

Ref: P18-491/JW
23 February 2018



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Dear Sir/Madam

**REIGATE AND BANSTEAD BOROUGH COUNCIL (RBBC) DEVELOPMENT MANAGEMENT PLAN (DMP),
REGULATION 19 CONSULTATION
REPRESENTATIONS ON BEHALF OF SURREY COUNTY COUNCIL PROPERTY SERVICES
SITE: POLICY RTC4 - COLEBROOK, NOKE DRIVE, REDHILL, RH1 1PT**

These representations are being made against the Development Management Plan (DMP) Regulation 19 Consultation on behalf of Surrey County Council Property Services. These representations focus on Policy RTC4, the allocation for Colebrook, Noke Drive, Redhill, RH1 1PT, but, where relevant, general comments are made against other policies that will be applicable to the development of this site.

The Development Management Plan (2018-2027) has been produced to explain in more detail how the development principles and targets set out in the Council's adopted core strategy will be delivered. The introductory second section to the DMP clarifies that the scale of growth set out in the Core Strategy is not being revisited, nor the general principles of where new development will be located.

Background: Core Strategy

The Core Strategy (July 2014) sets the overarching development principles for the Borough and identifies that Reigate and Banstead benefits from good transport links to Central London and the wider south east, along with national and international destinations via the motorway network (M23 and M25), the railway line, and proximity to Gatwick Airport. Within the Borough it identifies that *"the spatial strategy for this area recognises the need to ensure its continued success by maintaining its high economic profile – and in particular the potential for Redhill to grow physically and economically in the future."* (Core Strategy 5.1.6).

The approach for Redhill is clearly established within the Core Strategy, which identifies that:

Redhill is the main focal point for economic and cultural provision in the Borough. The town has good transport connections – it is not only a transport interchange and

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gateway for movement within the Borough but also to inter-regional and international destinations. As a commercial centre offering a wide range of office space, Redhill is an attractive employment location for both employers and employees and an accessible destination for shoppers and people to spend their leisure time. However, Redhill does not currently fulfil its potential in terms of its retail offer and range of leisure facilities... Given its strong locational advantages, Redhill is identified in the Core Strategy as the main centre for consolidation and growth. The strategy seeks to ensure that in the future Redhill realises its full potential to become the thriving centre of the borough where people want to live, work, shop and spend their leisure time. (Core Strategy, 2014, 5.1.9)

Development Management Plan Consultation: Policy RTC4 – Colebrook

The Colebrook site (Policy RTC4) is identified as an urban site allocation for approximately 110 residential units, including potentially housing for older people, and community uses. The site is owned by Surrey County Council, who are keen to see the site redeveloped and support the allocation.

The policy makes reference to a number of requirements for the site, including relating to existing trees and landscaping and green infrastructure. It is considered, given the characteristics of the site and its sustainable urban location within Redhill, including close to the town centre and train station, this should include suitable flexibility to enable any proposal and design process to make the most efficient use of the site. Therefore, it is requested that **point 2 (under “requirements”)** is amended:

- ***Design to seek to retain existing trees and enhance landscaping and green infrastructure on site.***

The explanatory text in relation to Policy RTC4 is supported; as it correctly identifies that the site *“is situated within a highly accessible location, in close proximity to Redhill town centre and adjacent to the railway station. This site provides an opportunity for intensification of an existing previously developed site”*.

The site will potentially be developed in two phases given the complexities and coordination of providing care provision throughout Surrey and the delivery of services over numerous locations. The currently drafted policy does not preclude this approach and Surrey County Council Property Services are committed to delivering the whole site.

Development Management Plan Consultation: Policy DES4, DES6, DES7

In relation to housing, Policy DES4 (housing mix) contains the details for dwelling mix/sizes and the flexibility contained within point 2, in relation to financially viable or technically feasible along with the *“adverse impact on the character of the surrounding area”* is supported. This flexibility allows each site and proposal to respond to their unique site characteristics. This approach is, to a lesser degree, reflected in Policy DES6 (affordable housing) where point 2 makes reference to negotiation and taking account of the specifics of the site. Policy DES7 (specialist accommodation) does reflect Policy DES4, where point E refers to *“not financially viable or that the physical characteristics of the site would make the development unsuitable”*.



Therefore, it is considered beneficial if there was consistency in the flexibility and approach between these housing policies. Policy DES6 (affordable housing) should reflect the wording in Policy DES4 and DES7 relating to financial viability.

This would follow paragraph 173 of the National Planning Policy Framework (NPPF), where it is clear that sustainable development requires careful attention to viability and costs in plan making, along with decision taking. Paragraph 173 states that *“Therefore, the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”*. Consequently, the policies and requirements for *“affordable housing, standards, infrastructure contributions or other requirements”* should enable the development to be delivered.

Summary

Surrey County Council Property Services are committed to the redevelopment of the Colebrook site (Policy RTC4) and supports its allocation in the DMP.

It is respectfully requested that these comments are considered, and we would also request the opportunity to discuss this site allocation at examination.

If there are any queries, please do not hesitate to contact me.

Yours faithfully

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Enc. DMP Form

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