



The Planning Inspectorate

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# **Report to Reigate & Banstead Borough Council**

**by Martin Pike BA MA MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Date: 31<sup>st</sup> January 2014**

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

## **REPORT ON THE EXAMINATION INTO REIGATE & BANSTEAD CORE STRATEGY LOCAL PLAN**

Document submitted for examination on 21 May 2012

Examination hearings held between 14 - 24 May and on 10 December 2013

File Ref: PINS/L3625/429/6

## Abbreviations Used in this Report

AA	Appropriate Assessment
AGLV	Area of Great Landscape Value
AONB	Area of Outstanding Natural Beauty
BLP	Reigate & Banstead Borough Local Plan 2005
BREEAM	Building Research Establishment Environmental Assessment Methodology
CSH	Code for Sustainable Homes
DCLG	Department for Communities and Local Government
DECC	Department of Energy & Climate Change
DMP	Reigate & Banstead Development Management Policies Local Plan
dpa	dwelling per annum
DPD	Development Plan Document
IDP	Infrastructure Delivery Plan
LDS	Local Development Scheme
MM	Main Modification
MP	Member of Parliament
NGP	New Growth Points
NPPF	National Planning Policy Framework ("the Framework")
ppa	persons per annum
PPTS	Planning Policy for Traveller Sites
RBBC	Reigate & Banstead Borough Council
RBCS	Reigate & Banstead Core Strategy Local Plan
RS	Regional Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SEP	South East Plan Regional Spatial Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SUE	Sustainable Urban Extension

## Non-Technical Summary

This report concludes that the Reigate & Banstead Core Strategy Local Plan provides an appropriate basis for the planning of the Borough over the next 15 years providing a number of modifications are made to the Plan. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plan.

The modifications can be summarised as follows:

- Include a model policy on the presumption in favour of sustainable development;
- Recognise that some loss of Green Belt land to housing development will be necessary, in certain sustainable locations, to meet as far as is practicable the needs of the borough;
- Include a new policy on the Green Belt to give strategic guidance to the detailed Green Belt review necessary at Development Management Policies Local Plan stage;
- Clarify the approach to protecting Areas of Great Landscape Value both before and after any review of the Area of Outstanding Natural Beauty;
- Identify two broad areas of search for sustainable urban extensions, and a third area for small scale extensions, that will contribute to meeting the housing need;
- Revise the policy on housing delivery to reflect the positive approach sought by national policy and to ensure land is released when necessary to maintain a five year land supply;
- Adjust the approach to employment development to ensure consistency with national policy;
- Revise the requirements for sustainable construction and decentralised/low carbon energy in light of current best practice and emerging changes to national standards;
- Amend the approach to gypsy and traveller provision in response to changes to national policy;
- Ensure that major development proposals are based on travel assessments and accompanied by travel plans, as sought by national policy;
- Include a new policy which provides an implementation and monitoring framework to assist in the timely delivery of the Plan's objectives.

## Introduction

1. This report contains my assessment of the Reigate & Banstead Core Strategy Local Plan (RBCS) in terms of section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the Proposed Submission Document which was published for consultation in March 2012.
3. During my initial assessment of the RBCS and the supporting documents I drew the Council's attention to certain key matters on which I considered there to be a real risk that the Plan might be found legally deficient and unsound.<sup>1</sup> Following an exploratory meeting in August 2012 to discuss these concerns, the examination was suspended for 7 months to enable the Council to carry out further work and to propose modifications to the Plan.
4. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act, the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
5. The main modifications that go to soundness have been subject to public consultation and, where necessary, Sustainability Appraisal (SA) and Appropriate Assessment (AA). I have taken the consultation responses into account in writing this report.
6. The Council has proposed a large number of additional modifications which do not materially affect the policies of the Plan. Under section 23(3) of the 2004 Act, which came into force in January 2012, these can be made by a local planning authority on adoption without the need to be examined. Because these additional modifications do not go to soundness and are solely a matter for the Council, I generally make no reference to them in this report. However, in some cases a main modification to a policy or text includes elements which, in themselves, are minor amendments which could be regarded as additional rather than main modifications.

## Assessment of Duty to Co-operate

7. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A of the 2004 Act. The

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<sup>1</sup> See Inspector's Key Concerns, June 2012 (ID/1)

duty requires local planning authorities to co-operate with other Councils and bodies to address strategic cross-boundary issues when preparing Local Plans.

8. The section 33A duty came into force towards the end of the RBCS preparation process and initially it was not clear whether adequate meaningful cross-boundary working had taken place to satisfy the new legal requirement. The Council produced a supplementary statement<sup>2</sup> in response to my concern which, for the most part, demonstrated that the Council had worked with neighbouring authorities and other bodies to co-ordinate delivery across a range of strategic priorities. Most RBCS preparation took place against the backdrop of participation in sub-regional bodies which developed strategies tested at the South East Plan (SEP) examination; this provided a robust framework during the evolution of the Core Strategy. Sub-regional working has continued through participation in the Gatwick Diamond Initiative (now part of the Coast to Capital Local Enterprise Partnership), and through issue-based bodies dealing with matters such as flood alleviation and transport.
9. Following SEP revocation, some representors queried whether adequate mechanisms are in place outside the Gatwick sub-area for cross-boundary co-operation on strategic matters. In particular, questions arose over the approach to the delivery of housing across a market area which includes parts of outer London and its rural fringe. I deal with concerns about the quantum of proposed housing under issue 3. In terms of cross-boundary co-operation, an initial objection to the RBCS from Crawley Borough Council was resolved when evidence showed that part of Crawley's unmet housing need would be met within Reigate & Banstead borough.<sup>3</sup> Regular discussions have taken place with other neighbouring Councils and have not led to Reigate & Banstead being asked to take part of any authority's unmet need. And when asked prior to the examination hearings whether they would be able to take any of the unmet housing need arising in Reigate & Banstead, these neighbouring Councils declined because all are facing similar strong development pressures and have difficulty in meeting their own needs.
10. Overall, with regard to the preparation<sup>4</sup> of the RBCS (which largely took place under the previous arrangements), there is no compelling evidence that the section 33A duty to co-operate has not been met.

## Assessment of Soundness

### PREAMBLE

11. In part, the length and complexity of this examination has resulted from the necessity to keep in step with the Coalition Government's reforms of the planning system. This has resulted in significant national policy changes, including publication of the National Planning Policy Framework ("the Framework") in March 2012 shortly after consultation on the Submission RBCS had commenced. The views of all examination participants were sought on the evolving policy changes insofar as they affected the assessment of

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<sup>2</sup> RBBC/3

<sup>3</sup> Statement of Common Ground with Crawley BC, RBBC/10

<sup>4</sup> The legal duty to co-operate applies to the plan preparation stage (section 19 of the 2004 Act); the effective date for assessment of compliance is submission of the RBCS for examination, ie 21 May 2012.

soundness of the RBCS and its policies. The report takes all these matters into account.

12. The RBCS was submitted at a time when the July 2010 decision of the Secretary of State for Communities and Local Government to revoke Regional Strategies (RSs) had been overturned in the High Court.<sup>5</sup> Consequently the SEP remained a part of the development plan during the early part of the examination. Formal revocation of the SEP took place on 25 March 2013 and all representors were consulted on the implications for the RBCS. The Council concluded that the SEP evidence base remained robust and relevant, particularly since the SEP had been subject to a process of consultation and examination. It identified a small number of changes to the RBCS to reflect SEP revocation.<sup>6</sup> These comprise minor amendments and the Council's view that they represent "additional modifications" is correct.

## **MAIN ISSUES**

13. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified eight main issues upon which the soundness of the Plan depends.

### **ISSUE 1 – WHETHER THE OVERALL SPATIAL STRATEGY IS SOUND HAVING REGARD TO THE CONTEXT AND NEEDS OF THE DISTRICT**

14. The first part of the Plan describes the characteristics of the borough and the problems and issues it faces. It is derived from an extensive evidence base of studies on socio-economic and environmental matters and the results of community engagement throughout the plan-making process. The Plan identifies a vision for the borough and number of strategic objectives which, together, aim to secure a sustainable approach to growth.
15. Reigate & Banstead borough lies on the southern edge of the Greater London conurbation and almost all land outside the existing urban areas is part of the Metropolitan Green Belt. Compared with nearby authorities, the borough's Green Belt is relatively narrow. Significant tracts of undeveloped land are subject to a range of environmental constraints including the Mole Gap to Reigate Escarpment Special Area of Conservation, the Surrey Hills Area of Outstanding Natural Beauty (AONB) and areas at high risk of flooding. Against this background the RBCS strategy is to prioritise regeneration and to make full use of development opportunities within the urban area.
16. The Submission version of the Plan was somewhat ambivalent about the need for land outside the urban area to be developed, particularly Green Belt land. Because information about potential capacity within the urban area to meet the housing and employment needs identified by the Council was not wholly convincing, it became evident that development of some land outside the urban area would be unavoidable. During suspension of the examination the Council refined its approach, acknowledging in a more positive and evidence-based manner the need for Green Belt releases and devising a robust

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<sup>5</sup> Cala Homes (South) Ltd, R (on the application of) v Secretary of State for Communities and Local Government & Anor [2011] EWCA Civ 639.

<sup>6</sup> Letter from RBBC dated 4 April 2013 (RBBC/11).

sequential strategy to manage this process. **MM2** addresses the principle of this change in strategy and is required to ensure compliance with the Framework.

17. In terms of allocating land for development, the modified text and policy CS4 (**MM9** and **MM10**) give highest priority to specific urban growth locations and regeneration areas, followed by the built-up areas of the four main settlements and then other sustainable sites within the urban area. Only when these opportunities fail to provide an adequate land supply will sites adjoining the urban area be released, again in sequence: firstly small-scale extensions on non-Green Belt land adjoining Horley, followed by two larger sustainable urban extensions (SUEs). Studies undertaken during plan preparation (and subsequently) examined alternative options for filling the gap between the urban land supply and the housing target, concluding that SUEs were the most sustainable solution.
18. This sequential approach to development is sound in principle and consistent with the Framework. The main points of contention relate to the size of the need for housing development, the capacity of the urban areas to accommodate this need, the capacity of greenfield land outside the Green Belt to meet the unmet housing need, the extent to which Green Belt land should be used to meet the unmet need, and the location of that land. These matters are considered in more detail in the remainder of this report.

## **ISSUE 2 – WHETHER THE PROPOSED SCALE AND LOCATION OF HOUSING IS SOUND HAVING REGARD TO LOCAL NEEDS AND CONSTRAINTS AND THE REQUIREMENTS OF NATIONAL POLICY**

### *Objectively assessed housing need*

19. The starting point for the consideration of housing provision is what comprises the full, objectively assessed need for market and affordable housing. The Framework advises that an understanding of housing needs should come from a Strategic Housing Market Assessment (SHMA) prepared for the relevant housing market areas; the SHMA should identify a scale of housing need which meets household and population projections (taking account of migration and demographic change), address the need for all types of housing, and cater for housing demand and the scale of supply necessary to meet this demand. The East Surrey SHMA, which covers a wide area including most of the borough, was prepared in 2008 and partially updated in 2009.<sup>7</sup> A further SHMA update in 2012<sup>8</sup> covered Reigate & Banstead borough only and focused on the affordable housing sector.
20. The 2008 SHMA forecasts growth of 10,000 households across the borough in the 2006-2026 period, based on 2004 DCLG projections. This was the figure used in the SEP to give an annual average requirement of 500 dwellings. Based on household survey information, the SHMA estimates the demand for market housing at 278 dwellings per annum (dpa) and the need for affordable housing is calculated to be 523 dpa (assuming backlog is eliminated over 5 years). The 2012 SHMA update uses 2008-based projections to forecast a substantially higher growth of 17,000 households between 2008 and 2028, or

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<sup>7</sup> EP8 and EP10

<sup>8</sup> EP1a

850 dpa. Based on a more realistic assumption of reducing the affordable housing backlog over the plan period, the 2012 update calculates the affordable housing need to be 366 dpa.

21. The 2011 Census provides the most accurate demographic data for the borough and a more up-to-date benchmark for projections than those available for the SHMA and its updates. Interim projections are available for the 2011-2021 period only; these indicate household growth of 933 per annum over 10 years. Extrapolating these projections forward over 15 years, and making allowance for a slower rate of household growth in the last 5 years of the plan period, the 2011-based projections suggest slightly higher growth than the 2008-based projections.<sup>9</sup>
22. Population and household projections are trend-based – they indicate the growth that would occur if recent trends (generally over the past five years) continue over the period of the projection. Consequently they take no account of policy interventions or other individual factors which affect growth rates in particular areas at particular times. This has profound significance for Reigate & Banstead because of its participation in the government's New Growth Points (NGP) initiative. This required the Council to "front-load" its delivery of the level of housing proposed in the SEP and led to a high number of dwelling completions in the years 2006-2010. Not surprisingly, this led to a significant increase in migration into the borough over the same period: the evidence demonstrates a markedly higher increase in both overall population and in-migration over this period compared with Surrey authorities and the wider South East.<sup>10</sup>
23. Although the effects of the recession have dampened housing delivery in the last couple of years, any slow-down in growth has not yet been fully reflected in the demographic projections. Consequently the latest population and household projections assume that the high growth trend of the previous five years will continue into the future. For example, the 2011-based projections show a population growth of about 16% in the period 2010 to 2021 for Reigate & Banstead, compared with a growth by 2028 of under 13% for the South East and under 15% for Surrey.<sup>11</sup> Clearly the recent projections do not take into account that, under the NGP initiative, growth in Reigate & Banstead was expected to tail off in the latter part of the plan period.<sup>12</sup> Their value as reliable indicators of future growth is therefore limited.
24. Nevertheless there is merit in examining the individual components of the latest projections. In particular, because it reflects the 2011 Census data on population structure, the natural change component (balance of births over deaths) of the 2011-based projections is likely to be reasonably robust. Extrapolating the 10 year projection over the 15 year plan period, the Council estimates population growth of 9,900 being attributable to natural change; this equates to household growth of 332 or 367 per annum depending on the rate of decline in household size.<sup>13</sup> This represents the level of housing

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<sup>9</sup> RBBC/16, Matter 3.1. Results derived from simple extrapolation of interim 10 year forecasts must be treated with caution; however no other projections based on 2011 data are available.

<sup>10</sup> See "Housing Need and Demand" paper (EP54), especially figures 7-10

<sup>11</sup> EP54 figure 13

<sup>12</sup> EP54 figure 12

<sup>13</sup> RBBC/25



- provision required to meet the needs of the current resident population, excluding the impact of future migrants.
25. Over the past decade migration has been the major component of population growth and the projections merely continue that trend. But as indicated above, it is highly unlikely that the growth profile resulting from the NGP initiative will be repeated. The Council argues that the internal net migration assumed in the 2008-based projections, which averages an increase of 550 persons per annum (ppa), better represents the likely future scenario than the figures of over 1,100 ppa assumed in the 2010- and 2011-based projections. Because the 2008-based projection reflects a period of low growth followed by high growth and is more indicative of longer term trends, this reasoning has considerable merit despite the 2008 figures being somewhat dated.
  26. Turning to international/cross border migration, there is also validity to the Council's point that recent figures are likely to be more accurate because they are based on administrative data sources rather than modelling. Given the variance between the 2010- and 2011-based figures it is appropriate to take an average of the two. This gives an increase of 120 ppa, though given the limited data on which it is based, this is the least reliable of all the components of change.
  27. To summarise, the objectively assessed population growth of the borough is an increase of about 19,950 persons over the plan period (2012 to 2027): 9,900 as a result of natural change, 8,250 (550 x 15) from internal migration and 1,800 (120 x 15) from international migration. This level of population growth is very similar to scenario 2b of the Council's "Housing need and demand" paper,<sup>14</sup> which results in household growth of between 603 and 640 households per annum depending on the rate of decline of household size.
  28. The 2011 Census revealed that, contrary to predictions, average household sizes in the borough (and in Surrey) increased over the preceding decade, most of which was a time of relative prosperity and economic growth. It is therefore difficult to predict how quickly the longer term trend of reducing household sizes will resume. The Council makes two alternative assumptions: a reduction from 2.42 to either 2.38 or 2.36 by 2027. Given the increase in household size over the past decade, the length of the current recession and the borough's desirable location on the rural fringe of London, which is likely to keep house prices high and thereby constrain some new household formation, it might be argued that a decline in household size to 2.36 is unlikely. But in the absence of any firm evidence on this matter, the best option is to treat these alternatives as a range of housing need.
  29. The evidence leads to the conclusion that the full, objectively assessed need for housing over the plan period is an annual average of between about 600 and 640 dwellings, giving a total of 9,000-9,600 dwellings over the plan period. This broadly aligns with the total demand for market and affordable housing taken from the SHMAs (644 dpa) which, despite being somewhat dated, represents a useful sensitivity test. Approximately 330-370 dwellings would be required each year to accommodate natural change, the remainder being needed to cater for net in-migration.

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<sup>14</sup> Document EP54 Table A2.8

30. It must be appreciated that this conclusion is based on limited up-to-date evidence and interim projections that only go to 2021. When longer term 2011 Census-based projections become available the Council should consider, in conjunction with neighbouring authorities, whether new assessments of the scale of need are required for the relevant housing market areas.

*Proposed scale of housing provision*

31. The RBCS adopts the SEP target of 10,000 houses over the period 2006-2026. Because the NGP initiative led to a high level of dwelling completions in the early years, the residual requirement (rolled forward by one year) is 6,900 dwellings between 2012 and 2027, an annual average of 460. This would meet the full numeric need arising from the existing population and allow some continued migration into the borough from other parts of the housing market (and wider) area. However, the analysis above indicates that it would only cater for part (approximately 40%) of the level of in-migration included in the objectively assessed housing need.
32. The Council argues that an annual average of 460 dwellings is the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough.<sup>15</sup> As a consequence it submits that a higher provision which fully met the objectively assessed need would not accord with the Framework. These matters are considered below.

*Capacity of urban areas and windfalls*

33. The strategy of prioritising urban intensification places considerable reliance on the ability of urban areas to accommodate the bulk of the housing growth anticipated by the Council. Although most of the urban sites identified in the 2012 SHLAA<sup>16</sup> withstood rigorous testing during the May 2013 hearings, there were some instances of sites identified in the first five year tranche either falling away or being put back to years 6-10. The assumption that all the urban SHLAA sites will yield the anticipated 4,610 dwellings, with no allowance for non-implementation or slippage, is therefore questionable. Whilst it is reasonable to assume that the majority of SHLAA sites will be developed as planned, the evidence suggests that some will not.
34. This was borne out in August 2013 when a colleague Inspector dealing with a planning appeal<sup>17</sup> concluded that the Council did not have a five year supply of deliverable sites, as required by paragraph 47 of the Framework. The main reason was the continuing delay in delivery of the large site at Horley North West Sector which is allocated for housing in the 2005 Borough Local Plan (BLP). At the final hearing session in December 2013 there was evidence of significant progress being made since August in bringing this site forward, with all landowners and four national house-builders now committed, conditional contracts about to be signed and agreement reached on all significant matters. Whilst some doubt remains on this complex site until all the legal agreements have been completed and the planning permission issued, there is a

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<sup>15</sup> Though the inclusion of "at least" against the housing figures for the urban areas recognises that further urban opportunities could arise.

<sup>16</sup> EP6n-q

<sup>17</sup> APP/L3625/A/13/2193350 - RBBC/35

reasonable prospect that it will deliver at least the estimated 400 dwellings during the next five years and be built out within the plan period.

35. As for the other housing sites which were queried by the appeal Inspector, the Council accepts that on a cautionary basis Marketfield Way, Redhill and Kingswood Station should be excluded from the five year supply. New evidence available since August supports the view that Merland Rise, Preston and Redhill Station will deliver the anticipated number of completions within five years. A summary of the latest land supply position is given in the authority's interim statement.<sup>18</sup> This demonstrates the existence of a five year supply of deliverable housing sites (plus 5% buffer, as sought by the Framework), though the position is marginal and the Council should monitor the situation closely.
36. Historically, windfall sites have provided a substantial source of housing supply. Despite the better identification of urban potential in recent SHLAAs, other opportunities will continue to emerge throughout the plan period. In addition, the capacity threshold of 10 dwellings used in the SHLAA means that the yield from small sites is excluded from the assessment; in recent years this has comprised about 15% of total supply, equivalent to 100 dpa. About half of total windfall supply comes from residential intensification: to accord with advice in the Framework, which states that a windfall allowance should not include residential gardens, the Council predicts a future yield of 50 dpa from windfall sites. In practice, when the potential from residential garden land is taken into account, this number is likely to be significantly exceeded.
37. The yield from windfalls in the first year or two of the plan period will come mostly from sites with planning permission (which are part of the identified supply) rather than from as yet unidentified windfall sites. Consequently, at the start of the assessment period it is doubtful whether the full annual allowance of 50 additional windfall dwellings will be delivered. But given the conservative nature of the windfall yield it is likely that provision will soon overtake the anticipated supply. Furthermore, recent information suggests a significant addition to the first five years' windfall supply as a result of changes from office to residential use following a temporary extension to the permitted development regime.
38. In recognition of the greater potential delivery from within urban areas, the Council has included in its housing provision an additional 435 dwellings in the form of "broad locations". These would be delivered mainly from town centre sites that are to be allocated in the Development Management Policies (DMP) plan. The total estimated urban capacity is therefore 5,795 dwellings – 4,610 from SHLAA sites and commitments, 750 from windfalls and 435 from urban broad locations.<sup>19</sup> Although delivery of this number is potentially feasible, in my view it is also optimistic because it depends on a higher than projected yield from windfalls/broad locations to compensate for the likelihood that not all the SHLAA sites will be developed in full.

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<sup>18</sup> Table 4 of Five Year Land Supply: Interim Statement, September 2013 – RBBC/33. This was updated in December 2013 to include the increased capacity at Merland Rise (+60) and deletion of completions since April 2013 (-87).

<sup>19</sup> In Box 4 this total is broken down into delivery across the Plan's three Areas (930 +1,610 +2,440) plus 815 from 'windfalls and other urban broad locations'. It is rounded to 5,800 in paragraph 7.4.5.

39. Some objectors contend that there is sufficient capacity within the urban areas to meet almost all the proposed housing provision. The 2012 SHLAA is a detailed and thorough appraisal of housing land capacity over the plan period and all potential sources of supply were examined. There is no compelling evidence that an increase in the already high density assumptions is realistic, or that markedly higher than anticipated yields will come from other sources such as urban open land, flats over shops and so on. And as indicated above, it is more likely that the SHLAA overestimates rather than underestimates urban capacity, with higher than predicted windfalls making up any shortfall in the identified supply. Thus the claim of greater urban capacity is not supported by the evidence.
40. The distribution of windfalls across the borough is uncertain because it is not possible to predict where they will arise. All three of the borough's geographic areas are expected to contribute. Within the North Downs Area the Submission RBCS refers to limited development opportunities in Banstead and even lower potential in the other settlements, where fewer services and lower transport accessibility are stated to exist. This is not wholly consistent with evidence which indicates a distinction between the north-west of the Area and settlements further south. Transport accessibility (by all modes) and the potential for residential intensification, in particular, are appreciably better in the north-west of the Area, whereas the settlements in the south are more remote from large settlements and have greater constraints. Whilst it does not represent a change in the policy or approach to windfalls in this Area, **MM11** is justified because it more accurately reflects the existing situation.

#### *Greenfield land outside Green Belt*

41. With the urban land supply unlikely to provide more than 5,800 dwellings at best, land will have to come from outside the urban areas if the Council's minimum target of 6,900 dwellings is to be met. Next in sequence is the narrow band of countryside surrounding Horley that is outside the Green Belt, which is identified in the modified Plan for small scale urban extensions of up to 200 dwellings. At the examination there was considerable developer interest in a number of sites, demonstrating the possible delivery of a larger scale of development around Horley. However there are a number of factors which militate against a higher yield from this broad location at present.
42. The first is that significant areas of the rural surrounds to Horley are in flood zones 2 and 3 and therefore at risk of flooding. The RBCS aims to direct development to locations where flood risk is minimised through application of the Sequential and Exception Tests, which is wholly consistent with national policy. Whether the Strategic Flood Risk Assessment map for south-east Horley<sup>20</sup> over-estimates the extent of these designations, as one representor contends, is unclear – without Environment Agency agreement to the modelled flood zones produced by the representor, the evidence is not compelling.
43. The notion that non-Green Belt land in flood zone 2 should always be prioritised over Green Belt land in flood zone 1 is not part of national policy. As the Council has demonstrated, the relative merits of Green Belt protection and flood risk minimisation need to be considered at individual settlement/site level having regard to sustainability and other factors. Thus at Horley, the

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<sup>20</sup> EP52

presence of sizeable tracts of potentially developable land in flood zone 2 remains a constraint on the allocation of urban extensions of a larger scale than proposed by the Council. In addition, parts of the land to the south and east of Horley outside flood zones 2 and 3 are subject to noise from nearby Gatwick airport, while the southernmost area is part of a strategic gap separating Horley and Gatwick.

44. Another important consideration is the desirability and capacity of Horley to absorb more housing at the present time. Almost 30% of the 6,900 dwellings proposed in the RBCS are planned for two major sites at Horley, the North East and North West sectors. Development of these long-standing BLP allocations has been relatively slow and delivery is expected throughout the plan period. Both schemes will contribute to the infrastructure and services necessary to support Horley's expansion; the introduction of another major competing scheme could detract from what are clearly the most sustainable options for growth in this relatively small town. Moreover, historic completion rates for Horley suggest a challenging market ahead if the numbers anticipated from these two large sites (plus the proposed small scale urban extensions) are to be realised, so it is questionable whether a third major land release would be deliverable by 2027.
45. Taking all these factors into account, the Council's decision to limit additional urban extensions at Horley to 200 dwellings (**MM9**, **MM17** and **MM18**) is sound. The location and definition of sites for these extensions is properly the function of the DMP stage rather than the Core Strategy. As to whether the words "up to" 200 dwellings should be replaced by "approximately", the use of "up to" is consistent with the approach taken with other SUEs. In any event, the difference in dwelling yield between these words is unlikely to be significant, so there is no strong reason to modify the Plan.

#### *Development in Green Belt*

46. Given the limited capacity of suitable and deliverable greenfield land outside the Green Belt, the only option available within the borough to meet the bulk of the housing shortfall is land currently in the Green Belt. At a strategic level this matter was previously examined during preparation of the SEP, which indicated that a small scale local review of the Green Belt was likely to be required around Redhill-Reigate to support its role as a regional hub. Although the Council was aware of imminent SEP revocation at the time the RBCS was submitted, it reviewed the evidence and concluded that the SEP housing target remained appropriate. Despite the public outcry when the loss of Green Belt was identified more prominently during the suspension (see below), the Council did not resile from this position when revocation finally occurred.
47. With the SEP gone, the Framework is the predominant source of planning policy. Paragraph 79 stresses the great importance attached by Government to Green Belts as a means of preventing urban sprawl by keeping land permanently open. The overarching presumption in favour of sustainable development at paragraph 14 requires local plans to meet objectively assessed needs *unless* Green Belt and certain other policies (including flood risk) indicate that development should be restricted. On this basis many objectors submit that the Framework should be read as opposing *any* loss of Green Belt land for housing.

48. However, paragraph 83 of the Framework does allow for Green Belt boundaries to be altered "in exceptional circumstances" as part of the preparation or review of a local plan. The focus is on promoting sustainable patterns of development: paragraph 84 requires consideration of the consequences of channelling development towards non-Green Belt locations, while paragraph 85 seeks (amongst other matters) consistency with the strategy for meeting identified requirements for sustainable development. The Framework also allows land to be excluded from the Green Belt which is unnecessary to be kept permanently open.
49. The Government has made abundantly clear, both in the Framework and in Ministerial statements, the urgent need to boost significantly the supply of housing and, as far as is consistent with other policies, to meet fully the needs of the relevant housing market area. Set against this is the great importance attached to preserving a relatively narrow part of the Metropolitan Green Belt which serves not only the borough's residents but also those of the wider London conurbation. When dealing with individual planning applications, Ministers have frequently determined that housing need does not, on its own, trump Green Belt policy. But the process of plan-making requires a more strategic and longer term assessment to be made, as paragraphs 83-85 of the Framework demonstrate.
50. During the examination there was much debate about the interpretation of national policy in the context of Reigate & Banstead's particular needs and constraints. When devising a sustainable local approach to the Green Belt in policy CS1b, it was felt that the exceptional circumstances justifying Green Belt release through the plan-making process would only exist if there is an overriding need for the development to achieve the strategic objectives and policies of the Core Strategy, and either (i) all possible options for development outside the Green Belt have been exhausted, or (ii) the development would represent a significantly more sustainable option than development on non-Green Belt land. In addition, there should be either no conflict with the purposes and integrity of the Green Belt or, at worst, limited conflict. Because sustainable development lies at the heart of the Core Strategy, its promotion is implicit in the need to achieve the Plan's strategic objectives.
51. At the time of RBCS submission, there was little clarity about the likely scale of development in the Green Belt and limited evidence of whether there was capacity to accommodate it sustainably in compliance with the Framework. The work on SUEs subsequently carried out by the Council<sup>21</sup> effectively combines a detailed sustainability appraisal of all realistic options with a high level Green Belt review. Areas of search adjoining the settlements were tested by applying five principles which are central to the Core Strategy; this revealed that sustainable opportunities which do not undermine the aim and purposes of the Green Belt are very limited. Nevertheless, the SUE studies demonstrate that the most appropriate strategy comprises medium-size urban extensions (of 500-700 dwellings) into areas of Green Belt which make a relatively less important contribution to fulfilling Green Belt purposes.
52. The technical work on SUEs uses the locally derived East Surrey Sustainability Objectives and is consistent with earlier evidence-based studies which inform

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<sup>21</sup> EP56 (parts 1 and 2) and EP57

the Core Strategy. Apart from calls for a more site-specific Green Belt review, which is proposed at DMP stage of plan preparation and is therefore outside the scope of this work, there was no detailed challenge at examination to the methodology adopted. And while there was strong local objection to the identification of the SUEs selected, there was no compelling evidence that the studies are inherently flawed or inadequate. Consequently the technical work on SUEs is thorough and robust.

53. The prioritisation exercise which is central to the SUE work examined a large number of potential opportunities for strategic-scale growth within the Green Belt. Most Green Belt in the northern half of the borough is part of a broad swathe of open land that separates the southern fringe of Greater London from settlements to the south and has a vital strategic role and function as a 'green lung' for the conurbation. Though the Green Belt in the rest of the borough generally performs a more local function, it is fragmented in parts and the total area is not huge, especially when compared to other similar authorities nearby. The study concluded that only two medium size (up to 700 dwelling) extensions satisfy the sustainability and Green Belt criteria and fit with the spatial strategy: East of Redhill/Merstham and South/South-West of Reigate. All other potential opportunities fail one or more of the tests. Thus at a strategic level, only sites from these two broad locations comply fully with the criteria in the Framework and exhibit the exceptional circumstances necessary if Green Belt boundaries are to be altered.
54. The technical study gives highest priority to the SUE East of Redhill/Merstham, finding this broad location to have the best fit with the overall spatial strategy, to be the most accessible and to make a lesser contribution to Green Belt functions than the location South/South-West of Reigate. It is also apparent that this broad location includes areas of constraint including nature conservation interests, proximity to landfill operations, and ancient woodland on (as I observed on my visits) the high quality landscape of the greensand ridge. Whilst provision of the maximum anticipated number of dwellings may be challenging, there is no fundamental reason to doubt that this is a suitable broad location for development.
55. The SUE South/South-West of Reigate also contains areas of constraint, including part of an AGLV and a localised area subject to flooding. However there are sizeable areas of this mainly flat broad location which are free of constraints and available for development. The poorer accessibility and transport linkages are the main reason for its lower priority than East of Redhill/Merstham, though some transport improvements should be achievable. The openness of the landscape means that housing development would be conspicuous from many parts of the existing urban edge, a factor which has contributed to substantial local objection. But provided a high quality design is achieved that respects and integrates with the existing built form, which is a detailed matter for subsequent plans and guidance, this SUE is appropriate.
56. Because the Core Strategy aims to identify broad locations for SUEs rather than specific sites, a clear and robust policy is required against which the individual sites with potential for Green Belt release can be tested at DMP stage. As stated above, this policy (CS1b) emerged and was refined during the examination. It includes the broad principles already discussed and the criteria that will be applied when undertaking the detailed Green Belt review. I consider it represents an appropriate local approach that is consistent with

national Green Belt policy. To avoid confusion about whether small scale urban extension sites might be released across all parts of the Green Belt, the Council clarified that, consistent with its strategy, Green Belt sites would only be released for development from within the areas of search for SUEs. **MM5** and **MM6** set out the new text and policy and are necessary to ensure the soundness of the Plan.

### *Safeguarded Green Belt land*

57. When defining Green Belt boundaries, the Framework requires authorities to consider identifying safeguarded land between the urban area and the Green Belt to meet longer-term development needs beyond the plan period. In the SUE studies a sizeable area of search 'East of Salfords' is identified as a potential longer-term growth opportunity, though the Council considers that further work is necessary before this area could be demarcated as safeguarded land. Instead, the desirability of identifying safeguarded land is included in general terms in both the Green Belt policy and accompanying text, with the decision on a specific site or sites devolved to the DMP.
58. The SUE technical studies revealed that development at East of Salfords would have limited impact on the purposes of the Green Belt and cause no greater harm (and perhaps less harm)<sup>22</sup> to the Green Belt than the two chosen SUEs. In sustainability terms there are certain limitations that could be overcome by a large development which would be capable of providing the necessary services and infrastructure. However, because a large scale of development would be necessary, and because East of Salfords does not adjoin a main urban area, its identification at present would not be consistent with the overall spatial strategy of medium-size extensions to established urban areas. In addition, its location just north of Horley means that delivery of the priority sites on the edge of that town might be compromised if East of Salfords was introduced during the plan period. Accordingly, whilst this area appears to have potential for development, it is right that further work is required to determine whether or not it should be identified as safeguarded land.

### *Public opposition to Green Belt development*

59. I have taken into account the high level of public opposition to any loss of Green Belt, with many objectors believing it to be inviolable. Petitions with over 1,250 signatures opposing the loss of Green Belt land were submitted to the Council during the period of suspension and Crispin Blunt, the MP for Reigate, secured an adjournment debate in Parliament on this matter in January 2013. The Prime Minister was subsequently involved, responding to a letter from Mr Blunt in March 2013<sup>23</sup> and answering a Parliamentary Question from the MP in June 2013.
60. These concerns are legitimate and understandable, for the inevitable harm caused by the loss of sizeable tracts of protected countryside and the effects on neighbouring communities are significant adverse impacts of the proposed SUEs and should not be dismissed lightly. But as Government advice in *The*

<sup>22</sup> See Annex 3 of EP57. East of Salfords (Area of Search L) is identified as having less impact on an open gap than East of Redhill (Area J). Compared with South of Reigate/Woodhatch (Area G), East of Salfords has "low or no" sensitivity on open gaps compared with "generally lower" sensitivity, and stronger boundaries on all sides.

<sup>23</sup> REP/110/001-002



*Planning System: General Principles* makes clear, local opposition is not in itself sufficient reason to reject a proposal; decisions should be taken in the light of all material considerations, including local priorities and needs, guided by relevant national policy. In this case the planning merits of the selected SUEs have been thoroughly explored at this examination and found, in principle, to outweigh the loss of Green Belt and the impacts on the local area and its communities.

61. I am also conscious of the argument that the Council felt pressured into accepting some loss of Green Belt by me and the previous examination Inspector (whose findings led to the Council withdrawing the first version of the RBCS in 2010). This was the focus of the parliamentary debate and was debated again at the hearings. But as I indicated throughout this examination, my task is to apply national policy set out in the Framework, having regard to the quality and robustness of the evidence. For its part, the Council rightly places considerable weight on having an up-to-date adopted local plan so as to avoid the uncertain and potentially sub-optimal delivery of housing land through planning applications and on appeal.
62. Paragraph 154 of the Framework requires local plans to "set out the opportunities for development and clear policies on what will or will not be permitted and where"; there is also great emphasis on policies which are evidence-based, effective and deliverable. The phraseology of the Submission RBCS (a robust and defensible Green Belt *will* be maintained...; ...SUEs *may* be required..... which *could* result in release of Green Belt land...) was neither clear nor reflective of the evidence, hence the initial concern expressed by me. Through its subsequent work on housing need, land supply and SUEs, the Council established a clear need and framework for Green Belt releases and identified two medium-size urban extensions which satisfy the sustainability and Green Belt objectives of national policy. Thus while I required further work to resolve the ambivalence in the Plan, it is the Council's own objective evidence which identifies Green Belt releases to meet part, but not all, of the assessed housing need. It is this evidence, and the modifications to the RBCS which flow from it (**MM13, MM14, MM15** and **MM16**) that I have found compliant with national policy and sound.

#### *Balance of housing need and capacity*

63. As demonstrated above, there is potential for up to 7,400 dwellings to be delivered over the plan period (5,800 from the urban areas, up to 200 from around Horley and up to 1,400 from two Green Belt SUEs). These modified figures (set out in **MM3, MM9** and **MM10**) show that that the Plan is 'justified' and 'positively prepared', as required by national policy. Achieving this quantum depends upon the Council's assumptions for urban capacity sites proving to be correct and each SUE yielding the maximum 700 dwellings. Whilst it is not certain that all 7,400 dwellings can be delivered, it provides a 500 dwelling margin above the Plan's minimum target of 6,900 dwellings. This margin builds resilience into the housing delivery proposals of the RBCS and gives confidence that at least the minimum 6,900 dwellings will be achieved.

64. Some representors argue that because the strategic sustainability testing<sup>24</sup> found no appreciable difference between delivery of 6,900 dwellings (460 dpa) and 7,500 dwellings (500 dpa), the higher figure should be the target in the Plan. But although the potential for 7,400 dwellings (close to the higher figure) is recognised in the Plan, delivery of this number is not assured. Conversely, because delivery of 6,900 dwellings is robust, this remains the most appropriate target. The important point is that 6,900 dwellings is consistently referenced as a minimum target ("at least..."), with no upper limit being defined in the Plan. The only parts of the housing supply subject to a ceiling are the SUEs, where the upper figure of the 500-700 dwelling range is based on sustainability testing of each broad location and takes environmental constraints into account.
65. Even delivery of the higher figure of 7,400 dwellings would be some 1,600 – 2,200 dwellings short of fully meeting the borough's objectively assessed housing needs. However, the SUE studies conclude that there are no additional strategic-scale locations within the Green Belt which satisfy the sustainability and Green Belt criteria and are consistent with the overall spatial strategy. At present, therefore, none of the other candidate SUEs would satisfy the exceptional circumstances test of national and local policy.
66. Mindful of its inability to fully meet the housing need, the Council contacted neighbouring local authorities towards the end of the period of suspension to ask whether they could take some of the projected shortfall. As already indicated (paragraph 9), no authority felt able or willing to do so, either because they are facing similar problems of meeting their own needs or because they are currently at an early stage of review and do not have the evidence available. Many responses mentioned the desirability of on-going collaboration and cooperation at sub-regional level to determine better how housing market area needs might be met, signalling the increasing importance of cross-boundary working in the future. But at present there is no prospect of Reigate & Banstead's unmet need being accommodated elsewhere.
67. It is important to reflect on what level of need *would* be met by the minimum 6,900 dwellings (or 460 per annum). It would cater for the full need arising from the local population (330-370 dwellings per annum) and allow for some continued in-migration (90-130 dwellings per annum) from other parts of the housing market (and wider) area, including some of the unmet need from Crawley Borough. The assessed demand for market housing would be met in full (278 dwellings annually) and, as the Council points out, provision in Reigate & Banstead would be proportionately much higher than that of all other East Surrey authorities (in relation to both population size and market demand). The 100 affordable dwellings each year would be substantially less than the need, though this is largely a consequence of the affordable supply being predominantly linked to the supply of market housing. If, as at Reigate & Banstead, total housing supply is constrained, substantial alternative funding would be required if greater inroads into the affordable housing need were to be made; there was no evidence of this at the examination.

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<sup>24</sup> Sustainability Appraisal Report, Appendix F (BP8)

*Scale and location of housing - conclusion*

68. The RBCS seeks to prioritise and maximise housing provision within the urban areas, then to make appropriate use of greenfield land outside the Green Belt, and then to facilitate the highest level of development of Green Belt land which satisfies the exceptional circumstances test of national policy. Roughly three-quarters of the minimum 6,900 dwellings would cater for changes to the existing population, with one quarter providing for in-migration. A shortfall of over 2,000 dwellings against the full objectively assessed housing needs would remain, but given the environmental and other constraints across the borough, it is not possible to meet this shortfall sustainably without conflict with the other aims of the Framework. Furthermore, no nearby authority is currently prepared to take any of the unmet need. In light of compelling evidence that the Council has done all it can at present to meet its housing needs, the scale and broad location of housing provision in the RBCS is sound.
69. However, the existence of an unmet housing need means that the Council should not be complacent. The Framework (paragraph 17) encourages every effort to be made to meet the housing (and other) needs of an area. Consequently all opportunities should be taken to increase housing delivery from within the urban areas above that currently envisaged, where consistent with the overall strategy, and to maximise provision from the identified SUEs. The Council should also collaborate urgently with neighbouring local planning authorities to establish whether its unmet need can be met across the wider housing market areas, as required by paragraph 179 of the Framework.

**ISSUE 3 – WHETHER THE DELIVERY AND PHASING OF HOUSING IS SOUND HAVING REGARD TO THE REQUIREMENTS OF NATIONAL POLICY**

70. The Council's approach in the Submission RBCS was that urban extensions would only be required after 2022 when most of the supply from existing urban areas (plus Horley North East and North West sectors) was built out and no longer available. Because the testing of SHLAA evidence during the examination revealed that reliance on this strategy is unsound, the Council revised its approach to permit the earlier release of greenfield land if required to maintain the five year land supply sought by national policy. The sequential approach to greenfield release (small scale sites around Horley before Green Belt land) remains, with the precise phasing determined through the DMP.
71. Many house-builder representatives argue that the urban land supply is so restricted that greenfield sites will be required throughout the plan period and should be released in tandem with urban development. However, introducing the often easier-to-develop greenfield sites at an early stage risks undermining the "urban areas first" strategy which lies at the heart of the RBCS. Consequently an approach which allows greenfield sites only when necessary to maintain a five year supply is sound. The modifications to policy CS11 (**MM23**) and the associated text (**MM22**) establish an appropriate and effective delivery framework. The removal of any reference to "allocated" sites in clause 4 ensures that the policy would still have force should the Council fail to provide a five year supply of housing prior to allocations coming forward in the DMP.

72. The revised housing trajectory (**MM31**) is based on the latest full review of housing data (31 March 2013)<sup>25</sup> updated to reflect the phasing on certain key sites (see paragraphs 34-35 above). The trajectory predicts a total of 7,567 dwellings being completed by 2027, which is slightly higher than the 7,400 projected in the Plan which has an April 2012 base date. Whilst this is an encouraging trend which, if repeated, could reduce the scale of unmet housing need, delivery of this number is not assured for the reasons already given.

#### **ISSUE 4 – WHETHER THE PROVISION FOR EMPLOYMENT AND RETAIL DEVELOPMENT IS SOUND HAVING REGARD TO LOCAL NEEDS AND CONSTRAINTS AND THE REQUIREMENTS OF NATIONAL POLICY**

##### *Employment*

73. The Council's trend-based economic forecast predicts an increase of 8,300 jobs (6,810 full-time equivalent) to be created in the borough to 2026, equating to about 450 per annum.<sup>26</sup> This is based on average growth over the period of 2.8% pa which, given the extent of recession in the early years, implies steady economic growth in the later years. A number of other trend-based and economic scenarios were submitted, ranging from just 46 new jobs each year (5 year trend), 314 a year (over 10 years), to 744 jobs each year (16 year trend). Other than the fact that these alternative forecasts show slow initial growth followed by economic recovery, it is difficult to fully understand the wide variation between them. As the Council's forecast derives from what appears to be a reasonable and feasible overall growth rate, its figure of 450 new jobs each year is preferred.
74. Based on the number of economically active persons, the Council estimates that about 420 dwellings annually would be required to support the anticipated growth in employment. This is broadly in line with the housing target of 460 dpa. Others believe that significantly more dwellings would be required to support 450 new jobs each year. However, the borough's location on the fringe of Greater London and close to the major employment hub of Gatwick/Crawley gives rise to large scale and complex patterns of commuting. Consequently achieving a balance between employment growth and housing growth is not a main objective of the RBCS. Moreover, there is no evidence of an imbalance which would threaten delivery of the Plan's strategy.
75. 6,810 new jobs would create a total employment floorspace demand of about 125,000 sq m.<sup>27</sup> Consistent with the Plan's strategy, this is sought from within the urban areas primarily through regeneration of existing employment locations. Modifications are required to policy CS3 to better reflect national policy and to ensure that meeting the forecast employment needs is a stated objective of the Plan (**MM8**).
76. About 70% of the required employment floorspace is currently available, mainly through vacant premises and a small amount from unimplemented permissions. This leaves an outstanding floorspace requirement of about 37,250 sq m. The Council has identified capacity of about 44,200 sq m from existing employment locations, while policy CS6 seeks total employment

<sup>25</sup> As published in RBBC Housing Delivery Monitor, June 2013 (EP36b)

<sup>26</sup> Updating the Economic Evidence Base, EP13

<sup>27</sup> EP13 table 13

floorspace of about 46,000 sq m across the three sub-areas of the borough. The potential excess floorspace provision is intended to provide flexibility of supply and to allow for variations in take-up between the main employment use classes. This approach is sound. Small adjustments to the floorspace figures are included in the modifications to policy CS6 (**MM12, MM14, MM16, MM18**) which ensure consistency with the evidence.

### *Retail development*

77. A quantitative retail needs assessment was carried out using a widely respected methodology which uses forecasts of population growth and retail expenditure.<sup>28</sup> The Council imported the floorspace requirements from this study into the RBCS; based on constant market shares, there is a need for 25,800 sq m of comparison floorspace and 11,700 sq m of convenience floorspace to 2027.<sup>29</sup> These figures were not contested at the examination and, subject to the proviso that forecasts for more than 10 years hence are difficult to predict reliably and should be treated as a guide, they are sound.
78. The Submission RBCS did not include figures for Banstead or Horley centres, merely stating that retail floorspace provision should be "limited". To give greater clarity and guidance, specific convenience and comparison floorspace figures for these centres are included in the modifications to policy CS6 (**MM12** and **MM18**). Retail floorspace figures are expressed in terms of minima ("at least.....") on the basis that they are the minimum required to maintain constant market shares. Any limited overshoot of the target figure would serve to claw back some of the trade that currently flows outside the borough and/or reduce the extent of overtrading. The Council proposes to set out environmental controls in the DMP to prevent retail expansion substantially above the given figure.
79. In Banstead it is argued that physical constraints on the availability of land in the village centre, coupled with competing proposals for housing and employment, justify the quantum of retail floorspace being phrased as "approximately" rather than "at least". The Council intends to define town centre boundaries in the DMP and whilst there is no evidence that all the proposed uses could be accommodated, neither is there evidence that they could not. In any event, the practical difference between a figure stated "at least" rather than "approximately" is very small and not a matter that goes to the soundness of the Plan.

## **ISSUE 5 – WHETHER THE APPROACH TO PROTECTION OF THE NATURAL AND BUILT ENVIRONMENT IS CONSISTENT WITH NATIONAL POLICY**

80. The North Downs part of the Surrey Hills AONB which bisects the borough is relatively narrow and is buffered by an 'Area of Great Landscape Value' (AGLV) designated by Surrey County Council and carried forward in the BLP. Following a recent appraisal of landscape character, Natural England is considering a review of AONB boundaries which might result in some of the AGLV being reclassified as AONB.<sup>30</sup> Until any such review is completed, the RBCS seeks to afford a similar level of protection to the AGLV as to the AONB.

<sup>28</sup> EP14

<sup>29</sup> EP14 Table 7.1

<sup>30</sup> EP24 and RBBC/15 Annex 1

However, the Submission Plan did not provide clear guidance on the approach to any AGLV land which is not subsequently incorporated into the AONB. **MM4** indicates that, if appropriate, new local landscape designations and policies for their protection will be introduced in the DMP; this approach is sound.

81. The approach to the built environment was formulated prior to publication of the Framework and policy CS2 did not give sufficient recognition to the importance of conserving the historic environment and the setting of heritage assets. **MM7** addresses this matter and is required to ensure consistency with national policy.

## **ISSUE 6 – WHETHER THE APPROACH TO SUSTAINABLE DEVELOPMENT, SUSTAINABLE CONSTRUCTION AND SUSTAINABLE TRAVEL IS SOUND AND CONSISTENT WITH NATIONAL POLICY**

### *Sustainable development*

82. Paragraph 15 of the Framework indicates that, to be positively prepared, local plans should be based upon and reflect the presumption in favour of sustainable development which lies at the heart of national policy. Plans should contain clear policies that will guide how the presumption is to be applied locally; a model policy suggests an appropriate way of meeting this expectation. To ensure full compliance with the Framework, the Council proposes to add such a policy to the RBCS (**MM1**).
83. The main criteria used to establish whether development is considered sustainable are set out in policy CS8. Criterion 7 sought, amongst other matters, to maximise renewable energy production. To reflect the balance that is inherent in the Framework between renewable energy production and any adverse environmental impacts, and to replace a more detailed and now revoked policy in the SEP, the Council proposes **MM19**. This approach is sound.

### *Sustainable construction*

84. The Framework allows for local requirements for sustainable construction to be set as long as they are consistent with the Government's zero carbon buildings policy and national standards. This is a continually evolving field and during the examination the Council proposed various amendments to its approach to reflect the latest information and experience. Part of policy CS9 enables certain sustainability elements of Code for Sustainable Homes (CSH) Level 4 to be prescribed in certain locations or types of housing provided these can be 'traded' for other elements. This is an appropriate local response to national policy. A measure such as the level of embodied carbon in new development can be a useful indicator, but it would require a different approach to that preferred by the Council and is not necessary to make the Plan sound.
85. Although the ability of the Council to require CSH Level 4 was not disputed, there was much debate about the viability implications of the package of measures sought by the Plan. In the absence of agreement about the additional costs of various measures, published DCLG figures are a reasonable guide. Ultimately, balanced judgements have to be made on a site by site basis. Achieving CSH Level 4 may have an impact on other requirements, such as the amount of affordable housing that can be delivered. The

important point is that policy CS9 enables viability to be taken into account, thereby allowing for variation if the particular circumstances require it. Whilst in many cases a process of negotiation will be required, which costs both time and money, the innate variability in individual site circumstances at different stages of the economic cycle means that a "one size fits all" approach is unlikely to be achievable.

86. The submission RBCS required strategic and major development to (at least) investigate the potential for connection to decentralised energy networks. The latest Government advice indicates that heat density is a more important consideration than size in determining schemes in which decentralised energy networks are likely to be viable, and the Council has modified policy CS9 accordingly. The modified policy encourages and facilitates the creation of (or connection to) decentralised energy networks; given recent experience of such schemes within the borough, this is a reasonable approach. Concerns about the feasibility and viability of such networks are acknowledged, but appropriate safeguards are included within the policy.
87. Towards the end of the examination the Government published a consultation on housing standards<sup>31</sup> which signalled its intention to replace the Code for Sustainable Homes and to separate planning and technical requirements for new housing. No decision has yet been made on how to proceed. In response, the Council has sought to "future-proof" its approach by making appropriate references to any future regime which replaces CSH. The revisions to policy CS9 and the associated text which address all these matters, and ensure that the Plan is effective, are set out in **MM20** and **MM21**.

### *Sustainable travel*

88. The strategy of locating most new development in areas of the borough that are highly accessible raises understandable concern that the already congested transport network will not be able to cope. Policy CS15 seeks to address this concern in three ways – by managing demand and reducing the need to travel, by improving the efficiency of the transport network, and by facilitating more sustainable transport choices. This approach has the support of Surrey County Council (as local highway authority) and the Highways Agency. Modelling of different development scenarios carried out during plan preparation identified a number of areas where network improvements are required.
89. Redhill town centre is the location most affected by the transport impact of development proposed in the RBCS. Funding for a "Balanced Network" package of improvements for the town centre has recently been secured. Funding for a range of sustainable transport initiatives in Redhill and Reigate has also been received. These complementary schemes are forecast to make an appreciable improvement to movement through Redhill town centre and benefit all transport users in the Redhill/Reigate area. Overall the studies suggest that, subject to implementation of the above schemes and any specific improvements necessary to accommodate individual developments, the proposed scale of growth can be accommodated without serious adverse consequences for transport and travel. Whilst some local scepticism remains,

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<sup>31</sup> Housing Standards Review Consultation, DCLG August 2013

there is no cogent evidence that the measures proposed to cater for the increased travel demand will not be adequate.

90. The measures in policy CS15 which aim to improve transport choices omit any reference to the need for travel assessments and travel plans to accompany proposals for development which generate significant amounts of movement. Given the importance placed upon these matters in the Framework, **MM27** and **MM28** are necessary to rectify this shortcoming.

## **ISSUE 7 – WHETHER THE PLAN MAKES SOUND PROVISION FOR A RANGE OF HOUSING IN TERMS OF MIX, AFFORDABILITY AND TYPE**

### *Housing mix and affordability*

91. Policy CS12 seeks a range of housing types, sizes and tenures and encourages the provision of housing for the elderly and those with specialist support needs. There is no compelling evidence that the increasing demand for Extra Care housing for the elderly warrants a link to policy CS1a to facilitate small scale releases of Green Belt land specifically for such a purpose. Nevertheless, individual proposals for specialist elderly care accommodation could still be promoted and assessed against the policies of this Plan and the Framework.
92. The affordable housing viability study<sup>32</sup> tested various thresholds and proportions of affordable housing provision against a range of value levels found across the borough. Of the development options examined, the Council proposes to adopt a borough-wide target of 30% on sites of 15 dwellings or more, the level that was demonstrated to be viable across most value areas. Arguments were made at the examination for both higher and lower levels in particular circumstances.
93. The case for 40% affordable housing stems from the evidence that this level could be sustained on greenfield sites in higher value areas. However, it is apparent that a very high proportion of qualifying sites are likely to be in lower value areas so the opportunities for greater provision are limited. As to the argument that large greenfield developments such as SUEs are more likely to be able to sustain a 40% level of provision, there was concern that the considerably higher infrastructure costs on large sites had not been accounted for. As the Council acknowledged, because the viability study only tested schemes of up to 100 dwellings (and 25 units for houses alone), there is no solid evidence on the viability of 40% affordable housing on SUEs.
94. The generally higher site costs often encountered on previously-developed land in urban areas is the basis for arguments that the affordable housing proportion should be lower than 30%. Indeed, the viability study does suggest that previously-developed sites in some lower value areas are unlikely to be viable at 30%. However, there is considerable force to the Council's argument that it would be very difficult to develop an area-based sliding scale approach to affordable housing targets. Policy CS13 allows for the proportion to be negotiated on a case by case basis taking viability into account, so flexibility is built into the policy.

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<sup>32</sup> EP5



95. Overall, on the available evidence a borough-wide figure of 30% affordable housing is appropriate. Before the next review the Council should consider undertaking a more wide-ranging viability study to establish whether there is justification for setting targets which reflect, in particular, the broad cost differential between brownfield and greenfield sites. As to the concern about the level of provision sought within regeneration areas and on redevelopment sites, the additional flexibility to policy CS13 arising from **MM24** is necessary to allow for the wide range of circumstances in which replacement affordable housing could be required.

#### *Provision for travellers*

96. At the time of RBCS submission the assessed need for traveller sites was unclear. A 2007 East Surrey Gypsy & Traveller Accommodation Assessment<sup>33</sup> provided a global figure for four Council areas, while a 2009 regional study apportioned 9 gypsy/traveller pitches and 4 travelling showpeople plots to the borough by 2016, though this was never tested at examination. The Council published its own Traveller Accommodation Assessment in early 2013<sup>34</sup> which identified a need for 52 pitches for gypsies/travellers and 13 plots for travelling showpeople. In accordance with national policy (Planning Policy for Traveller Sites – PPTS), this level of need is identified in a much revised RBCS section on travellers.
97. The Council adopts the same sequential approach to traveller site provision as it does to “bricks and mortar” housing – urban areas first, then rural areas outside the Green Belt, then land within the Green Belt. In principle this is sound. Because of the limited supply of urban land and the pressure on it for a range of uses, coupled with the specific requirements of traveller sites, the prospect of accommodating much of the need within the urban areas is slim. Some opportunities may exist in the rural surrounds of Horley, but again the potential land supply is limited and much of it is constrained. Consequently it is probable that some sites in the Green Belt will be required. Because the scale of need has only recently become known, the Council has not been able to assess the potential supply from any of the sequential sources, particularly the Green Belt. It intends to carry out this work as part of the Green Belt review, with specific sites being allocated in the DMP.
98. This is not ideal, for establishing at least a target of need to be met should be a task for a Core Strategy. However, PPTS sets out a more robust framework for delivery of traveller sites than previously existed; because it was published at the same time as the Submission RBCS, the Council was not able to fulfil PPTS requirements during plan preparation. Furthermore, the Green Belt represents an especially strong constraint which requires a detailed study before the scale of traveller provision in the borough can be determined, and may necessitate collaborative working with neighbouring authorities. Because it would not have been sensible to further delay the examination to enable this work to take place, the pragmatic decision was taken to allow the traveller target to be decided at DMP stage. **MM25** and **MM26** modify the text and policy CS14 accordingly and are required to make the plan sound. The latter also makes minor adjustments to the site-specific criteria of policy CS14 to better reflect national policy.

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<sup>33</sup> EP11

<sup>34</sup> EP60

## **ISSUE 8 – WHETHER THE MECHANISMS FOR INFRASTRUCTURE PROVISION, IMPLEMENTATION AND MONITORING ARE SUFFICIENTLY ROBUST TO ENSURE THE DELIVERY OF DEVELOPMENT**

### *Infrastructure provision*

99. The RBCS starts from the well-established principle that, to be sustainable, new development should either avoid adverse effects on services and infrastructure or, if that is not possible, should mitigate those effects. Policy CS10 and the accompanying text set out the criteria and processes for securing infrastructure delivery, drawing on the detailed Infrastructure Delivery Plan<sup>35</sup> prepared alongside the Core Strategy. Although this section of the RBCS has been much modified since the Submission version, the changes are intended to clarify and inform and do not affect the soundness of the Plan.
100. One of the infrastructure priorities identified for the Low Weald Area in policy CS6 is provision of a comprehensive playing space/sports facility for residents of Horley North East and North West sectors. The policy indicates that this will be secured through the saved policies of the 2005 BLP and the DMP, as appropriate; the former proposes land at Smallfield Road in the south of Horley as a Town Park. The owners of this land argue that there is no proven need for such a facility, that the site is outside the catchment set out in the Council's open space study, and that the land is not available for recreation use in any event. The Council indicates in the IDP that alternative options to the BLP Town Park proposal are being explored and has added a footnote to this effect to policy CS6. These options include a location within the Horley North West sector; it was stated that provision for such an eventuality is included in the draft section 106 agreement for that development.
101. There is no compelling evidence that the need for a playing space/sports facility at Horley does not exist; in any event, the question of need should be revisited as part of the consideration of the size and location of the facility at the time a specific proposal is made. This is a detailed matter that should properly be resolved through the DMP, not the Core Strategy. The argument that the Council is seeking to by-pass the plan-making process by rolling forward a previous policy allocation is not well-founded – the authority is committed to a review of urban open land at DMP stage and it is reasonable to expect that BLP open space allocations will form part of that review. Overall the approach in the RBCS to a new playing space/sports facility at Horley is sound.

### *Implementation and monitoring*

102. The Submission RBCS provided details of the implementation framework that is in place to support the proposed growth and the mechanisms for working with a range of implementation partners. However, it failed to back this up with a sufficiently robust and targeted system for monitoring delivery against specified objectives. A crucial part of deliverability is regular monitoring against key performance indicators and an indication of the remedial action to be taken if targets are missed. The Council addressed this during the examination with the preparation of a revised Monitoring Framework<sup>36</sup> and an

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<sup>35</sup> BP3

<sup>36</sup> BP20

additional policy (CP16); the latter gives a commitment to regular monitoring and specifies a range of management actions which may be employed to secure the timely delivery of development and infrastructure. **MM29** and **MM30** modify the text and introduce new policy CP16; both are necessary to make the RBCS sound.

## Assessment of Legal Compliance

103. Questions arose over the adequacy of the publicity given to the proposed modifications in December 2012/January 2013 – in particular, whether the 2012 Regulations were satisfied. Regulation 18(2)(c) requires a local planning authority to notify “such residents ..... from which the local planning authority considers it appropriate to invite representations”. The Council did not notify individual residents in the locality of the proposed sustainable urban extensions because the RBCS identifies broad areas of search rather than specific sites for development. Instead, the Council issued press releases and notified local organisations, residents’ groups and all individuals who had previously made representations on the RBCS; it also issued a leaflet part way through the consultation period which specified the broad location of the two Green Belt areas of search.
104. It is important to recognise the distinction between the consultation procedures for a planning application, where a site notice or neighbour notification are prescribed by statutory regulation, and those for a local plan where a planning authority has discretion. Where only broad areas of search are identified I think the Council is right not to notify local residents directly, not least because it would have been very difficult to specify exactly who to notify given that the boundaries of areas of search are not precisely defined. However, I do believe that the Council could have taken greater care at the outset of the consultation process to ensure that the nature of the proposed modifications (specifically, the loss of Green Belt and the broad location of the areas of search, as stated in the leaflet) was apparent.
105. Nevertheless it is obvious from the scale of the representations<sup>37</sup> that a large number of residents became aware of the proposals and were able to respond. In practice the examination itself afforded a proper opportunity for the planning issues arising to be discussed and, furthermore, the resulting main modifications have now been the subject of full public consultation. Overall I consider that the consultation process was not so obviously flawed as to lead me to conclude that the Council failed to comply with Regulation 18(2)(c). Turning to the related matter of whether there was compliance with the Statement of Community Involvement (SCI)<sup>38</sup>, this is based largely on the Regulations and incorporates many discretionary elements; in these circumstances I am satisfied that there was compliance with the SCI.
106. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

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<sup>37</sup> Over 360 responses, five times as many as responded to the previous consultation, and a 1,250 signature petition.

<sup>38</sup> BP4

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	The Core Strategy is identified within the approved LDS (February 2012 update) which sets out an expected adoption date of December 2012. The slippage arising from suspension of the examination is explained in the Council's Annual Monitoring Report.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in March 2010 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM).
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The AA stage of the Habitats Regulations Assessment has been carried out and is adequate.
National Policy	The Core Strategy complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The Core Strategy complies with the Act and the Regulations.

## Overall Conclusion and Recommendation

107. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Reigate & Banstead Core Strategy Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*Martin Pike*

INSPECTOR

This report is accompanied by the Appendix containing the Main Modifications

## Appendix – Main Modifications

The modifications below are expressed in the conventional form of ~~strikethrough~~ for deletions and underlining for additions of text, and/or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the March 2012 Proposed Submission Document and do not take account of the deletion or addition of text.

Ref	Page	Policy/ Paragraph	Main Modification
<b>MM1</b>	17	After 5.1.3	<p><i>Insert new policy:</i>  <u>Policy CS0: Presumption in favour of sustainable development</u>  <u>1. In assessing and determining development proposals, the Council will apply the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to secure development that improves the economic, social and environmental conditions in the area.</u>  <u>2. Unless material considerations indicate otherwise, proposed development that accords with policies in the development plan - including this Core Strategy (and where relevant with policies in neighbourhood plans) - will be approved without delay, and proposed development that conflicts with the development plan will be refused.</u>  <u>3. Where there are no policies relevant to the application or where relevant policies are out of date at the time of making the decision the Council will grant permission unless:</u>  <u>a. The adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in the National Planning Policy Framework as a whole;</u>  <u>or</u>  <u>b. Specific policies in the National Planning Policy Framework indicate that development should be restricted; or</u>  <u>c. Any other material considerations indicate otherwise.</u></p>
<b>MM2</b>	19	5.1.13	<p>Our spatial strategy acknowledges that, <del>in the longer term, beyond 2022,</del> as development opportunities within the urban area become more limited, some <del>greenfield</del> <u>development on land outside the current urban area may will</u> be required. <del>Greenfield</del> <u>Such development will only be acceptable in the most sustainable locations, and Green Belt boundaries will only be altered in exceptional circumstances, and through the plan-making process: further detail about this process is provided in policies CS1b, CS4 and CS11. in the latter part of the plan period, when regeneration objectives and the two new Horley neighbourhoods have been delivered and other development opportunities within the urban area exhausted.</u></p>
<b>MM3</b>	21	Box 4	<i>See replacement Box 4 at end of Schedule.</i>
<b>MM4</b>	26	Policy CS1	<p><i>Re-number as policy CS1a and modify as follows:</i>  <u>Policy CS1a:</u>  .....  b. All <del>other</del> areas of countryside outside of the AONB, <del>(and the</del></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><del>AGLV whilst it remains in force</del>) have their own distinctive landscape character. <u>The landscape character of the countryside outside the current (or revised) AONB boundary which will be protected and enhanced through criteria based policies in the DMP including, if and where appropriate, new local landscape designations. In those areas of countryside allocated for development, policies will be included in the DMP in relation to the design and siting of development to minimise the impact on landscape character.</u></p> <p><del>c.</del> The borough’s commons will be maintained and enhanced for the benefits of farming, public access and biodiversity.</p> <p><del>d.</del> The Mole Gap .....</p> <p><del>e.</del> Sites of Special Scientific Interest .....</p> <p><del>f.</del> Urban green spaces, green corridors and site specific features which make a positive contribution to the green fabric and/or a coherent green infrastructure network and will, as far as practicable, be retained and enhanced.</p> <p><del>2.</del> A robust and defensible Green Belt will be maintained to ensure that coherence of the green fabric is protected and future growth is accommodated in a sustainable manner.</p> <p><del>2.3.</del> The Council will work with a range of partners .....</p>
<b>MM5</b>	27	Section 5.3	<p><i>Insert new section 5.3 and re-number existing 5.3 (and subsequent paragraphs) as 5.4:</i></p> <p><u>5.3 Green Belt</u></p> <p><u>5.3.1 Stretching across all three landscape areas of the borough is the Metropolitan Green Belt: approximately 70% of the borough, and most of its ‘green fabric’, is covered by Green Belt designation.</u></p> <p><u>5.3.2 Green Belt is a policy designation with the fundamental aim to prevent urban sprawl by keeping land permanently open. National policy requires that the Green Belt be protected from inappropriate development and that once established, boundaries should only be altered in exceptional circumstances through the plan making process. The South East Plan indicated (Policy SP5) that a Green Belt review may be required around Redhill-Reigate to meet regional development needs.</u></p> <p><u>5.3.3 In developing the Core Strategy, we have concluded (on the basis of existing evidence) that sustainable urban extensions to deliver the housing target in policy CS11 will be required. In exceptional circumstances limited areas of land may be removed from the Green Belt for this purpose and allocated for development through the plan making process. As set out in policy CS4, the exceptional circumstances test will include consideration of the need for development, the suitability and availability of sites to accommodate that development, and will require demonstration that removal of land will result in no or limited conflict with the purposes and integrity of the Green Belt.</u></p> <p><u>5.3.4 It is also probable – given some of the constraints to the provision of Gypsy, Traveller and Travelling Showpeople accommodation in the urban area and countryside beyond the Green Belt – that there will be a need to consider limited alterations to Green Belt boundaries to accommodate Traveller sites (for example to inset a site within the Green Belt). Further</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>information is provided in policy CS14.</p> <p><u>5.3.5 A detailed Green Belt review will be carried out to inform the DMP. This review will assess the extent to which parcels of land contribute to the purposes and integrity of the Green Belt (as identified in national policy). It will identify where boundaries can be revised to align with clear physical features and without compromising the essential characteristics of the Green Belt.</u></p> <p><u>5.3.6 National policy also requires that Green Belt boundaries should be capable of enduring beyond the plan period. Further work will be undertaken as part of the DMP – based on both existing evidence and new studies such as the detailed Green Belt review – to consider where land should be safeguarded. Safeguarded land to meet development needs beyond the current plan period would only be allocated for development through a Local Plan review process.</u></p> <p><u>5.3.7 There are proposals in other plans that could also affect the Green Belt. The Surrey Waste Plan 2008 identifies Copyhold Works, Redhill, and Land at Earlswood Depot and Sewage Treatment Works, Redhill as sites within the borough where development related to waste treatment/management is considered suitable. It also has policies that recognise the possibility that other waste related development may need to be located in the countryside. Copyhold Works, Redhill is also identified as a suitable site for aggregates recycling in the Aggregates Recycling Joint Development Plan Document. The Surrey Minerals Plan identifies Chilmead Farm, Nutfield Marsh as an area of search for possible future silica sand production. Sites identified in the Surrey Waste Plan, Surrey Minerals Plan and Aggregates Recycling Joint DPD will be shown on the Proposals Map.</u></p>
<b>MM6</b>	27	Section 5.3	<p><i>Insert new policy after new Section 5.3 above:</i></p> <p><u>CS1b: Green Belt</u></p> <p><u>1. A robust and defensible Green Belt will be maintained to ensure that the coherence of the green fabric is protected and future growth is accommodated in a sustainable manner.</u></p> <p><u>2. Planning permission will not be granted for inappropriate development in the Green Belt unless very special circumstances clearly outweigh the potential harm to the Green Belt.</u></p> <p><u>3. In exceptional circumstances land may be removed from the Green Belt and allocated for development through the plan making process. Exceptional circumstances may exist where both (a) and (b) apply:</u></p> <p style="padding-left: 40px;"><u>(a) There is an overriding need for the development in order to secure the delivery of the strategic objectives and policies of the Core Strategy, and either:</u></p> <p style="padding-left: 80px;"><u>(i) The development proposed cannot be accommodated on land within the existing urban area or on land which is in the countryside beyond the Green Belt; or</u></p> <p style="padding-left: 80px;"><u>(ii) The development of land within the Green Belt would represent a significantly more sustainable option than (i).</u></p> <p style="padding-left: 40px;"><u>(b) There is no or limited conflict with the purposes and integrity of the Green Belt.</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>4. <u>The Council will undertake a Green Belt review to inform the DMP and Policies Map. This review will include:</u></p> <ul style="list-style-type: none"> <li><u>(a) Consideration of the purposes of the Green Belt to inform the identification of land for sustainable urban extensions within the broad areas of search identified in policy CS4.</u></li> <li><u>(b) Addressing existing boundary anomalies throughout the borough</u></li> <li><u>(c) Reviewing washed over villages and areas of land inset within or currently beyond the Green Belt throughout the borough.</u></li> <li><u>(d) Ensuring clearly defined and readily recognisable boundaries which are likely to be permanent and are capable of enduring beyond the plan period.</u></li> </ul> <p>5. <u>In accordance with (3) and (4) above and the provisions and considerations set out in policies CS4, CS8 and CS14, land required for development will be removed from the Green Belt and allocated through the DMP.</u></p> <p>6. <u>Land may also be safeguarded through the DMP in order to provide options to meet development needs beyond the plan period. Safeguarded land will only be allocated through a subsequent local plan review and will be subject to Green Belt policy until such time.</u></p>
<b>MM7</b>	27	Policy CS2	<p>Policy CS2 Valued Townscapes <u>and the historic environment</u></p> <p><del>1e. Development will be</del> <u>Be designed sensitively to respect reflect local heritage and to protect, conserve, and enhance the historic environment, including heritage assets and their settings. Development proposals that would provide sensitive restoration and re-use for heritage assets at risk will be particularly encouraged.</u></p> <p><del>2.</del> <u>Development will respect, maintain and protect the character of the valued townscapes in the borough, showing consideration for any detailed design guidance that has been produced by the Council for specific built-up areas of the borough. Proposals will:</u></p> <ul style="list-style-type: none"> <li>a. <u>Reflect high standards of sustainable construction ....</u></li> </ul>
<b>MM8</b>	31	Policy CS3	<p>Policy CS3 Valued People <u>and Economic Development</u></p> <p>1. The Council will promote and support continued sustainable economic prosperity and regeneration in Reigate &amp; Banstead by:</p> <ul style="list-style-type: none"> <li>...d. <u>Planning for Ensuring a range of types and sizes of employment premises to provide for future needs and cater for the needs of established, growing and start-up businesses; and ensuring sufficient flexibility to meet the their changing needs of existing businesses and attract new businesses.</u></li> <li>e. <u>Planning for the delivery of additional employment floorspace to meet the forecast growth needs of the borough, by:</u> <ul style="list-style-type: none"> <li>i. <u>Focusing on retaining and making the best use of existing employment land, particularly within existing town centres and industrial areas unless it can be demonstrated that there is no reasonable prospect of a site being used for that purpose over the life of the plan; and</u></li> <li>ii. <u>Ensuring that any new employment development outside</u></li> </ul> </li> </ul>



Ref	Page	Policy/ Paragraph	Main Modification
			<p>these areas reflects wider policy priorities and is located in accordance with sustainability principles. ...</p> <p>2. The Council will:</p> <p>... c. Empower, support, and actively work with local communities, as part of the Local Community Action Plan (LCAP) process and to facilitate neighbourhood planning.</p>
<b>MM9</b>	32 - 33	6.2.3 - 6.2.8	<p><i>Delete and replace with new paragraphs 6.2.3 - 6.2.10:</i></p> <p><u>6.2.3 The Core Strategy sets out the overall strategy for growth in the borough. Detailed site allocations for development, and policies to guide the design, phasing and siting of development, will be included in the DMP. Other DPDs may also need to be brought forward in future years to allocate additional sites should they be needed.</u></p> <p><u>6.2.4 Urban areas first: Our spatial strategy is based on an ‘urban area first’ approach. This reflects national policy guidance, and the constrained nature of the borough. The fact that the borough sits within the Metropolitan Green Belt means that the Council has to manage future land supply carefully to ensure that development can be delivered sustainably both now and in the future.</u></p> <p><u>6.2.5 The Council’s priority areas for growth and regeneration are Redhill town centre, Horley town centre, Preston and Merstham regeneration areas and the two new neighbourhoods in Horley. The other town centres also offer opportunities for sustainably located development, and many other urban locations are highly accessible and well suited for future development. Smaller scale development may also be appropriate in other urban areas. This approach will enable the use of existing services and infrastructure, promote the efficient reuse of urban land and ensure that allocated sites are sustainable and consistent with the Council’s overarching spatial strategy. Further information about this approach is provided in section 5.1.</u></p> <p><u>6.2.6 The Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA), a review of employment land, a landscape character assessment and a retail and leisure needs assessment to support the development of the Core Strategy. These, along with other technical evidence, will inform the identification of site allocations. Further work will include an assessment of current urban designations, such as urban open land, and consideration of additional potential that might exist in these locations.</u></p> <p><u>6.2.7 Development outside the urban area: In the longer term (beyond 2022 based on current evidence) development opportunities within the urban area are likely to become more limited, especially in relation to housing provision. Our spatial strategy therefore recognises that some development on land currently outside the urban area will be needed to accommodate sustainable urban extensions providing up to 1,600 homes. If identified urban opportunities fail to come forward, sustainable urban extensions will be required earlier in the plan period; conversely, if unanticipated but sustainable, opportunities come forward in the urban area this will mean that the need for development on land currently outside the urban area is pushed back or that the scale will be less than</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>currently estimated.</p> <p><u>6.2.8 Three broad areas of search have been identified for sustainable urban extensions to deliver housing, with indicative capacities for development:</u></p> <p><u>a. small scale opportunities adjoining the urban area of Horley, for up to 200 homes.</u></p> <p><u>b. the area to the East of Redhill and East of Merstham, with potential for up to 500-700 new homes</u></p> <p><u>c. the area to the South and West of Reigate with potential for up to 500-700 new homes.</u></p> <p><u>6.2.9 The DMP and Policies Map will allocate sites for development within these areas of search. Further technical work and testing will be undertaken. This will include a detailed Green Belt boundary review, and assessment of sustainability (including consideration of local level constraints and opportunities - for example, flood risk, biodiversity, landscape, amenity value - and the infrastructure and service requirements resulting from new development).</u></p> <p><u>6.2.10 Sites identified through these studies will be further scrutinised against Core Strategy policies and will be subject to Sustainability Appraisal before choices are made about land allocations. Following identification of sites in the DMP, masterplans may be prepared to ensure that any sustainable urban extensions (or other allocations) are located, planned, designed and delivered sustainably. Further information in relation to trigger points for the release of land currently outside the urban area for housing is provided in policy CS11.</u></p>
<b>MM10</b>	34	Policy CS4	<p><i>Delete and replace with new policy:</i></p> <p>Policy CS4 Allocation of Land for Development</p> <p><u>1. Development sites will be allocated in the Development Management Policies Document, or through other DPDs, taking account of sustainability considerations including environmental and amenity value, localised constraints and opportunities, the need to secure appropriate infrastructure/service provision, and the policies within this Core Strategy.</u></p> <p><u>2. The Council will give priority to the allocation and delivery of land for development in sustainable locations in the urban area, that is:</u></p> <ul style="list-style-type: none"> <li>• <u>The priority locations for growth and regeneration:</u> <ul style="list-style-type: none"> <li>- <u>Redhill town centre.</u></li> <li>- <u>Horley town centre.</u></li> <li>- <u>Horley North East and North West sectors.</u></li> <li>- <u>Preston regeneration area.</u></li> <li>- <u>Merstham regeneration area.</u></li> <li>- <u>Other regeneration areas as identified by the Council and its partners.</u></li> </ul> </li> <li>• <u>The built up areas of Redhill, Reigate, Horley and Banstead:</u></li> <li>• <u>Other sustainable sites in the existing urban area.</u></li> </ul> <p><u>3. The Council will also allocate land beyond the current urban area for sustainable urban extensions, based on an assessment of the potential within the following broad areas of search (in order of priority):</u></p> <p><u>a. Countryside beyond the Green Belt adjoining the urban area of Horley</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>b. East of Redhill and east of Merstham</u>  <u>c. South and south west of Reigate</u>  <u>Sites beyond the current urban area will be released for development in accordance with policy CS11 and detailed phasing policies within the DMP.</u></p>
<b>MM11</b>	38	6.4.4	<p><u>Housing in the urban area: Banstead Village is a small centre serving mostly local needs with moderate public transport accessibility. As a result of its constrained nature and limited accessibility it is not identified as a strategic location for high growth levels or high density housing there are only a limited number of development opportunities in and around the village. Some suburban settlements, particularly in the north-west of the area, have reasonable accessibility and provide opportunities for residential intensification which will come forward as windfall sites. Most other settlements in the area have fewer services and lower transport accessibility than Banstead. These settlements and generally have low potential for accommodating high levels of growth. Collectively, the settlements (including Banstead) will provide for at least 930 845 residential units for the period 2012-2027 2012-2022. Housing will primarily .....</u></p>
<b>MM12</b>	39	Policy CS6 Area 1	<p><i>Replace table at Part 1 of policy CS6 Area 1 with new table set out at end of Schedule.</i></p>
<b>MM13</b>	43	6.6.8	<p><i>Delete and replace with new paragraph, re-number as 6.6.9:</i>  <u>6.6.9 Future expansion potential: The area to the East of Redhill, and East of Merstham, has been identified as a broad area of search for sustainable urban extensions with capacity for up to 500-700 new homes. Sites will be allocated through the DMP, which will also establish the scale of development and the phasing of individual sites. The detailed phasing of sites will take account of the need to provide site-specific mitigation measures. It may also be related to the delivery of strategic infrastructure schemes, such as:</u>  <u>a. the balanced network highway scheme in Redhill</u>  <u>b. the provision of sufficient school capacity (secondary and primary)</u>  <u>c. Improvements to service provision within Merstham Estate Local Centre.</u></p>
<b>MM14</b>	44	Policy CS6 Area 2a	<p><i>Replace table at Part 1 of policy CS6 Area 2a with new table set out at end of Schedule.</i></p>
<b>MM15</b>	47 - 48	6.7.8	<p><i>Delete and replace with new paragraph, re-number as 6.7.9:</i>  <u>6.7.9 Future expansion potential: The area to the South and South West of Reigate has been identified as a broad area of search for sustainable urban extensions with capacity for up to 500-700 new homes. Sites will be allocated through the DMP, which will also establish the scale of development and the phasing of individual sites. The detailed phasing of sites will take account of the need to provide site-specific mitigation measures. It may also be related to the delivery of strategic infrastructure schemes.</u></p>
<b>MM16</b>	49	Policy CS6	<p><i>Replace table at Part 1 of policy CS6 Area 2b with new table set</i></p>

Ref	Page	Policy/ Paragraph	Main Modification
		Area 2b	<i>out at end of Schedule.</i>
<b>MM17</b>	52	6.8.7	<i>Delete and replace with new paragraph, re-number as 6.8.8: <u>6.8.8 Future expansion potential: The opportunity for some small scale sustainable urban extensions adjoining the Horley urban area has been identified. Development in this location will only be acceptable on sites allocated through the DMP, which will also establish the scale of development and phasing of individual sites. The detailed phasing of sites will take account of the need to provide site specific mitigation measures. It may also be related to the delivery of strategic infrastructure schemes, and may need to take account of any reliance on infrastructure being delivered as part of the North East and North West sectors.</u></i>
<b>MM18</b>	53	Policy CS6 Area 3	<i>Replace table at Part 1 of policy CS6 Area 3 with new table set out at end of Schedule.</i>
<b>MM19</b>	58	Policy CS8	<i>Modify clause 7 of policy CS8: 7. Minimise the use of natural resources, and contribute to a reduction in carbon emissions, by re-using existing resources, maximising energy efficiency and renewable energy production, minimising water use, and reducing the production of waste, including through sustainable construction methods. <u>Encourage renewable energy/fuel production whilst ensuring that adverse impacts are addressed, including on landscape, wildlife, heritage assets and amenity.</u></i>
<b>MM20</b>	59	7.2.2 - 7.2.3	<i>Delete and replace with new paragraphs 7.2.2 - 7.2.10: 7.2.2 In order to achieve these <del>rough</del> <u>demanding</u> national and local carbon emissions reduction targets, new development in the borough needs to play its part, through meeting high standards of design and construction. Technological development and commercialisation is moving rapidly: at the same time national standards, through Building Regulations, are becoming tighter. Our policy approach therefore recognises that minimum requirements will increase over the plan period; <u>however as a starting point it expects new housing to meet Code for Sustainable Homes Level 4.</u> 7.2.3 <u>The Code is a national standard for the sustainable design and construction of new homes, which aims to reduce carbon emissions and create homes that are more sustainable. Code levels are achieved through a combination of (i) meeting mandatory elements and (ii) earning credits in relation to other 'tradeable' sustainability elements.</u> 7.2.4 <u>The Council may require through the DMP, or encourage through supplementary guidance, minimum standards for some 'tradeable' Code elements (in certain locations or in relation to particular types of housing) to meet the overall Code Level 4 requirement. In instances where a higher number of credits on some tradeable elements is required to mitigate against identified sustainability issues, this will be balanced by an equivalent reduction in the number of credits expected from other tradeable elements.</u> 7.2.5 <u>National policy requires that local authorities have a positive strategy to promote energy from low carbon sources and identify such opportunities. It is recognised that the</u></i>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>common, least-cost approach to achieving the mandatory Code Level 4 emission rate standard is through the further improvement in fabric standard, combined with technologies installed at the dwelling scale. However, the achievement of zero-carbon targets, when introduced in 2016, is likely to see biomass-based community energy strategies tending to be more cost effective, particularly in larger-scale, higher density development scenarios.</p> <p>7.2.6 The Government has stated its intention to wind down the Code for Sustainable Homes and replace it with nationally described standards and/or revised Building Regulation. As appropriate, the Council may introduce national standards (justified by local evidence of need and viability if required) through the DMP or other DPD. This would then supersede the requirements of Policy CS9 in relation to the Code.</p> <p>7.2.7 Policy CS9 provides a local context to national policy requirements by giving strategic direction to enable the opportunities for decentralised and renewable or low carbon energy to be fully investigated. DECC's National Heat Density Maps will be used to identify areas of significant heat density exceeding the current widely accepted industry threshold of 3,000KW/Km2 where further investigation will be expected. This will inform joint working with developers and other partners to ensure that both cost and environmental benefits can be captured.</p> <p>7.2.8 For strategic development proposals (or development proposals which, cumulatively, contribute to strategic development), decentralised energy networks for cooling, heating and power can make a significant contribution to the reduction of carbon emissions, and can utilise local resources such as wood fuel. The Council will expect this option to be explored in development proposals that will create a high level of demand for heat and power. In addition, to help ensure that opportunities for decentralised energy networks are maximised, proposals for non-strategic major development may be required to connect to existing or future decentralised energy networks.</p> <p>7.2.9 Policy CS9 will be operated with sensitivity to the viability and feasibility of development. If it is clearly demonstrated that a development would be unviable due to the application of this policy, the Council will negotiate a viable solution.</p> <p>7.2.10 Further guidance on how developers can achieve lower carbon development will be provided through the DMP and/or supplementary guidance. This will include information about both on-site measures and off-site allowable solutions.</p>
<b>MM21</b>	59	Policy CS9	<p><i>Delete and replace with new policy CS9:</i></p> <p>Policy CS9 Sustainable Construction</p> <p><u>1. The Council will expect new development to be constructed to the following standards (taking into account the overall viability of the proposed development at the time the application is made):</u></p> <p><u>a. New housing: to a minimum of Code for Sustainable Homes Level 4, or future nationally described standards (justified by local evidence if required). To achieve Level 4, the Council may require (through the DMP) or encourage (through</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>supplementary guidance) minimum standards for some tradeable Code elements to be provided in particular locations or for particular types of housing development.</p> <p>b. Relevant non-residential development of new or replacement buildings, or extensions to existing structures: to a minimum of BREEAM ‘very good’.</p> <p>2. The Council will work with developers and other partners to encourage and promote the development of decentralised and renewable or low carbon energy (including combined heat and power) as a means to help future development meet zero-carbon standards affordably.</p> <p>a. Where a major development is planned that generates, is within, or is adjacent to an area of significant heat density, it will be expected that the potential to create, or connect to, a district heating network is fully investigated. Such developments will be identified in the DMP where possible.</p> <p>b. Where a district heat network exists or is planned, or where there is potential to utilise waste heat, the Council may require – where feasible and viable - development in these areas to be designed to facilitate its use and connect to it.</p>
<b>MM22</b>	62	7.4.1 - 7.4.4	<p><i>Delete and replace with new paragraphs 7.4.1 - 7.4.7:</i></p> <p>7.4.1 The borough is planning for the provision of a total of at least 6,900 homes over the plan period from 2012-2027, equivalent to an annual average provision of 460 homes per year.</p> <p>7.4.2 This figure takes into account the level of provision identified for the borough through the (now revoked) South East Plan.</p> <p>7.4.3 It is also based on an analysis of the levels of need and demand for housing in the borough, an assessment of housing land supply and consideration of the social, economic and environmental implications of housing growth. There is considerable pressure for housing across the South East, including in Surrey and the Gatwick Diamond area. At the same time, the borough is subject to high levels of constraint (including landscape and nature conservation designations, areas of flood risk, and the Green Belt). This amount of housing recognises the need to provide homes for local people and to support economic growth. It provides for internally-generated natural change and some continuing net in-migration to the borough which would contribute towards meeting unmet needs of other local authorities including those within the wider East Surrey and North West Sussex HMAs. The level of growth is broadly in line with longer term trends. But it also takes account of the importance of delivering existing priorities, ensuring that – through regeneration – our communities are in the best position to support future growth in a sustainable manner, and respecting and safeguarding designated areas and local character.</p> <p>7.4.4 The DMP will identify and allocate sufficient land to ensure that there is a continued supply of housing sites to deliver this figure in line with national guidance. This process will reflect the order of priority set out in policy CS4. A housing trajectory will be prepared annually indicating delivery against local policy and the planned phasing and distribution of future</p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>housing provision.</p> <p><u>7.4.5 Housing provision will be focused within the existing urban area, in particular to deliver the priorities for regeneration and growth identified in policy CS4. Our evidence indicates that we can deliver at least 5,800 homes within the urban area over the plan period. Although other unanticipated urban opportunities may come forward, current housing land supply evidence indicates that it will not be possible to accommodate the total level of planned housing growth within the existing urban area. Broad areas of search for sustainable urban extensions to accommodate the additional housing required to deliver the housing target (up to 1,600 homes) have therefore been identified and are set out in policy CS4. Where these broad areas of search are within areas of Green Belt, land will only be removed from the Green Belt if exceptional circumstances can be demonstrated in accordance with policy CS1b.</u></p> <p><u>7.4.6 The release of sites for sustainable urban extensions will be triggered if the Council is unable to demonstrate a five year land supply, based on the residual annual housing requirement calculated over the plan period 2012-2027.</u></p> <p><u>7.4.7 The DMP will take account of site specific factors in allocating and phasing sustainable urban extension sites for development. This will include:</u></p> <ul style="list-style-type: none"> <li><u>a. the need to provide any mitigation measures to minimise the impact of new development on the natural or built environment (for example, flood risk mitigation measures or green infrastructure measures).</u></li> <li><u>b. the need to provide infrastructure to support the new development itself (for example, local services/facilities or transport infrastructure improvements).</u></li> </ul> <p><u>In phasing sites for development, the Council will also ensure that relevant strategic infrastructure requirements (such as those set out in policy CS6) are in place to meet the requirements of the borough’s existing and new population.</u></p>
<b>MM23</b>	62	Policy CS11	<p><i>Delete and replace with new policy CS11:</i></p> <ol style="list-style-type: none"> <li>1. The Council will plan for delivery of at least 6,900 homes between 2012 and 2027, equating to an annual average provision of 460 homes per year.</li> <li>2. Housing delivery will be delivered as follows:             <ol style="list-style-type: none"> <li><u>a. At least 5,800 homes within existing urban areas, in particular the priority areas for growth and regeneration identified in policy CS4.</u></li> <li><u>b. The remainder to be provided in sustainable urban extensions in the locations set out in policy CS4.</u> <ol style="list-style-type: none"> <li><del>a. 2012–2022: within the existing urban area, in particular the priority regeneration areas and the Horley North East and North West sectors.</del></li> <li><del>b. 2022–2027: within the existing urban area, and as necessary through one or more sustainable urban extensions.</del></li> </ol> </li> </ol> </li> <li>3. The Council will <u>identify and allocate in the DMP the necessary sites to deliver these homes in accordance with the policies in the Core Strategy.</u></li> <li><u>4. Sites for sustainable urban extensions within the broad areas of search set out in policy CS4 will be released when such</u></li> </ol>

Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>action is necessary to maintain a five year supply of specific deliverable sites (based on the residual annual housing requirement). The phasing of sustainable urban extension sites will be set out in the DMP and will take account of strategic infrastructure requirements.</u></p>
<b>MM24</b>	65	Policy CS13	<p>Policy CS13 Affordable Housing</p> <p>.....</p> <p>2. The mix of tenures, including rented, and a mix of sizes and types should <u>reflect meet</u> the current assessment of housing needs.</p> <p>3. The Council will negotiate to achieve affordable housing taking account of the mix of affordable units proposed and the overall viability of the proposed development at the time the application is made.</p> <p>a. New residential developments comprising 15 <del>net dwellings</del> or more <u>net dwellings</u> should provide 30 percent of housing as affordable.</p> <p>b. For residential developments of between 10 and 14 net dwellings, a financial contribution <u>broadly</u> equivalent to provision of 20 percent affordable housing will be sought, so that affordable housing can be provided elsewhere in the borough.</p> <p>c. For residential developments of 1-9 net dwellings, a financial contribution <u>broadly</u> equivalent to provision of 10 percent affordable housing will be sought, so that affordable housing can be provided elsewhere in the borough.</p> <p><u>d. In some regeneration areas an alternative level of affordable housing provision may be sought to achieve a more balanced community and deliver other regeneration initiatives.</u></p> <p>4. On sites being redeveloped where there is existing affordable housing (or sites where the most recent use has been affordable housing), as a minimum the same number of affordable homes should be re-provided, and be consistent with current mix and tenure requirements <u>unless agreed otherwise with the Council.</u></p> <p><del>5. The Council may consider, in some regeneration areas and future site allocations, an alternative level of affordable housing, or alternative provision to achieve a more balanced community.</del></p>
<b>MM25</b>	66	7.7.1	<p><i>Delete and replace with new paragraphs 7.7.1 - 7.7.6:</i></p> <p><u>7.7.1 The Council will seek to ensure that sufficient sites are made available to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople. In identifying their needs, reference will be made to the latest Traveller Accommodation Assessment (2013). This identifies a need for 52 pitches for Gypsies and Travellers and 13 plots for Travelling Showpeople over the next 15 years.</u></p> <p><u>7.7.2 A target for pitches and plots will be included within the DMP. In determining the target figure, opportunities to allocate sites sufficient to meet the identified need within the urban area and countryside beyond the Green Belt will be given priority.</u></p> <p><u>7.7.3 However it is probable - given the need to ensure that sites are suitable, affordable and deliverable, and some of the</u></p>



Ref	Page	Policy/ Paragraph	Main Modification
			<p><u>environmental constraints that exist in these areas - that there will be a need to consider some limited alterations to Green Belt boundaries to accommodate Gypsy, Traveller and Travelling Showpeople sites. Exceptional circumstances will need to be demonstrated if land is to be taken out of the Green Belt to accommodate sites.</u></p> <p><u>7.7.4 Whilst the Council is committed to meeting the identified level of need as far as possible, it is not able to conclude at this Core Strategy stage whether sites can be allocated to meet the full need without compromising the purposes or integrity of the Green Belt. The final target will therefore need to be informed not only by capacity within urban areas and countryside beyond the Green Belt, but also by the findings of the detailed Green Belt review (see policy CS1b).</u></p> <p><u>7.7.5 As well as identifying pitch and plot targets, the DMP will also allocate the sites needed to provide a five year supply of specific and deliverable sites and broad locations for growth in years six to ten (based on the final targets).</u></p> <p><u>7.7.6 This Core Strategy policy sets out the criteria which will be used to identify sites and to determine planning applications relating to sites not allocated in the DMP.</u></p>
<b>MM26</b>	66	Policy CS14	<p><i>Delete and replace with new policy CS14:</i></p> <p><u>1. The DMP will identify a local target for Gypsy, Traveller and Travelling Showpeople sites and make provision for a five year supply of specific deliverable sites and broad locations for growth for years six to ten. Provision will be made for sites for Gypsies, Travellers and Travelling Showpeople to meet identified locally arising needs.</u></p> <p><u>2. A sequential approach will be taken to identifying suitable sites, with possible sites within the urban area being considered first, then all other countryside not within the Green Belt, then sites in the Green Belt. Any site considered for allocation must be deliverable (including affordable to its intended occupiers) to ensure that needs are met. The lack of any suitable, affordable and deliverable sites in the urban area or other countryside not covered by Green Belt <del>would</del> provide the <del>very special</del> <u>exceptional</u> circumstances necessary to <u>justify alterations to allocate sites in the Green Belt boundaries to meet a specific identified need for a Traveller site.</u></u></p> <p><u>3. The following criteria will be used to assess the suitability of sites for allocation in the DMP and any planning applications for sites not allocated:</u></p> <p><u>a. The site can be integrated into the local area and co-exist with the local community.</u></p> <p><u>b. The site <del>would have</del> <u>has</u> safe access to the highway and have adequate parking and turning areas.</u></p> <p><u><del>b. c.</del> <u>c. The site <del>would provide</del> <u>provides</u> a satisfactory residential environment for its intended occupiers, <u>and on-site utility services for the number of pitches proposed</u> including space for related business activities where applicable.</u></u></p> <p><u>d. The site is not located in an area of high risk of flooding, including functional floodplains.</u></p> <p><u><del>e. e.</del> <u>e. There is adequate local infrastructure and <u>access to appropriate healthcare and local schools</u> <del>on-site utility services for the number of pitches proposed.</del></u></u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			<p>d. f. The site <del>would</del> <u>does</u> not significantly impact on the visual amenity and character of the area or the amenity of neighbouring land uses.</p> <p>4. Existing authorised sites for Gypsies, Travellers and Travelling Showpeople will be safeguarded from development which would preclude their continued occupation by these groups, unless the site is no longer required to meet an identified need.</p>
<b>MM27</b>	67	7.8.5	<p><i>Insert new sentence:</i></p> <p>.....and promote alternative transport choices. <u>In accordance with national policy, developments that generate significant amounts of movement will be required to provide travel plans and transport assessments. The requirement to provide a travel plan will be determined with reference to guidance issued by the County Council and the requirement to provide a transport assessment will be determined in line with the Department for Transport's 'Guidance on Transport Assessments' (2007). The Council's Green Infrastructure Strategy .....</u></p>
<b>MM28</b>	68	Policy CS15	<p><i>Insert new clause 3d:</i></p> <p><u>d. Requiring the provision of travel plans and transport assessments for proposals which are likely to generate significant amounts of movement</u></p> <p><del>d</del>e. Seeking to minimise parking provision .....</p>
<b>MM29</b>	70	Box 6	<p><i>Delete Box 6 and replace with new paragraphs 8.5 - 8.9:</i></p> <p><u>8.5 In the event that regeneration priorities do not progress as anticipated, additional management actions to 'unlock' regeneration projects will be implemented, which may include the use of Council-owned land interests to act as a catalyst for the development of sites; to consider options to address any economic viability issues; the use of planning powers such as compulsory purchase orders; and the exploration of other funding/forward funding mechanisms.</u></p> <p><u>8.6 Employment and retail development: The effective delivery of employment and retail growth is an important part of our overall strategy for the borough. Where monitoring indicates that there is a significant gap between identified targets and anticipated land supply over the plan period, or a significant shortfall in opportunities that are deliverable in the short term, then management and contingency actions will be implemented. These may include the review of allocations, consideration of the acceptability of enabling development and/or the use of planning powers such as local development orders.</u></p> <p><u>8.7 Housing development: Performance against the housing trajectory will be regularly monitored, and the Council will publish information about its five year land supply annually. If monitoring indicates that delivery of allocated sites is not progressing as anticipated, then management and contingency actions will be implemented. This may include the consideration of options to address any economic viability issues in relation to specific sites.</u></p> <p><u>8.8 Sustainable urban extension sites will be released for</u></p>

Ref	Page	Policy/ Paragraph	Main Modification
			development if the Council is unable to demonstrate a five year land supply, based on the residual annual housing requirement calculated over the plan period 2012-2027. <u>8.4 8.9</u> ...The IDP will be regularly updated and reviewed to ensure that our understanding of infrastructure requirements remains relevant, responding to local circumstances, changing delivery mechanisms and funding regimes. <u>In the event that priority elements of infrastructure are not progressing as anticipated, the Council will work closely with partners and landowners and may jointly implement management actions and contingency measures. These may include considering opportunities to divert financial contributions to aid delivery, or exploring alternative funding opportunities.</u>
<b>MM30</b>	72	After 8.9	<i>Insert new policy CS16:</i> <u>CS16 Implementation and Monitoring</u> <u>1. Progress towards the development targets set out in the Core Strategy and the delivery of allocated sites will be regularly monitored and reviewed by the Council.</u> <u>2. To secure the timely delivery of development and infrastructure, a range of management actions and/or contingency measures will be used as part of the on-going monitoring and review process. The Council will work with landowners and developers proactively to facilitate the delivery of all allocated development sites and other sustainable development opportunities. Measures may include:</u> <ul style="list-style-type: none"> <li>• <u>The use of Council's land interests to act as a catalyst for development</u></li> <li>• <u>Negotiation on particular sites to overcome specific economic viability issues</u></li> <li>• <u>Using planning powers such as compulsory purchase orders or local development orders</u></li> <li>• <u>Facilitating land assembly by assisting with the relocation of existing users</u></li> <li>• <u>Preparing masterplans or development briefs</u></li> <li>• <u>Exploring alternative funding mechanisms and/or the potential for enabling development.</u></li> </ul>
<b>MM31</b>	77	Appendix 2	<i>Replace with new Housing Trajectory at end of Schedule.</i>

**MM3: Replacement Box 4**

	<u>Area 1: The North Downs</u>	<u>Area 2: Wealden Greensand Ridge</u>	<u>Area 3: The Low Weald</u>	<u>Borough total</u>
<u>Characteristic</u>	<u>Small settlements within the Green Belt</u>	<u>Main borough centres – Redhill &amp; Reigate – conglomeration within Green Belt</u>	<u>Horley; other small settlements within Green Belt. Adjacent to Gatwick airport</u>	
<u>Housing scale, location and density</u> *	<u>At least 930 homes to be delivered within the urban area</u>	<u>At least 1,610 homes to be delivered within the urban area</u>	<u>At least 2,440 homes to be delivered within the urban area,</u>	<u>At least 6,900</u>

			<u>including through the Horley sectors</u>	
	<u>At least 815 homes to be delivered through windfalls and other urban broad locations</u>			
		<u>Up to 1,000-1,400 homes through sustainable urban extensions</u>	<u>Up to 200 homes through small scale sustainable urban extensions</u>	
	<u>Development densities will reflect the overall character and context of the area, including levels of accessibility and surrounding densities.</u>			
<u>Employment (subject to regular monitoring of demand levels)</u>	<u>Approximately 2,000sqm</u>	<u>Approximately 20,000sqm, including approximately 7,000sqm in Redhill town centre</u>	<u>Approximately 24,000sqm</u>	<u>Approximately 46,000sqm</u>
	<u>Re-use and intensification of existing employment land, maximising opportunities within town centres and the most accessible locations</u>			
<u>Retail # (subject to regular monitoring of demand levels)</u>	<u>Banstead Village centre: At least 1,300sqm of comparison floorspace and 1,200sqm of convenience floorspace</u>	<u>Redhill and Reigate town centres: At least 19,350sqm of comparison floorspace and 7020sqm of convenience floorspace</u>	<u>Horley town centre: At least 3,870sqm of comparison floorspace and 2,340sqm of convenience floorspace</u>	<u>At least 25,800sqm comparison floorspace and at least 11,700sqm convenience floorspace</u>
<u>Regeneration</u>	<u>Preston: to deliver social, economic and environmental improvements.</u>	<u>Redhill town centre: to deliver economic growth and transport improvements. Merstham: centred around a new community hub.</u>	<u>Horley town centre: regeneration to support planned expansion of town. Two new neighbourhoods providing sustainable urban extensions to Horley.</u>	

*\* Figures suggested for each broad area of search for sustainable urban extensions are indicative and subject to detailed testing through the DMP. This testing will consider locations in the order of priority set out in policy CS4, following which detailed site capacity and phasing will be finalised.*

*# A minimum amount of floorspace (1,290sqm comparison and 1,170sqm convenience floorspace up to 2027) will be shared across all local centres based on local requirements.*

**MM12: Replacement Policy CS6 Area 1 Part 1****1. Scale and location of development:**

<u>Development type</u>	<u>Location</u>	<u>Amount</u>	<u>Timeframe</u>	<u>Delivery</u>
<u>Housing</u>	<u>Within the urban area*</u>	<u>At least 930</u>	<u>By 2027</u>	<u>CS4; Saved BLP allocations and policies until replaced by the DMP</u>
	<u>Including:</u>			
	<u>Preston Regeneration Area</u>	<u>340</u>	<u>By 2022</u>	
	<u>Banstead Town Centre (excl sites with pp)</u>	<u>170</u>	<u>By 2022</u>	
<u>Employment</u>	<u>Additional employment development predominantly through reuse and intensification of existing employment land</u>	<u>Approximately 2,000sqm</u>	<u>By 2027</u>	<u>CS3; CS4; Saved BLP allocations and policies until replaced by the DMP</u>
<u>Retail</u>	<u>Banstead Village Centre</u>	<u>At least 1,300sqm comparison and 1,200sqm convenience</u>	<u>By 2027</u>	<u>CS5; Saved BLP allocations and policies until replaced by the DMP</u>

*\* Excludes contribution from windfalls and other urban broad locations.*

**MM14: Replacement Policy CS6 Area 2a Part 1****1. Scale and location of development:**

<u>Development type</u>	<u>Location</u>	<u>Amount</u>	<u>Timeframe</u>	<u>Delivery</u>
<u>Housing</u>	<u>Within the urban area*</u>	<u>At least 1,330</u>	<u>By 2027</u>	<u>CS4; Saved BLP allocations and policies until replaced by the DMP</u>
	<u>Including:</u>			
	<u>Redhill Town Centre</u>	<u>750</u>	<u>By 2022</u>	
	<u>Merstham</u>	<u>50</u>	<u>By 2017</u>	
	<u>Sustainable Urban Extensions#</u>	<u>Up to 500-700</u>	<u>By 2027</u>	
<u>Employment</u>	<u>Additional employment development predominantly through reuse and intensification of existing employment land, including office based jobs provided through redevelopment of key sites in Redhill town centre.</u>	<u>Approximately 20,000sqm (across Area 2a and 2b) including approximately 7,000sqm in Redhill Town Centre</u>	<u>By 2027</u>	<u>CS3; CS4; Saved BLP allocations and policies until replaced by the DMP</u>
<u>Retail</u>	<u>Significant retail growth in Redhill will contribute to the town centre increasing its market share for both comparison and convenience goods.</u>	<u>Comparison: at least 15,480sqm (Redhill Town Centre) Convenience (across Area 2a and 2b): at least 7,020sqm (the majority in Redhill</u>	<u>By 2027</u>	<u>CS5; Saved BLP allocations and policies until replaced by the DMP</u>

		town centre and a limited amount in Reigate town centre)		
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\* Excludes contribution from windfalls and other urban broad locations.

# Figures suggested for each broad area of search for sustainable urban extensions are indicative and subject to detailed testing through the DMP. This testing will consider locations in the order of priority set out in policy CS4, following which detailed site capacity and phasing will be finalised.

### **MM16: Replacement Policy CS6 Area 2b Part 1**

#### 1. Scale and location of development:

<u>Development type</u>	<u>Location</u>	<u>Amount</u>	<u>Timeframe</u>	<u>Delivery</u>
<u>Housing</u>	<u>Within the urban area*</u>	<u>At least 280</u>	<u>By 2027</u>	<u>CS4; Saved BLP allocations and policies until replaced by the DMP</u>
	<u>Sustainable urban extensions#</u>	<u>Up to 500-700</u>	<u>By 2027</u>	
<u>Employment</u>	<u>Additional employment development predominantly through reuse and intensification of existing employment land.</u>	<u>Approximately 13,000 sqm across Area 2a and Area 2b (excluding Redhill town centre)</u>	<u>By 2027</u>	<u>CS3; CS4; Saved BLP policies and allocations until replaced by the DMP</u>
<u>Retail</u>	<u>Reigate town centre</u>	<u>Comparison: at least 3,870sqm. Convenience (across Area 2a and 2b): at least 7,020sqm (the majority in Redhill town centre and a limited amount in Reigate town centre)</u>	<u>By 2027</u>	<u>CS5; Saved BLP policies and allocations until replaced by the DMP</u>

\* Excludes contribution from windfalls and other urban broad locations.

# Figures suggested for each broad area of search for sustainable urban extensions are indicative and subject to detailed testing through the DMP. This testing will consider locations in the order of priority set out in policy CS4, following which detailed site capacity and phasing will be finalised.

### **MM18: Replacement Policy CS6 Area 3 Part 1**

#### 1. Scale and location of development:

<u>Development type</u>	<u>Location</u>	<u>Amount</u>	<u>Timeframe</u>	<u>Delivery</u>
<u>Housing</u>	<u>Within the urban area*</u>	<u>At least 2,440</u>	<u>By 2027</u>	<u>CS4; Saved BLP allocations and policies</u>
	<u>Including:</u>			
	<u>Horley North West</u>	<u>1,570</u>	<u>By 2027</u>	

	<u>Sustainable urban extensions#</u>	<u>Up to 200</u>		<u>until replaced by the DMP</u>
<u>Employment</u>	<u>Additional employment development predominantly through reuse and intensification of existing employment land.</u>	<u>Approximately 24,000sqm</u>	<u>By 2027</u>	<u>CS3: Valued People Saved BLP policies and allocations until replaced by the DMP</u>
<u>Retail</u>	<u>Horley Town Centre</u>	<u>Comparison: At least 3,870sqm. Convenience: At least 2,340sqm</u>	<u>By 2027</u>	<u>CS5: Town and Local Centres Saved BLP policies and allocations until replaced by the DMP</u>

*\* Excludes contribution from windfalls and other urban broad locations.*

*# Figures suggested for each broad area of search for sustainable urban extensions are indicative and subject to detailed testing through the DMP. This testing will consider locations in the order of priority set out in policy CS4, following which detailed site capacity and phasing will be finalised.*

### **MM31: Appendix 2: Replacement Housing Trajectory**

(see following page)

Core Strategy Housing Trajectory: April 2013 trajectory updated to reflect later information on phasing

			Trajectory													TOTAL			
			2012 /13	2013 /14	2014 /15	2015 /16	2016 /17	2017 /18	2018 /19	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2026 /27	2012- 2027	
Area 1: The North Downs	Sites with Planning Permission	Large Permissions/Completions	75	71	31	28	4	2										211	
		Small Permissions/Completions	37	78	43	17	13	3											191
	SHLAA Sites	Preston Regeneration Area			16	55	85	80	40	30	30								336
		Rest of Area			14						10	25							49
	Broad Locations	Banstead Town Centre							42	42	43	43							170
<b>TOTAL Area 1 (The North Downs)</b>			<b>112</b>	<b>149</b>	<b>104</b>	<b>100</b>	<b>102</b>	<b>85</b>	<b>82</b>	<b>72</b>	<b>83</b>	<b>68</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>957</b>	
Area 2(a): Wealden Greensand Ridge	Sites with Planning Permission	Large Permissions/Completions	104	77	41	36	10	5										273	
		Small Permissions/Completions	32	34	21	11	9	2											109
	SHLAA Sites	Redhill Regeneration Area				90	71	50	76	45	105	125							562
		Merstham Regeneration Area				31				20									51
	Broad Locations	Rest of Area			10		30	35	25	65	30	45							240
	Broad Locations	Redhill Town Centre						50	50	50	50							200	
<b>TOTAL Area 2(a) (Redhill)</b>			<b>136</b>	<b>111</b>	<b>72</b>	<b>168</b>	<b>120</b>	<b>92</b>	<b>151</b>	<b>180</b>	<b>185</b>	<b>220</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1,435</b>	
Area 2(b): Wealden Greensand Ridge	Sites with Planning Permission	Large Permissions/Completions	51	17	13	11	5	2										99	
		Small Permissions/Completions	23	48	29	15	12	3											130
	SHLAA Sites				18	30		10										58	
<b>TOTAL Area 2(b) (Reigate and remainder)</b>			<b>74</b>	<b>65</b>	<b>42</b>	<b>44</b>	<b>47</b>	<b>5</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>287</b>	
Area 3: Low Weald	Sites with Planning Permission	Large Permissions/Completions	141	95	111	101	86	63										597	
		Small Permissions/Completions	6	36	21	9	7	2											81
	SHLAA Sites			20	33	50		45	60	75								283	
	Allocated Sites	Horley North West				100	150	150	150	160	165	150	160	150	150	76			1,561
<b>TOTAL Area 3 (Low Weald)</b>			<b>147</b>	<b>131</b>	<b>152</b>	<b>243</b>	<b>293</b>	<b>215</b>	<b>195</b>	<b>220</b>	<b>240</b>	<b>150</b>	<b>160</b>	<b>150</b>	<b>150</b>	<b>76</b>	<b>0</b>	<b>2,522</b>	
Borough-wide Broad Locations								16	16	16	17	320	320	320	320	320		1,665	
Windfalls				50	50	50	50	50	50	50	50	50	50	50	50	50		700	
<b>GRAND TOTAL DELIVERY: POSITION AT 31 MARCH 2013</b>			<b>469</b>	<b>507</b>	<b>421</b>	<b>604</b>	<b>612</b>	<b>447</b>	<b>504</b>	<b>538</b>	<b>574</b>	<b>505</b>	<b>530</b>	<b>520</b>	<b>520</b>	<b>446</b>	<b>370</b>	<b>7,567</b>	