Tattenham Corner, Burgh Heath, Tadworth, Walton on the Hill and Kingswood; the urban areas south west of Banstead including Woodmansterne, Chipstead and Hooley; the eastern side of Merstham, the southern part of Reigate; the smaller settlements along the A23 corridor of Whitebushes and Salfords; and the north western fringe of Horley.
- 3.37 It is important to note that many of the areas classified as Area 4 have access to suburban rail and fall within the 30 minute public transport contour to a town centre. This is true of parts of Nork, Tattenham Corner, Chipstead and Salfords. It is possible that more detailed analysis would reveal that these and other areas would be more appropriately classified as Area 3. In addition, residential areas on the north

western side of the Borough are close to Epsom and further analysis of public transport provision may indicate that these should be classified as Area 3. However, in the first instance, given their outer or isolated location, these areas are classified as Area 4. As policy on density and parking develops, it may become appropriate to combine Areas 3 and 4 into a single classification.

4. NOISE

INTRODUCTION

4.1 Within the context of the size of the study area, noise is not generally a major constraint upon development. Various design techniques can usually be employed to satisfactorily develop noisier areas. The assessment of what is considered “satisfactory” is obviously influenced by the type of residential development (e.g. houses or flats) and hence the importance to be placed upon associated open spaces. This analysis therefore attempts to identify those areas within which noise issues should be considered. This does not mean that these areas can not be developed for mixed use and residential development, but rather that noise issues should be taken into account when designing schemes in these locations and appropriate mitigation included.

4.2 The potential noise constraints to residential development in the area include:

- Traffic noise;
- Aircraft noise;
- Train noise; and
- Industrial noise.

4.3 This strategic assessment places most emphasis on road traffic, as it is the most prevalent area-wide source of noise.

DEVELOPMENT CRITERIA

4.4 PPG24 ‘Planning and Noise’ defines Noise Exposure Categories (NECs), designed to characterise the acoustic suitability of areas for residential development. The NECs are defined in Table 4.1.

Table 4.1 - NEC Descriptions

NEC	Planning Advice
A	Noise need not be considered as a determining factor in granting planning permission, although the noise level at the high end of the category should not be regarded as a desirable level.
B	Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection against noise.
C	Planning permission should not normally be granted. Where it is considered that permission should be given, for example because there are no alternative quieter sites available, conditions should be imposed to ensure a commensurate level of protection against noise.
D	Planning permission should normally be refused.

- 4.5 PPG24 also suggests daytime and night-time free-field noise limits to define each of the NECs, depending upon the source of noise. These limits are given in Table 4.2.

Table 4.2 - NEC Defining Limits (dBL_{Aeq, 16h})

Noise Source	NEC							
	A		B		C		D	
	Day*	Night*	Day	Night	Day	Night	Day	Night
Road Traffic	<55	<45	55-63	45-57	63-72	57-66	>72	>66
Rail Traffic	<55	<45	55-66	45-59	66-74	59-66	>74	>66
Air Traffic	<57	<48	57-66	48-57	66-72	57-66	>72	>66

*"Day" is defined as 07:00-23:00 hours and "Night" as 23:00 -07:00 hours.

- 4.6 The conventional descriptor for road traffic noise used in the UK is the 18-hour (06:00-24:00) dBL_{A10} facade noise level. This unit approximates to a level 5 dB higher than the corresponding dBL_{Aeq, 16h} free-field level cited in PPG 24. For normal traffic distributions, night time noise levels are generally at least 10 dB lower than during the day, so that in terms of strategically identifying traffic noise constraints, separate consideration of the night time levels adds little to the assessment of suitability for noise-sensitive development.

DATA SOURCES AND METHOD

- 4.7 Traffic data for key roads within the Reigate and Banstead study area were downloaded from the Department of Transport site www.dft-matrix.net. The flows,

presented as classified AADF 2005 data were used to calculate traffic noise levels using the Department of Transport methodology contained in "Calculation of Road Traffic Noise" (CRTN). Simplifying assumptions were made such as flat ground between the road and receiver, no angle of view of the road restriction, no road gradient correction and no screening from either road cuttings or localised screening. Gatwick aircraft noise contours for 2005 were downloaded from the dft.gov.uk website (ERCD Report 0602, published 1 February 2007). No easily accessible source of train data was identified.

- 4.8 The traffic data is included in Appendix C, together with the assumed average vehicular speed at each count point and the calculated Basic Noise Level (BNL) at 10m from the road. The three right-handed columns of the table show the calculated distances to the façade levels from the edge of the carriageway of 60, 68 and 77 dBLA_{10,18h} corresponding to the dBLA_{eq,16h} defining limits of the NECs A, B and C shown in Table 4.2.

PREDICTED NOISE ISSUES

- 4.9 Figure 4.1 provides an indication of the broad locations where noise issues need to be considered. As set out above, this does not necessarily mean that these areas can not be developed for mixed use and suitable types of residential development. Noise issues should be taken into account when designing schemes in these locations and mitigation measures adopted, such as to ensure a degree of noise control appropriate to the proposed development.
- 4.10 As shown in Figure 4.1, road, rail and air traffic all generate noise of a level which affects development. The figure gives an indication of the broad locations which fall into NEC categories B, C and D, with most falling within category B. It is important to note that this analysis takes no account of topography, road or rail profiles, or the influence of secondary roads. It follows that the noise environment in any specific location will be dependent upon the site-specific details of that location. The methods of noise mitigation to be adopted, so as to ensure a noise environment, appropriately satisfactory for a specific use proposal, are therefore outside the scope of this study. Appendix B shows that the following areas are predicted to be affected by traffic noise; the accompanying comments are intended to highlight where particular noise control measures would need to be adopted – they do not advocate specific solutions or consider the relative merits of the various methods available. These are site-specific issues requiring site-specific solutions:
- M23: Development at more than about 285m from the motorway would be unlikely to need noise controls. At closer distances, varying degrees of control would be required, but development should normally be refused at less than about 20m;

- M25: The area where development should normally be refused alongside the M25 extends out to about 60-65m either side of the road. The area out to about 850m could be developed, provided suitable controls were employed. At distances of more than about 850m noise is unlikely to be a planning issue;
- A217: NEC “A” is in areas typically 200m or more from the more heavily trafficked sections of the A217 to the north of the M25. Over these lengths of road no development is likely to be acceptable within about 15m; between these two extremes development would need to incorporate varying degrees of noise mitigation. In the Reigate area no development should be permitted within about 10m of the road and varying amounts of noise control would be required for development out to about 135-155m. Traffic flows reduce to the south of Reigate, with noise not being a planning issue at distances of more than about 90m. Between about 90 and 25m from the road some noise mitigation is likely to be needed. Development should normally be refused at a distance of about 6m from the road;
- A2022: Noise need not be a planning issue at distances of about 115-130m from this road. Noise controls would be required at closer distances, with development not normally permitted within about 9 m of the road (NEC “D”);
- A240: Distance constraints are similar to those associated with the A2022;
- A25 (West Street, Reigate): Development should not normally be permitted within about 10m of this section of the A25, with noise insulation or other means of noise control required at distances out to about 40m (NEC “B” upper limit of 68 dBLA_{10,18h}). Beyond about 140m noise should not become an issue;
- A242: Development at more than 60m would not require noise to be considered. Noise would become progressively more significant at closer distances, with development not normally permitted closer than about 4m from the road;
- A2044: Development should not normally be permitted closer than about 6m to the road, with varying degrees of mitigation required out to a distance of between 75 and 110m. At distances greater than this noise would not be a planning issue;
- A23: In areas to the north of the M23 noise would not be an issue at distances of more than about 230m. Development should not be permitted within about 16m; between these extremes varying amounts of noise mitigation would be required. Noise between the M23 junction and north of

Redhill would need to be considered for developments within about 90-125m of the road, with no development normally permitted within 6-8m. The section of the A23 between Salford and Horley appears to carry large traffic flows, so that the NEC "A" boundary is about 170m from the road. Between about 170 and 50m (NEC "B") the need for noise mitigation would increase and between 50 and 12m (NEC "C") noise insulation and/or other means of controlling internal noise levels such as the internal layout of rooms, building orientation, site layout and perimeter screening etc. would be required. No development should be permitted within about 12m. The noise levels alongside the southern section of the A23 in Horley are similar to those to the north of Redhill, with noise not being an issue at more than 120m, and varying degrees of mitigation being required at closer distances, with no development normally permitted within about 8m of the road;

- 4.11 The published aircraft noise contours for Gatwick in 2005 show that the 57 and 66 $\text{dBL}_{\text{Aeq},16\text{h}}$ contours, corresponding to NEC "B", encompass a small part of the southern area of Horley. Aircraft noise is not therefore considered to be a significant constraint within the study area as a whole, but must be considered within this southern part of the study area. It is understood that night time noise contours have recently been produced. These would need to be considered in relation to any site-specific development applications in this area, having due regard to the limits recommended in Table 4.2 above.
- 4.12 No train noise data was easily available so that, for the purposes of this scoping study, a distance of about 100m, based upon professional judgement and experience, has been adopted as a typical distance beyond which noise issues are unlikely to arise. As with road traffic noise, the noise from railways is influenced by topography and factors such as noise screening, which is highly dependant upon the depth of cuttings and the height of embankments. These site-specific factors can only be addressed in relation to specific applications in specific areas.
- 4.13 No data is available regarding noise from industrial areas.
- 4.14 Figure 4.2 combines noise issues with the analysis of development potential based on townscape character set out in Section 2. Some of the town centre areas identified as having most development potential at Redhill, Reigate, Banstead and Horley are affected by noise issues, as is Merstham. Lower traffic flows on key routes means that Preston and the fringe development areas of Horley are not currently affected by the noise issues analysed.
- 4.15 Although detailed noise mapping could be used to cover the whole area, this would require large amounts of topographic and traffic data, and would be a costly exercise. Once specific areas have been identified as being potentially suitable for noise

sensitive development, noise mapping of each of these areas would provide a useful design tool with which to refine the noise assessments.

5. AIR QUALITY

INTRODUCTION

- 5.1 The role of air quality management in planning is not to sterilise development, rather it is to identify where areas of constraint exist or may be created as a result of development, and to develop measures to mitigate the air quality effects. This assessment therefore focuses on identifying the broad areas within which air quality issues need to be considered and appropriate mitigation included.
- 5.2 Air quality in the Borough is generally below statutory limit values, but a number of air quality management areas (AQMAS) have been declared. The most significant pollutant sources are the M25 and M23 motorways and Gatwick Airport, which lies immediately to the south of the Borough (in Crawley). Reigate town centre and a number of other smaller areas near the A23 and A217 have also been declared as AQMAS.
- 5.3 The pollutant of most concern is nitrogen dioxide (NO₂). Exceedences of the long-term (annual mean) UK and EU criteria for this pollutant present the most material air quality constraint to development in the Borough.
- 5.4 The principal source of the air quality constraints for the majority of the Borough is road traffic. The town of Horley in the southernmost part of the Borough is adversely affected by traffic attracted to Gatwick Airport, as well as emissions from the aircraft themselves and associated apron service vehicles. There have also been reports of a detectable odour of aviation fuel in Horley.
- 5.5 There are no major industrial sources of pollution in the Borough. Part A processes regulated by the Environment Agency include a landfill in Redhill and the Reigate and Horley sewage treatment works. There are a number of smaller Part B processes regulated by the Borough Council. The majority of these processes have been scoped out of review and assessment work undertaken by the Council.

EXISTING PLANNING CONSTRAINTS

- 5.6 The Borough has declared eight Air Quality Management Areas by Order. These represent a material consideration, if not constraint, for the development planning process. These have all been declared due to non-attainment of the NO₂ objective concentration.
- 5.7 Four of the AQMAs are declared for single properties. A further two are associated with the M25 and M23 motorways. Reigate High Street has also been declared, and the entire Horley Gardens estate has been declared due to the proximity of Gatwick Airport.
- 5.8 A number of further areas are currently under consideration for AQMA status as the body of empirical monitoring evidence grows. The most likely of these new AQMAs will be an extension of the existing Reigate High Street AQMA to include Bell Street (between Bancroft Road and the High Street), West Street (between Evesham Road and the High Street) and parts of London Road. Three further areas for consideration are Merstham High Street (a new AQMA is due to be declared alongside the A23 London Road); Banstead High Street and Redhill Town Centre.

FUTURE PLANNING CONSTRAINTS – ISSUES FOR CONSIDERATION

- 5.9 Air quality in the Borough is extremely well characterised through empirical monitoring and several rounds of detailed assessment work. However, local air quality management necessarily focuses on exposure to currently inhabited areas. New developments may well bring residential properties into areas which are constrained in air quality terms but have not been declared as AQMAs since there is no relevant exposure at present – AQMAs are only ever declared where there are people (receptors) currently present for appreciable exposure periods. The motorway corridors are an example of areas where receptors may be introduced to a constrained environment which is not necessarily an AQMA at present.
- 5.10 Related to this is the trend for new developments and redevelopments to tend towards a higher concentration of residential units; for example the land occupied by a few relatively large properties and their grounds may afford a sufficient physical footprint for several tens of apartments, each potentially inhabited by one or more vehicle owners. Under these circumstances, a key planning consideration must be to assess not just those receptors which are introduced to pollution, but the effect of the new inhabitants on the existing receptors.
- 5.11 As such, even the smallest AQMA may be exacerbated by new development as a result of the increased number of vehicle journeys associated with the development's use, be it residential or commercial.

SUMMARY OF LOCATIONS WHERE AIR QUALITY ISSUES SHOULD BE CONSIDERED

5.12 Figure 5.1 shows the locations where air quality issues should be considered based on current air quality conditions. The areas highlighted are a 30 metre buffer from main roads and the AQMAs. In summary, the areas for priority detailed assessment ahead of development should be as follows:

- Existing AQMAs. The declaration of AQMAs is not intended to sterilise development in these areas. Rather, there is considerable potential for the inclusion of planning conditions to improve local air quality such as vehicle and parking restrictions and other such measures which work in support of the air quality management plan in facilitating revocation of the AQMA Order;
- The M25 and M23 corridors. Current work undertaken by the Council suggests that a 30 metre corridor from the kerbside is an adequate buffer zone for development;
- Town Centre sites served by principal through routes, such as Reigate (much of the one way system has been declared), Redhill, Merstham and Banstead;
- Sites served by busy trunk roads such as the A23 and A217. By locating new property facades or fresh air intake points as far as practicable back from main roads a degree of mitigation may be achieved, but the effects of new development traffic on properties in areas which may be borderline AQMAs due to existing high traffic flows or proximity to roadside must also be considered;
- Sites served by busy roads with a significant gradient. Vehicles under increased load conditions travelling uphill emit more pollutants per unit distance; this issue is exacerbated under congested conditions;
- Sites in proximity to Gatwick Airport. The issue of the contribution of the airport to local air pollutant concentrations appears to be long-term and there is limited influence which the local authority can bring towards resolution; and
- Sites within a few hundred metres of waste or wastewater treatment sites. Odour is extremely difficult to quantify as a planning consideration and it may be prudent to assign a cordon sanitaire around such sites where detectable odour beyond the site boundary is likely.
- Sites likely to be equipped with a CHP plant, which will affect the overall NOx concentrations in the vicinity.

- 5.13 Figure 5.2 combines air quality issues with the analysis of development potential based on townscape character set out in Section 2. Air quality is potentially an issue for areas identified as having most development potential in town centre locations at Banstead, Reigate, Redhill and Horley. Conversely, the analysis indicates that air quality is not likely to be an issue for Preston, Merstham and the development areas on the northern edge of Horley.
- 5.14 In addition to the strategic analysis set out above, it should be noted that, as set out in paragraphs 5.10-11 above, increases in development density which generate additional traffic can lead to a reduction in air quality. The Council's air quality team may be able to provide data showing locations with higher concentrations of NO₂, which, while not currently failing to reach target standards, are relatively close to standards, and where further intensification of development could lead to a reduction in air quality.