



Planning Statement with Statement of Community Involvement

Reigate and Banstead Borough Council

Marketfield Road, Redhill

April 2016

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Document Control

Project: Marketfield Road, Redhill, Surrey

Client: Reigate and Banstead Council

Job Number: A095445

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Issue	Date	Status
1	29.04.16	Internal Review
2	29.04.16	Issue to team
3	03.05.16	Submit for planning



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1.0 Introduction

1.0.1 This Planning Statement has been prepared by WYG and is submitted in support of a full planning application made on behalf of Reigate and Banstead Borough Council (RBBC) (the applicant) for development proposals at Marketfield Way car park and the buildings fronting the High Street in Redhill town centre. Coplan Estates is the Council's development partner and it will be working together with the applicant to bring forward the development.

1.0.2 The applicant intends to significantly regenerate the town centre with the development of a positive landmark scheme. The description of development for the planning application is as follows:

"Demolition of existing buildings and redevelopment to provide new multi-screen cinema and retail, restaurant and cafe units (use classes A1 and/or A3 and/ or D2) at ground and first floor level and residential apartments within buildings comprising part five, part six, part ten and part thirteen storeys together with basement car parking and access, cycle storage and associated facilities including new amenity space and public realm".

1.0.3 The development proposals will ensure that Redhill is able to compete with neighbouring towns such as; Reigate, Epsom, Crawley and Guildford and are a positive step, providing regeneration and inward investment with a diverse retail and leisure offer.

1.0.4 The new mixed-use development will add to the town's attractiveness as a destination, as well as contribute to its vitality and viability. The scheme will contribute to Redhill's evening economy and will transform the town centre into a place where people want to live, visit and work. Approval of these Plans will help to fulfil the Council's vision, set out in the Draft Redhill Town Centre Area Action Plan:

"Redhill will be thriving town centre which is a prominent commercial location, a competitive retail destination and great place to live"

1.0.5 The development proposals follow a thorough and positive pre-application consultation process, which included extensive pre-application discussions with the Local Planning



Authority (LPA), two public exhibitions and presentations to Elected Members, the Cabinet and the Regeneration Forum. The proposals have developed in accordance with the feedback received and it is on that basis that the application is submitted. It is considered that the proposal accords with the development plan and it contributes to sustainable development by improving the economic, social and environmental conditions of the area.

1.0.6 Details of the consultation undertaken are set out in full in Section 5 (Statement of Community Involvement) of this Statement.

1.0.7 This Statement has been informed by a comprehensive set of supporting reports and plans, including detailed technical assessments of the site and the proposed development, as set out below. It should therefore be read in conjunction with these planning application documents and plans, which will provide further information on the points summarised and assessed against planning policy in this statement:

- Applications Plans and drawings;
- Air Quality Assessment;
- Below Ground Drainage;
- BREEAM Pre-Assessment;
- CIL Forms;
- Daylight and Sunlight Assessment;
- Design and Access Statement;
- Desktop Archaeological and Heritage Assessment;
- Ecological Assessment (BREEAM);
- Energy Statement;
- Fire Strategy;
- Flood Risk Assessment;
- Financial Viability Assessment;
- Landscape Plan ground floor surface finishes;
- Landscape Plan roof terraces finishes;
- Lighting Plan; (within DAS)



- Noise Assessment;
- Planning application forms and certificates;
- Planning Statement with Statement of Community Involvement;
- Schedule of Accommodation;
- Sustainability Statement;
- Townscape and Visual Impact Assessment;
- Transport Assessment;
- Travel Plan;
- Tree Constraints Plan;
- Tree Survey;
- Utilities Report;
- Ventilation Strategy;

1.1 Structure of the Report

1.1.1 This report is divided into the following sections:

- **Section 2** describes the existing site and surrounding area;
- **Section 3** details the planning history of the site and outlines the recent town centre permissions;
- **Section 4** describes the proposed development;
- **Section 5** outlines the pre-application consultation activity within a Statement of Community Involvement;
- **Section 6** provides a review of the relevant policy context, with comment;
- **Section 7** sets out the other material considerations relevant to the proposed development;
- **Section 8** is an analyses the main planning considerations;
- **Section 9** draws our conclusions in respect of the proposals.



2.0 Site Location and Planning Designations

2.0 Site Context

- 2.0.1 The Application Site measures 5,897 sq m (approximately 0.59 hectares) and is located in the town centre and within the urban area of Redhill.

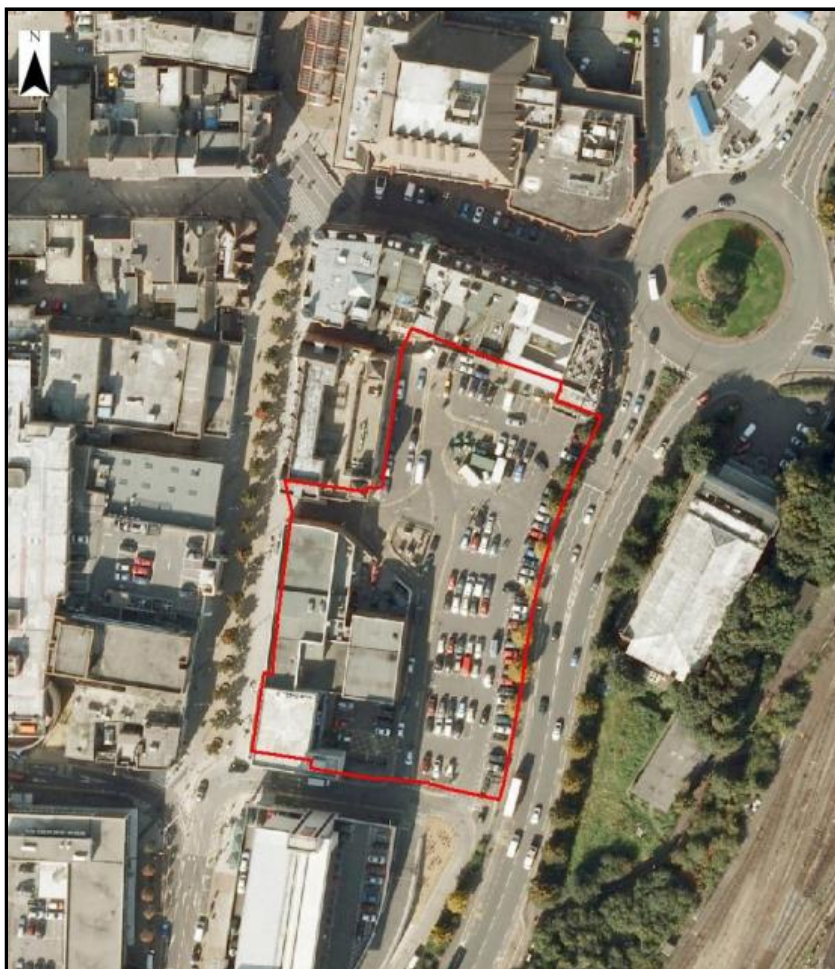


Figure 1: Site Location Plan

- 2.0.2 The site comprises a 97 space surface car park and existing buildings comprising retail and commercial uses. The site lies in-between the High Street to the west and Station Road to the north and it is located just below the Station's Roundabout to the north east. Access to the site is achieved from Marketfield Way and Marketfield Road and the existing units have retail frontages that front onto the High Street.



- 2.0.3 The site is adjoined to its northern side with commercial and retail premises accessed off Station Road (known as the Arcade), which is within a shopping street frontage. The area is characterised with a number of older properties (Victorian) backing into the site from both the High Street and Station Road. These buildings appear by and large in a state of disrepair, however, fall within the Town Centre Conservation Area Boundary.
- 2.0.4 The Boundary of the Conservation Area was drawn in 2013 and the Committee Report approving consultation on the boundary confirms that it is only the facades of the commercial premises that are suitable for retention. The boundary line was drawn to protect the physical regeneration objectives of the wider town and avoids impacting upon the potential for redevelopment of the application site.
- 2.0.5 The scale and massing of buildings surrounding the application site reflects its town centre location, with development exceeding three and four storeys in height. However, to the south there are significantly larger buildings, known as Red Central and Kingsgate, which are currently the tallest buildings in the town, these range from five to eight storeys.
- 2.0.6 Red Central (formerly Brabazon House) is located immediately to the south and is a large five storey office building with ground floor retail use. The planning application (reference: 98/11450/F) describes the building as a "*landmark*" office development.
- 2.0.7 Kingsgate House is also to the south of the site and positioned at the southern edge of Redhill Town Centre, overlooking the roundabout from Brighton Road. RBBC's Planning Committee approved both a seven storey building (reference 02/00539/F) and an eight storey building (reference 05/01276/F) at the location. The eight storey building is currently partially occupied. The Committee Report describes the building as a "*gateway feature on the southern approach to the town centre*".
- 2.0.8 The existing buildings on site contain a number of High Street chains, such as; Subway, Coral and Argos. An existing pedestrian link is located to the west of the existing car park and it connects the car park to the High Street and to the main town centre offer, including the Belfry Shopping Centre.
- 2.0.9 Redhill is experiencing a significant period of investment and renewal, demonstrated not least by Surrey County Council's £4 million Highway Improvement's Project, the Redhill Balanced Network. This project consists of a series of junction improvements, as well as improvements for walking, cycling and buses. Most of the works are complete and a new access into the car



park was created from Marketfield Way itself. The initiative is considered key in tackling traffic congestion and encouraging sustainable travel. It is intended that the Balanced Network will enable the regeneration of key sites in the town centre.

2.1 Site Specific Designations

2.1.1 The following designations are identified on the site. The extract below is taken from the 2005 Local Plan Proposals Map.

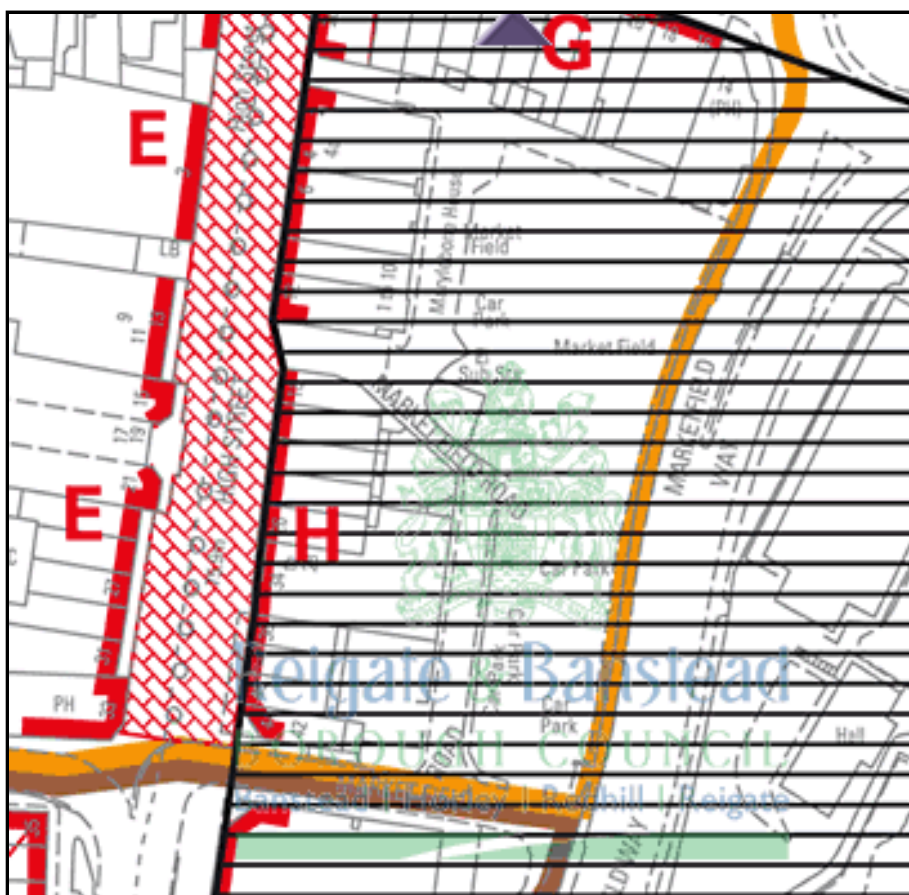


Figure 2: Proposals Map Extract

- The Site falls within an “Integrated Mixed Use Scheme”, which is denoted by the black hatching;
- The Site lies within the Town Centre Primary Shopping Area, signalled by the orange lines which bounds the site to the east and south;
- The Properties that bound the site are within the Shopping Street Frontage, denoted



by solid red lines

- The site sits directly above an area classified as "Secondary Shopping Area, which is shown by a brown line;
- The site lies adjacent a pedestrian priority area, illustrated by the red brickwork pattern;
- The majority of the site is located within Flood Zone 3, but is partly located in Flood Zone 2 as shown on the Environment Agencies Flood Zone Map.

2.1.2 The extract below, at figure 3, is taken from the Proposals Map within the Daft Redhill Town Centre Area Action Plan and illustrates a number of designations at the site:



Figure 3: Extract from the RTCAAP

- The Site falls within an area designated as a "major opportunity", which is denoted in blue;
- The Site also falls within the "Primary Shopping Area", which is illustrated by the red



hatching

- The whole of the town has been designated as an Air Quality Management Area, which requires air pollution levels to be monitored and managed;

2.2 Listed Buildings

2.2.1 The Listed Building Map at figure 4 denotes the location of Listed Buildings with blue triangles. As shown, there is only one Listed Building within the immediate area, namely the Baptist Chapel located on Station Road, which is Grade II listed.

2.2.2 The proposed development will not adversely affect the setting of this listed building. Views from the site toward the Chapel are not possible due to the scale of the adjacent buildings that enclose the site.



Figure 4: Listed Building Map Extract



2.3 Conservation Area

2.3.1 The area located to the north of the site has recently been designated a Conservation Area (Redhill Town Centre Conservation Area). The area denoted in purple identifies the location, as follows:



Figure 5: location of Redhill Town Centre Conservation Area

2.3.2 Following a number of years of consideration, and public consultation, the Council's Planning Committee approved this new Conservation Area. The Consultation Draft Conservation Area Committee Report sets out that the Council wishes to protect and enhance the remaining old buildings in Station Road, in particular those around Maple Square.

2.3.3 The Consultation Committee Report makes specific mention to the application site. In setting the boundary of the Conservation Area regard was paid to avoid impacting "upon the potential for redevelopment of Marketfield Way" (paragraph 4.2 refers). The designation of the area should not conflict with the Council's overarching regeneration objectives.



3.0 Planning History

3.0.1 We have undertaken a review of the Council’s online Planning Register in respect of the proposed development site and note the following applications have been submitted at the location.

Application ref	Proposal	Decision	Date
80P/0763	Erection of a porch at 86 High Street	Approved	29.08.1980
81P/1023/F	Change of use for the basement area of 86 High Street to food and wine bar	Approved	07.12.1981
82P/0307	Change of use to estate agents office	Approved	01.07.1982
82P/0616/F	Continued use of premises as furniture showroom	Approved	23.08.1982
92/00680/OUT	Demolition of existing building except for facade and construction of a new office buildings at Land at Marketfield Way	Withdrawn	12.11. 1992
92/12350/OUT	Demolition of existing building and construction of a new office and cinema	Refused	11.02.1993
98/11450/F	Redevelopment including demolition of existing buildings, the erection of a five storey building.	Approved	23.03.2000
04/02061/ADV	Two PVC banner signs to advertise the office	Consent	18.10.2004
16/00268/SCREEN	Request for a screening or scoping opinion under the Town and Country Planning (EIA) Regulations 2011	Environmental Impact Assessment not required	11.03.2016

Summary

3.0.2 The planning register search has revealed a number of applications that relate to general car park improvements and applications for advertisement consent for the existing retail units



within the application site. These are of little relevance for this case and we have not expanded on them accordingly.

- 3.0.3 A notable application was refused at Land at Marketfield Way in 1993 for “demolition of the existing buildings and construction of a new office and cinema”. The application was refused for a number of reasons. The first reason related to the proposals seeking substantial class B1 office development outside the Redhill Town Centre Business Area and it was on that basis that the commercial element was considered to be conflicting with the objectives of the Development Plan. The Council were not satisfied, at that time, that there was insufficient supply of office floorspace available within the Borough.
- 3.0.4 The third reason for refusal related to the construction of a new vehicular access with a proposed “right-handed turning movements across the opposing stream” which would interfere with the free flow of traffic and in turn cause danger and inconvenience to other highway users.
- 3.0.5 This scheme was refused some 23 years ago and notwithstanding this refusal, a number of key planning applications have also been approved in Redhill recently which support Redhill’s transition to a vibrant and competitive town centre. We will discuss some of these in Section 3.1 below.
- 3.0.6 In addition to the various permissions and refusals noted, above, we have recently submitted a Screening Opinion (reference: 16/00268/SCREEN) to the LPA as the proposed development falls within Schedule 2 of the EIA Regulations and includes more than 150 units. The Council concluded that the site is not located within a “sensitive area” as defined in Regulation 2 (1) and the development would not have a significant effect on the environment. As such, it was the LPA’s considered opinion that a statutory Environmental Impact Assessment was not necessary.

3.1 Recent town centre permissions

- 3.1.1 Planning Application 14/00846/F was approved for the site at the former Liquid and Envy nightclub at Station Corner, Marketfield Way, which lies opposite the site. The permission was for the retention of the existing listed facade, demolition of the nightclub and redevelopment to provide 76 residential units (Class C3) and ground floor retail units with associated parking, highways works and landscaping.



3.1.2 The Case Officer, within the Committee Report, identified that the parking provision (23 spaces) on site was appropriate for the town centre location. The Report states;

"23 spaces for 76 flats represents a parking ratio of 0.30 which accords with the requirements of the Redhill Area Action Plan for 0.25 spaces per 1-bed flat and 0.37 spaces per 2-bed flat".

In addition, the proposed development of 8 storeys was considered to be appropriate for the location.

3.1.3 The Sainsbury's store in the Warwick Quadrant (at the corner of London Road and Princess Way) is in the process of being rebuilt and significantly extended. The planning permission, which has been implemented (LPA ref: 13/00168/S73), includes the significant regeneration of the Warwick Quadrant and is for the demolition of the existing office building (Lombard House) and food store and construction of a new 15,000 sqm food store, a 70 bed hotel, gym and a multi storey car park of 927 spaces. In addition, the permission included a number of townscape improvements and associated works, such as the removal of the canopy at the front of the Harlequin Theatre and additional seating and tree planting in the wider town centre.

3.1.4 An application to redevelop Redhill Train Station has recently been approved. The Planning Permission (LPA ref: 13/00848/F) was approved in 2014 and it was for the comprehensive redevelopment of the Train Station including; redevelopment of the existing station buildings and car park, a new A1 food store with retail parking and flexible retail units with 150 residential dwellings and general townscape improvements.

3.1.5 Together these planning permissions signal the Council's intentions to regenerate Redhill as a competitive centre. The submission of this application will significantly contribute to the Council's efforts to regenerate Redhill and enhance the evening economy.



4.0 The Proposed Development

4.0.1 A full description of the Application proposals and design evolution is contained in the Design and Access Statement prepared by PRP Architects. This Planning Statement should be read in conjunction with the Design and Access Statement and other technical assessments together with the formal plans and drawings submitted with the applications. The key details of the proposals are summarised in this section.

4.0.2 The proposals involve the submission of a high quality landmark town centre mixed-use development. As demonstrated through the pre-application engagement process to date (Section 5: Statement of Community Involvement refers), the development is supported, and is seen as a welcome improvement to the town, adhering to the Council's regeneration and investment aims.

4.0.3 In the first instance, the proposed development is in line with the Council's vision for Marketfield Way, noted from the Draft Redhill Town Centre Area Action Plan which seeks;

"A high quality, mixed use, retail led regeneration scheme which, with a leisure anchor, will act as a catalyst to create a step change in the towns retail offer and transform Redhill's evening economy".

4.0.4 Accordingly, the submission seeks planning permission for the following;

"Demolition of existing buildings and redevelopment to provide new multi-screen cinema and flexible retail, restaurant and cafe units (use classes A1 and/or A3 and/or D2) at ground and first floor level and residential apartments within buildings comprising part five, part six, part ten and part thirteen storeys together with basement car parking and access, cycle storage and associated facilities including new amenity space and public realm".



4.1 Residential

4.1.1 It is proposed to bring forward 153 Class C3 residential apartments for the town centre, these will be a mix of 1 or 2 bedrooms and appropriate for the town centre location. A breakdown of the mix can be summarised as follows (percentages rounded);

- 4 x Studio (3%) 1% non-wheelchair + 2% wheelchair adaptable;
- 69 x 1 bed 2 persons (44%) 41% non-wheelchair + 4% wheelchair adaptable;
- 25 x 2 bed 3 persons (16%) 13% non-wheelchair + 4% wheelchair adaptable;
- 55 x 2 bed 4 persons (36.5%) 100% non-wheelchair.

Total: 153 dwellings

4.1.2 It is proposed to provide onsite car parking (47 spaces) to support the residential component. The parking will be located at basement level under the residential blocks and it will be accessed at the southern end of the site. The parking would be accessed via the existing entrance to Marketfield Car Park and via a new ramp leading down into the basement of the residential scheme. In addition, the basement will include provision for 153 cycle stores, which is a one-for-one provision.

4.1.3 The internal floor areas of each dwelling will be in compliance with the National Described Space Standards. This demonstrates that the development has been designed to provide spacious levels of accommodation for the new residents. Within this, 75% of the dwellings will contain a private balcony and this will be complemented by a second floor open space area for use by the new community. This outdoor space will measure 320 sq m and together the development will provide sufficient private and shared amenity areas.

4.2 Flexible Retail, Cinema and Gymnasium

4.2.1 A key driver for the redevelopment of the site is to increase retail and leisure provision in the town centre. It is proposed to provide 9,442 sqm GEA of new town centre uses to complement the existing town centre offer. The retail and leisure element will be split across ten units at ground and first floor level. It is intended that these units will be flexible between Class A1 shops, Class A3 Restaurants and Cafes and Class D2 Assembly and Leisure. The proposed range of uses is to provide the applicant with as much flexibility over potential tenants joining the scheme.



4.2.2 The development will provide active frontages addressing both the High Street and Marketfield Way. Whilst flexible consent is sought for the commercial uses, the applicant's intention would be to direct retail uses to those units that tie in with the existing High Street retail and direct café and restaurant uses to be positioned so that they activate Marketfield Way. The rationale is to position the food and beverage units in closer proximity to the cinema and retain the High Street function for retail.

4.2.3 The cinema will be a six screen multiplex with a capacity of circa 800 people. This facility is to be located toward the north eastern corner of the site and located behind Station Road. The cinema will be accessible at ground floor level and the main cinema function will be located at first floor level. The cinema will total 1,765 sq m GEA and the north eastern corner of the building will be active with signage and glazing to direct people from the station.

4.2.4 Together the development will offer 9,442 sq m GEA of new town centre uses.

4.3 Layout

4.3.1 The proposed layout will make highly efficient use of the town centre site as it will occupy the entire surface car park and former high street buildings. The scheme has been designed to optimise the amount of active frontages. The layout will allow for new shop fronts along the High Street and new food and beverage units along Marketfield Way.

4.3.2 The cinema will be located on the north eastern corner of the site and the access will be on a highly prominent corner which faces Marketfield Way. The residential entrance lobby is located on a highly visible corner that gives activity to the southern edge of the scheme. The residential component is located above the retail and café/restaurant units.

4.3.3 The principal mass of the residential element will be located toward the southern end of the site in the form of two larger finger blocks. The rationale is to position the taller elements toward the southern limits of the site where it is able to complement the existing cluster of taller buildings, Kingsgate House and Red Central.

4.3.4 The taller buildings will form a landmark feature at the southern end of the application site, drawing attention to the site not only from the train station, but also from Brighton Road to the south. The site layout is pedestrian orientated and a key dissection through the site is proposed to provide a connection from the train station to the existing town centre. The



pedestrian dissection will also provide additional active frontages and enhanced opportunity for a better retail offering. This pedestrian “galleria” area will provide a part-covered space.

4.4 Scale

4.4.1 The residential development on the southern side of the scheme will range from five to thirteen storeys. The tallest element will be located on the south eastern corner of the development site to form a landmark building on a prominent corner plot. It is intended that the building will sit as part of a cluster of taller buildings and will act as a wayfinder from the Station and from Brighton Road to the south.



Figure 6: Overview of massing and layout

4.4.2 It is proposed that the buildings fronting along the High Street will range from seven and eight storeys in height. The flexible town centre uses will be located at ground and first floor and will comprise double-height glazed frontages. This will maximise the active retail space along the High Street. The height of the scheme has been designed to be sympathetic to the existing context. On the High Street side the building steps down in scale from south to north in response to Kingsgate House (south) and Marylebone House (north). The western building,



fronting onto the High Street, is vital in that it is part of the scheme which faces onto and gives the opportunity to reinvigorate the southern end of the High Street.



Figure 7: Proposed High Street Elevation

4.4.3 The cinema building is positioned on the north eastern corner and will comprise an active glazed corner feature which will act as a wayfinder from the station. The total height of the cinema from ground to roof level is 17m and it will measure approximately 4.5 residential floors.

4.4.4 Overall, it is the applicant's intention to create a bold new development in a prominent town centre location and these development proposals represent a significant opportunity to regenerate the town centre. The development can be described as landmark and will help draw attention to, and draw trade into the town.

4.5 Appearance

4.5.1 The appearance of the scheme has been carefully considered to fit within the existing town centre context and to reflect the more successful buildings surrounding the site, such as Marylebone House. Given the prominent nature of the site, the scheme will adopt high quality materials that have been chosen to be robust, attractive and stand the test of time. The accompanying Design and Access Statement should be read to understanding the rationale behind the design of the scheme.

4.5.2 It is proposed to create a proud new town centre scheme with the appearance supporting the Council's aims of vibrancy and vitality. The selected pallet of materials is varied and subtle



with the adoption of both light and darker colours. The proposed use of redbrick is akin to the material commonly found within the townscape context. Notwithstanding this, the architect's have carefully considered its use and the advice offered from pre-application discussions and therefore its use is tamed and not overused. Through subtle variation, detailing and with use of varied materials the final picture is one of quality and interest for the town.

- 4.5.3 It is proposed to reinvigorate the southern end of the High Street with a contemporary building that mediates between the scale of Kingsgate House and Marylebone by stepping down from south to north.

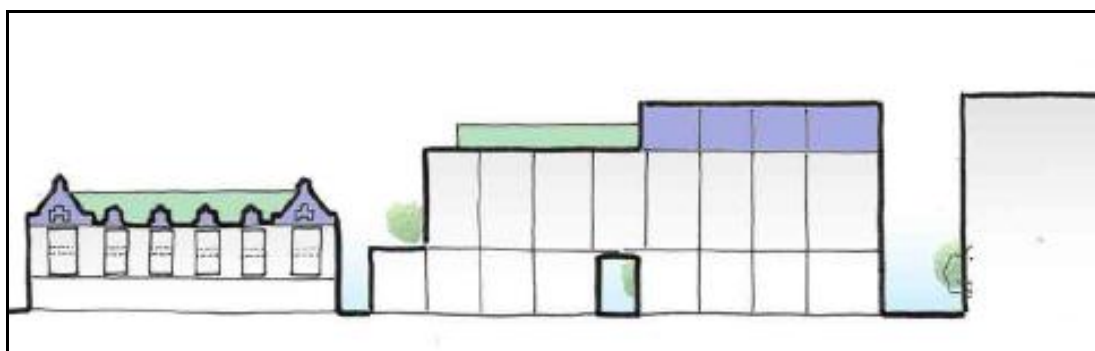


Figure 8: Architect's sketch showing mediation in scales and set back roof level adjacent to Marylebone House

- 4.5.4 The west building will respect Marylebone House with the setting back of the upper level to give room and breathability. It is also intended to retain key Victorian permanence and detailing along the High Street elevation. The elevation will contain the public access through the site. This opening will divide the retail frontage in two and enables the proportions of building frontages to become equivalent to the existing town centre. The west building is to be clad in brick with a subtle red hue which is in keeping with the context of the High Street. The elevation would comprise inset balconies to the residential apartments adding depth and activity to the facade whilst also improving the natural surveillance to the High Street.
- 4.5.5 The east building will become the landmark wayfinding feature through its appearance and scale drawing attention. The building will adopt a lighter brick cladding which will bring vibrancy and freshness to the scheme. It is intended that the lighter pallet will add an interesting contrast to the darker brick seen on the west building. The elevations of the taller east building will utilise brick piers and soldier course to introduce craft and depth to the



facade. It will adopt clean and direct lines throughout the facade and recessed balconies to assist its role as a landmark feature.

- 4.5.6 The appearance of the cinema has evolved to avoid it appearing as a blank uninspiring box within the town centre. The ground floor is set to align with the rhythm of the existing shopfront frontages along Station Road. The cinemas appearance is to be broken up with large glazed openings at opposite ends and with a series of punched openings across the facade.



Figure 9: Architects sketch of cinema elevation signalling punched openings and glazed variation

- 4.5.7 The cinema will adopt a material different from the clad brick used on the other parts of the scheme. The cinema will be clad in secret fixed copper / brass coloured metal rainscreen panels. These panels will provide a textured pattern to avoid it appearing as dull and flat. The columns dividing the frontages at ground floor will be in brickwork although a darker cladding shade will be used.

4.6 Parking and Access

- 4.6.1 It is proposed that the site would be accessed from Marketfield Road to the south of the site and Marketfield Way to the east of the site. Marketfield Road is a short cul-de-sac which provides for local access to the site as well as the Red Central and Kingsgate buildings.
- 4.6.2 It is proposed to access a servicing bay and the residential car parking from Marketfield Road. The access to the service bay and car park will be recessed into the site to form an area for light vehicles servicing the flats. Relative to the existing car park use on the site, the proposed development will give rise to fewer vehicle movements on Marketfield Road.



- 4.6.3 The Marketfield Way access will be a new 6 metre wide road to the north of the site. This will connect Marketfield Way to an internal servicing courtyard. The access onto Marketfield Way will be a heavy duty crossover allowing servicing visits. To accommodate the new access the existing pedestrian crossing will be relocated. This will be secured via a Section 278 Agreement.
- 4.6.4 The development will result in the removal of the existing surface car park. However, a parking study undertaken by Hyder on behalf of RBBC looked at parking within the town centre area. This study looked at the parking provision for the town centre areas as a whole concluding that there was an oversupply of car parking within the town, even after car parking sites such as Marketfield Way were closed and redeveloped (this is discussed in further detail in Section 8). The scheme will provide no public parking as there is surplus public parking in the town and the provision will increase further following the redevelopment of the Sainsbury's and Train Station sites.
- 4.6.5 The scheme will provide 47 car parking spaces and 153 cycle stores, located at basement level under the main residential finger blocks to the south. The ramp to the basement will be circa 3.0m wide and work on a shuttle basis controlled by traffic lights. The gradient of the ramp will be 1 in 7 and as such separate pedestrian access will be provided.

4.7 Landscaping

- 4.7.1 It is proposed that the scheme will provide significant amounts of public and private open space. A new "galleria" space through the site is proposed which will provide key connections from the station through the application site and to the rest of the town centre. It is proposed to use slab paving through the galleria area, in line with the existing paving material in the town. A more robust asphalt surfacing material will be used for the servicing areas.
- 4.7.2 As a result of the proposed works, it is likely that the trees along Marketfield Way will need to be removed, to facilitate the development. Most of the trees are considered to be low to moderate quality, as confirmed by the scheme's arboriculturists (Ian Keen Ltd). To this effect, the applicant is proposing to provide replacement planting along Marketfield Way in order to mitigate for the loss of the existing street trees. The proposed trees will be deciduous species thus providing seasonal interest and variation along the streetscene.



4.7.3 The residential development is to comprise a spacious public amenity area at second floor level. This outdoor space will measure 320 sq m and together with the private balconies on site the development will provide sufficient private and shared amenity areas.

4.7.4 The amenity space will contain shared seating space and a range of shrubs and perennial planting. The development proposals will also include a range of green and brown roofs and these will comprise wildflower planting or sedum planting, thus increasing the ecological value.

4.8 Environment Impact Assessment (EIA)

4.8.1 A request for a Screening Opinion from RBBC was made on the 29th of February 2016, in accordance with Section 5 (i) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (now referred to as the '2011 Regulations').

4.8.2 The proposed development falls within Schedule 2 (10.B Urban Development project) of the EIA Regulations, and the number of proposed residential units exceeds 150 dwellings in an urban location.

4.8.3 Our request set out full details of the proposed development and included our reasoning of why we felt the proposed development did not constitute an EIA development.

4.8.4 A response was received from the Council on the 11th of March (reference 16/00268/SCREEN) which confirmed the Council's position that the site was not located within a "*sensitive area*" and that the proposals would "*not be likely to have a significant effect on the environment*". Accordingly, the Council provided their view that a statutory Environment Impact Assessment for the proposed development would not be required.



5.0 Statement of Community Involvement

5.0.1 This Section of the Planning Statement records the consultation process of the planning application. The main scope of the consultation exercise was to inform local residents, members and stakeholders about the site redevelopment plans and to seek public feedback on them. The exercise complemented the engagement process with RBBC's Planning Department which also fed into the evolution of the development proposals.

5.1 Policy Context to Engagement

5.1.1 From a national perspective, the Localism Bill introduced by the Coalition Government in 2010 focused on the requirement for public consultation and involvement of local communities and includes:

- Greater community empowerment;
- A radical re-boot of the planning system, including neighbourhood planning;
- A requirement for developers to consult local communities before submitting planning applications for certain developments.

5.1.2 The bill, now an Act of Parliament, came into force in April 2012.

5.1.3 WYG, on behalf of RBBC, sought to follow best practice through appropriate consultation for the scale of the development proposed and provided the community with an opportunity to review and feed into the proposals prior to the planning submission.

5.1.4 Planning policy encourages comprehensive community involvement and pre application discussions to help shape appropriate development proposals. A core part of the National Planning Policy Framework (NPPF), which was published on 27th March 2012, is to encourage community involvement in the planning process.

5.1.5 The NPPF encourages applicants to engage in pre application consultation with the local community. Paragraph's 188 – 191 state:

"Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community."



Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage. they cannot require that a developer engages with them before submitting a planning application, but they should encourage take-up of any pre application services they do offer. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community before submitting their applications.

The more issues that can be resolved at pre-application stage, the greater the benefits. For their role in the planning system to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process. This assists local planning authorities in issuing timely decisions, helping to ensure that applicants do not experience unnecessary delays and costs.

The participation of other consenting bodies in pre-application discussions should enable early consideration of all the fundamental issues relating to whether a particular development will be acceptable in principle, even where other consents relating to how a development is built or operated are needed at a later stage. Wherever possible, parallel processing of other consents should be encouraged to help speed up the process and resolve any issues as early as possible."

5.2 Local Context

5.2.1 Reigate and Banstead Borough Council adopted its Statement of Community Involvement (SCI) in 2013. The SCI sets out the Council's proposals for involving the community and stakeholders in the process of preparing planning applications and major proposal for developments. It states:

"The Council expects applicants in most cases to carry out their own pre-application consultation. This should be effective in bringing draft proposals to the attention of the public, the local Town or Parish Council and other affected parties and provide opportunities to make comments. Effective ways of doing this include public exhibitions, workshops and other forums providing specific opportunities for comments to be made. Planning Officers are available to provide advice on appropriate engagement methods, target audience and venues. The Council will



expect the applicant to submit details of pre-application consultation as well as an explanation on how the responses have been taken into account, alongside their planning application. The Council will consider this information prior to making a decision”.

5.2.2 WYG, acting on the applicants behalf, has shown compliance to the requirements of RBBC’s Statement of Community Involvement and has undertaken a thorough approach to consultation in line with RBBC’s development plan.

5.3 Consultation Aims

5.3.1 The consultation sought to;

- Comply with RBBC’s Statement of Community Involvement as far as possible;
- Inform residents / stakeholders about the design, planning and development process;
- Communicate the proposals to the local community and stakeholders;
- Provide a mechanism for the community to comment on the scheme and related issues;
- Raise the profile of the scheme within the local community;
- Open lines of communication with residents, stakeholders and local businesses and organisations that will continue throughout the construction period in the event that the application is granted planning permission.

5.4 Summary of Consultation Activity

5.4.1 Activities undertaken as part of the consultation process 07/01/2016 and 11/04/16;

- Liaison with the Council’s Regeneration Team to confirm the stakeholder list and distribution area for the public exhibition;
- A press release issued on the 1st of March 2016 and placed in local newspapers to promote and advertise the scheme to the community.
- The project team presented to and met with a range of local organisations including:



Redhill Ward Members Briefing on the 25th of February

The scheme was well received with members commenting positively on the design. A few questions about car parking capacity within the town centre and cycle parking were raised. One member was very pleased to see brick as the chief material.

Redhill Regeneration Forum on the 8th of March

The scheme was well received by local businesses stating that they expect the scheme to have a positive impact on trading. Car parking in the town centre was discussed.

Presentation to Reigate and Banstead Councillors on 21st of March

The scheme was very well received. Councillors commented that the way the design process was described helped them to understand the qualities of the scheme and that this should be communicated to the public. Questions were asked about start and completion dates.

- Posters advertising the development were placed around the town to notify the local community of the proposed scheme and to invite people to attend the public exhibition;
- Letters to community and political stakeholders, providing an invitation to the public exhibition events, in all 117 residents and business were sent individual invitations. A plan indicating the distribution area is located at figure 8 (overleaf);
- A public exhibition was held over two days on Wednesday the 9th of March and Saturday the 12th of March 2016, at the former Mothercare Unit in the Warwick Quadrant (26 London Road). Exhibition boards were prepared to illustrate the development plans and representatives from the project team were available to explain the plans and answer questions. Those attending were encouraged to complete a response form. The exhibition boards were left on display between the 9th and 12th of March 2016.
- A dedicated project website was set up for the consultation period, to provide access to the exhibition boards and updates to the local community, detailing how viewers could contact the project team;
- A dedicated respondent form for residents to provide commentary on the proposal is available at Appendix A;



Figure 10: Consultation letter drop area

5.5 Pre Application Discussions (Local Planning Authority)

5.5.1 The submission follows two meetings with planning officers at RBBC on the 7th of January 2016 and the 11th of April 2016. There has also been a number of meetings and presentations with elected members, the cabinet and the Regeneration Forum regarding the development of the site. Following discussions it was considered that the principle of



redeveloping the site for the intended uses was acceptable subject to various design related queries being resolved (A copy of the first pre-application meeting at Appendix B).

5.5.2 A summarisation of the pre-application advice is as follows:

- Principle considered acceptable;
- Retail, restaurant and cinema uses welcomed;
- Optimise active frontages throughout the development;
- General massing and design appeared acceptable;
- Landmark tower feature adjacent to Marketfield Way raises some initial concern. Further details of the tower would be needed in order to understand whether this could be accommodated without harming the townscape and longer-range visual assessment / images would be necessary from the main public viewpoints;
- Avoid the cinema appearing as a “big blank box” within the middle of the town;
- General approach to design acceptable, with the positive inclusion of recessed balconies and detailing to help draw the eye welcomed;
- The proposed brick facades are acceptable, however, the overuse was discouraged in favour of more varied brick type;
- Trees and public realm planting was encouraged;
- Car parking was identified to fall below the policy requirement, however, it was considered unobjectionable given the sustainable town centre location;
- A financial viability assessment would be required to demonstrate that affordable housing is unviable.

5.5.3 In addition, a second pre-application meeting was held on the 11th of April 2016. The meeting was used to update the Planning Officer on the design evolution since the first pre-application meeting and the public consultation to date. The meeting was used to seek agreement from the Officer that the previous items of concern had been successfully dealt with thus allowing for the submission of a fully robust and considered planning application.



5.6 Public Exhibition Consultation

5.6.1 Following the first meeting with the LPA, we sought to fulfil the consultation aims through engaging with the public and stakeholders at a two day consultation event. The design team were on hand to present and discuss the scheme with the local community.

5.6.2 The team ensured that the architect's feasibility studies were on display to illustrate to members of the public the progression of the scheme and the evolution to date.



Figure 11: Design Team presenting to members of the public

5.6.3 To ensure accessibility, a one page flyer was prepared setting out details of the exhibition event. Posters were placed in high footfall areas and around the car park site itself. In addition, the event was advertised on social media. A1 boards (refer to figure 12, below) were placed in clear view to showcase the scheme.



5.6.4 Visitors were invited to view the plans and were encouraged to put questions to the design team. A comments box was left in view of the plans to encourage the public to leave feedback for the design team to consider.

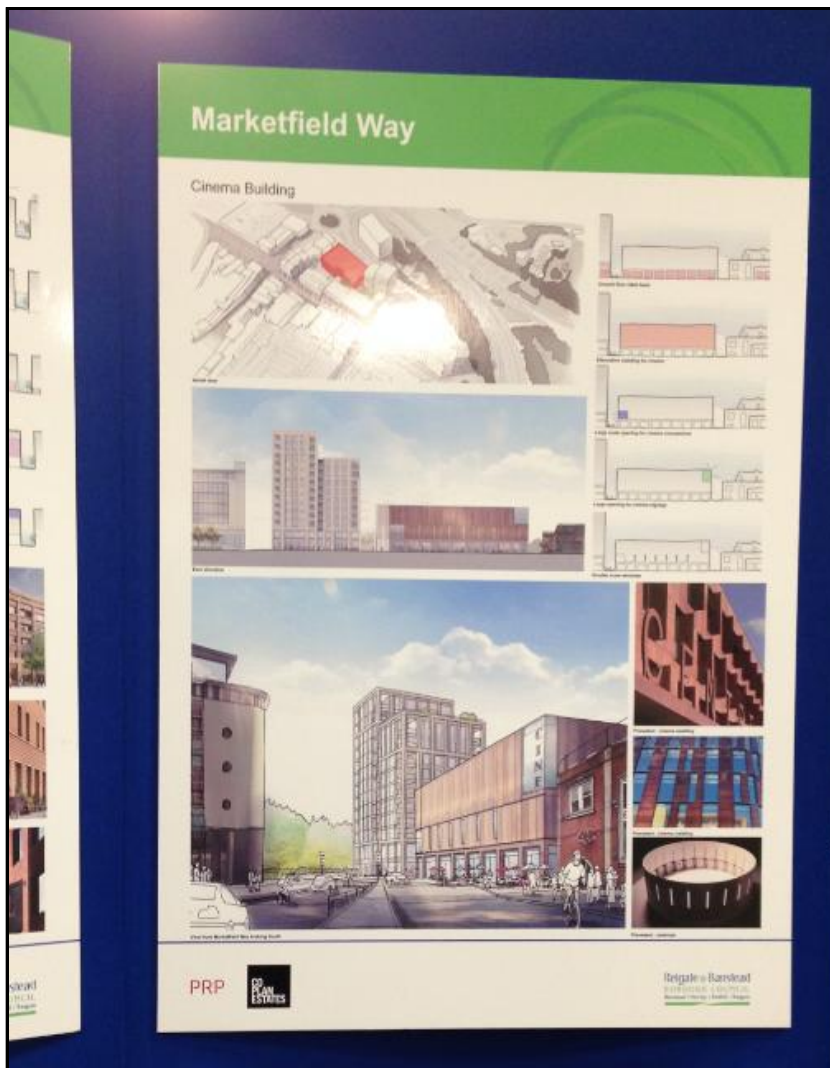


Figure 12: Exhibition Boards

5.7 Comments Form

5.7.1 The comments form was made available to individuals who attended the public exhibition and were also available online through the Council’s Regeneration Section. We requested receipt of all comments by the 18th of March. An example of a completed comments form is available at Appendix A.



5.8 Results of Exhibition

5.8.1 The public exhibitions were well attended and there is demonstrable support behind the redevelopment of the application site for the intended uses and the proposed scale and appearance of the development. In total we received 45 questionnaires either by post, online or completed at the public exhibition.

5.8.2 The following is a summary of the feedback received:

5.9 Retail and Cinema

5.9.1 In terms of improvements to Redhill's retail and leisure offer, there was overwhelming support for Redhill town centre to seek improvements in its shops, restaurants and leisure facilities with 96% (43 out of the 45 respondents) supporting the Council's intentions behind the provision of new facilities. We received only one response stating that new facilities were not needed and one respondent did not comment either way for or against this particular aspect.

5.9.2 Within this, 84% of respondents (38 out of 45) stated that they agreed that the town was in need of a new multi screen cinema and only 11% (5 people) suggesting that a new cinema is not needed. Concerns and comments related to a possible increase in traffic and congestion and some uncertainty over the proposed design of the cinema facility. A few respondents suggested that the cinema should contain sufficient facilities for wheelchair and disabled users.

5.9.3 The public submitted overwhelming support for the development of new high street shops and restaurants, with 93% saying that Redhill is in need of these. Only one negative comment was received and it related to the towns existing vacant units and suggested that these should be occupied in the first instance.

5.10 Housing

5.10.1 There was very strong support for making use of a town centre site for homes, 91% of respondents (41 people) supporting this aspect compared to 4% (2 people) not agreeing that the town was the best location for new homes. A number of concerns related to the creation of social problems and a lack of garden space for the new occupants with increased pressure on the already overstretched train network into London.



5.10.2 There was strong support for the proposed design of the new apartment blocks, 71% of the respondents supported the designs whereas 11% did not and 18% failed to submit a view either way. A small number of respondents commented that the scheme appeared too dense and too tall in the context of surrounding buildings, while some respondents thought that there was not enough parking to support new residents, leading to potential overspill onto the surrounding road network.

5.10.3 Overall, the layout and proposed connections from the train station to the rest of the high street offer was supported, 80% of comments confirmed support for the general layout, whereas, 13% did not and 7% were unsure of this feature. A number of people stated that the linkages from the station to the town were not apparent in the development proposals and would like further clarification on this aspect accordingly.

5.11 Likes and Dislikes of the Proposals

5.11.1 As part of the questionnaire people were invited to state what they liked and disliked most about the proposals. A total of 42 people responded to this question, allied to this, 36 comments were submitted identifying specific aspects of the scheme which they liked. The most common supportive comments were as follows:

- 44% of those positive comments thought that the scheme would deliver improvements to the towns evening economy and would improve general safety after dark;
- 50% of the positive comments thought the scheme would provide much needed improvements to Redhill's restaurants and leisure offer which would help with the aims of regeneration.

5.11.2 The following provide evidence of some of the comments received;

"I like best getting rid of the red brick, 70s look of Redhill. It is very dated. I want to be able to visit the town at night, at the moment I wouldn't dare go to Redhill town centre at night. I have lived here 8 years and have never gone into town at night. Not safe and nothing to offer".

"The designs are fresh and attractive. The accommodation of cinema, shops and restaurants will create a fantastic "buzzing" atmosphere. Love it! Fully supported!"



"Very excited about all of the proposed redevelopment of Redhill".

"Overall the regeneration effort is key to Redhill and this scheme will go some way on aiding Redhill's recovery".

"The new design makes the area more attractive".

"Good use of unsightly view along Marketfield Way"

"Overall it should improve the general look of the town centre, which is much needed".

"No more cheap pound shops or charity shops please. If professionals are to come and live here we will need to have decent shops and restaurants. Pizza Express, Warehouse, Oasis, Waitrose etc but also independent, upper class restaurants. No more takeaways and kebabs".

5.11.3 All advice and feedback received during these pre-application discussions and community engagement sessions has been considered in the development of the scheme. Further details of how the proposal has evolved are set out in the Design and Access Statement accompanying this application.



Figure 13: Councillor Richard Coad (Ward Member for Redhill East) with the project architect

5.11.4 In response to the pre-application comments and consultation the design has evolved to include the following design enhancements;

- The adoption of a varied and robust materials pallet to signal a movement away from the redbrick seen within the town centre;
- Cinema elevations broken up with glazed slots and openings and the use of copper / brass coloured metal rainscreen panels to avoid the cinema reading as a big blank box within the town centre;
- Re-planting of trees along Marketfield Way to help green the town centre environment;
- Provision of a public walkway "galleria" through the development which has now maximised active frontages on the scheme;
- General approach to design acceptable, with the positive inclusion of recessed



balconies and detailing to help draw the eye welcomed;

- The use of brick piers and soldier courses and vertical directional lines on the eastern block to promote its position of a wayfinding featuring;
- The planning application is submitted with a Townscape and Visual Impact Assessment which provides further detail on the eastern block to demonstrate that it can be accommodated within the townscape and longer range views.
- Car parking was identified to fall below the policy requirement, however, it was considered unobjectionable given the sustainable town centre location;

6.0 Planning Policy Context

6.0.1 This section sets out the planning policy context for the proposal. In accordance with the Planning and Compulsory Purchase Act 2004, section 38 (6), planning law requires that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

6.0.2 At national level, this planning statement assesses the relevant policies and guidance in the adopted National Planning Policy Framework (NPPF) (2012).

6.0.3 The relevant local development plan policies are set out in Reigate and Banstead's Local Plan, of which the following documents are relevant:

- Reigate and Banstead Core Strategy (2014);
- Reigate and Banstead Local Plan and Proposals Map (2005);

6.0.4 The Redhill Town Centre Area Action Plan (RTCAAP) is a material consideration in planning decisions. It is the Council's intention that the main policies and remaining site allocations within the RTCAAP will be incorporated into the Development Management Plan. It therefore carries weight in the consideration of planning decisions.

6.0.5 This is evident from the permission at the former liquid and envy site, opposite the site (LPA reference 14/00846/F), where the Officer considers the policies within recommendation to Planning Committee.

6.0.6 Therefore, consideration of the RTCAAP will form part of our planning assessment.



6.1 National Planning Policy Framework (NPPF)

6.1.1 The NPPF (published on 27th March 2012) sets out the Government's planning policies for England and how these are expected to be applied. It states that the NPPF must be taken in to account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.

6.1.2 An underlying theme running through the NPPF is that the planning system should seek to deliver sustainable development, which includes three dimensions: economic, social and environmental, and that this should be achieved by contributing to building a strong, responsive and competitive economy; supporting strong vibrant and healthy communities; and contributing to protecting and enhancing the natural, built and historic environment.

6.1.3 The NPPF states that the purpose of planning is to achieve sustainable development and is pro-growth. Indeed, the document makes it clear that:

"Planning should operate to encourage and not act as an impediment to sustainable growth" (Paragraph 19).

6.1.4 Paragraph 6 echoes this and states that the planning system should contribute to the achievement of sustainable development and, moreover, that there is a presumption in favour of sustainable development. At Paragraph 9, it states that the pursuit of sustainable development involves seeking improvements in the quality of the built, natural and historic environment, as well as in people's quality of life. Such examples include: making it easier for jobs to be created in cities, towns and villages; improving the conditions in which people live, work and travel and take leisure and widening the choice of high quality homes.

6.1.5 Twelve core planning principles are contained within. We consider that the following are relevant when considering against the proposed development:

- Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth;
- Encourage the effective use of land by reusing land that has been previously developed (Brownfield land), provided that it is not of high environmental value;
- Promote mixed use developments, and encourage multiple benefits from the use of



land in urban and rural areas.

- 6.1.6 Specifically relating to housing, at Paragraph 49, the NPPF specifically states that local planning authorities should consider applications for housing in the context of the presumption in favour of sustainable development. Paragraph 50 ensures that plans deliver a wide choice of high quality homes. The NPPF requests local planning authorities to plan for a mix of housing and it is stated at Paragraph 23 that local planning authorities should recognise that residential development can play an important role in ensuring the vitality of centres.
- 6.1.7 With regard to economic interests, the NPPF states that significant weight should be placed on the need to support economic growth through the planning system. The application of retail developments is described in Paragraphs 23 – 27. It is stated that local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres.
- 6.1.8 The NPPF makes it clear that town centres should be at the heart of communities and there should be an allocation of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited sit availability. As identified above, residential development is stated to play an important role in ensuring the vitality of centres (Paragraph 23). It is clear that town centre uses should be located in town centres (Paragraph 24).
- 6.1.9 Paragraph 56 - 58 of the NPPF relates to design, indicating that good design is fundamental to achieving sustainable development. It states that planning decisions should aim to ensure that developments have a high quality design response, that, inter alia, has regard to the establishment of a strong sense of place, functions well and adds to the overall quality of the area, responds to local character and history, creates a safe and accessible environment, supports local facilities and transport networks and is visually attractive as a result of high quality architecture and appropriate landscaping.
- 6.1.10 Section 11 of the NPPF specifically relates to the natural and local environment. At Paragraph 111 the NPPF contains a presumption in favour of the effective re-use of previously developed / brownfield land, when it is not of high environmental value.



6.1.11 Paragraph 29 – 41 seeks to promote sustainable transport. It is stated that “plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.

6.1.12 With reference to heritage matters, paragraphs 128 to 134 of the NPPF are of relevance. The National Planning Practice Guidance provides definitions and assistance in explaining the Government’s intentions for interpretation and practical application of the policy.

6.1.13 Paragraphs 158 – 159 refer to the Council’s evidence base in the formation of the Local Plan. It states that local planning authorities should have a clear understanding of housing, leisure and retail needs in their area.

6.2 Reigate and Banstead Core Strategy (2014)

6.2.1 A presumption in favour of sustainable development, as contained in the NPPF, will be taken by Reigate and Banstead Council when assessing development proposals according to Policy CS1. Therefore development that is in line with the local development plan will be approved without delay, unless material considerations indicate otherwise.

6.2.2 Sustainable development principles are further outlined in Policy CS10, which highlights 10 criteria that should be met in new developments. The policy states that developments should make efficient use of land, giving priority to previously developed land and buildings within the built-up areas. Development should be an appropriate density, taking account of and respecting the character of the local area and the levels of accessible and services. Development should minimise the need to travel, whilst increasing opportunities to walk, cycle or use public transport, including as part of the green infrastructure network. The development should also be designed to minimise pollution, including air, noise and light, and to safeguard water quality.

6.2.3 Policy CS2 relates to valued landscapes and the natural environment. In considering proposals for significant development, the Council will be required to protect and enhance the borough’s green fabric. 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 practical, be retained and enhanced.





- 6.2.4 Policy CS4 relates to valued townscapes and the historic environment. It is a key requirement for developments to respect, maintain and protect the character of the valued townscapes in the borough. Plans should be designed sensitively to respect, conserve, and enhance the historic environment, including heritage assets and their settings. It is important for developments to try and reflect the existing character and local distinctiveness and be laid out to make the best possible use of the site and to its physical characteristics. In line with this, the development should try and minimise the impact on surrounding properties and the environment and development should try and protect and where appropriate enhance existing areas of biodiversity value and the links between them.
- 6.2.5 Sustainable development is similarly echoed in Policy CS5 which deals with valued people and economic development in RBBC. The Council will promote and support continued sustainable economic prosperity and regeneration in Reigate and Banstead. This will be done by identifying, targeting and working to improve the priority regeneration areas in the Borough, such as Redhill town centre. The policy seeks to raise the distractive economic role of Redhill as a commercial location and the Council will welcome development that provides a range of employment facilities.
- 6.2.6 The Core Strategy makes it clear that Redhill town centre is a priority regeneration area. Policy CS6 provides assurances that proposals that seek to regenerate the town centre would be supported as the Council has given priority to the allocation and delivery of land for development in sustainable locations. Redhill is identified as the Borough's priority location for growth and regeneration accordingly.
- 6.2.7 With regards to towns and local centres Policy CS7 is of relevance, as the policy seeks to improve and maintain the multi-purpose role of towns and local centres. Redhill town centre will therefore be the location that should accommodate most of the growth in retail, social, community and leisure uses, at a scale appropriate to their role. The policy states that the majority of comparison and convenience retail growth to meet the strategic needs of the Borough and beyond will be accommodated in Redhill town centre. The policy makes it clear that Redhill is to be the prime focus for large scale leisure and retail developments. In accordance to the NPPF, the Council will seek to development in town centres that promote both the vitality and viability of each centre.
- 6.2.8 Policy CS11 addresses the sustainable construction of developments, stating that new housing will be expected to meet a minimum of Code for Sustainable Homes Level 4 and non-



residential development must meet a minimum of BREEAM rating 'very good'. The Council will also encourage new developments to connect to district heating networks where feasible and viable.

6.2.9 The Core Strategy also makes it apparent that housing delivery is a priority, as Policy CS13 requires a delivery of at least 6,900 homes between 2012 and 2027, equating to annual average provision of 460 homes a year. In line with making efficient use of land as prescribed by the NPPF, the policy requires at least 5,800 homes within existing urban areas, in particular in the locations set out in policy CS6 (i.e. Redhill town centre).

6.2.10 Policy CS14 ensures that the Council will seek a range of housing types and tenures through the redevelopment of the existing housing stock or new development, including affordable housing, and resist an undue concentration of any one type of dwelling in a location that would cause an imbalance and adversely affect community cohesion. The policy requires housing developments to contain a mix of dwelling sizes in accordance with assessment of housing need, site size and characteristics.

6.2.11 Policy CS15 addresses affordable housing and states that new residential development comprising 15 or more net dwellings should provide 30% of housing as affordable. 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. The Council will also consider the overall viability of the proposed development at the time the application is made.

6.2.12 Policy CS17 outlines that the Council will seek to reduce the need to travel by allocating development land in accessible locations, improving the efficiency of the transport network and facilitating sustainable transport choices, which can be achieved partly by requiring travel plans and transport assessments for proposals that are expected to generate significant increases in movement.

6.3 Reigate and Banstead Borough Local Plan (2005)

6.3.1 A number of policies in the Local Plan (2005) have been 'saved' and therefore continue to be used in the decision-making on planning applications. Those saved policies which are deemed to be relevant in the context of the proposed scheme are discussed further in the following paragraphs.



- 6.3.2 The Local Plan describes the site as the principle servicing eastern Surrey, especially from a retail standpoint where it is the Borough's intention that established town centre and local centres should continue to be the main focus for shopping provision and that their respective roles should be protected and enhanced wherever possible (paragraph 7.4). The proposals map identifies the site falling within the South East Quadrant and it is identified for primary retail development in order to achieve further expansion of Redhill's retail role. Policy RD3 and SH3 confirms such intentions for the area that the South East Quadrant is supported for further expansion in retail floorspace. Policy RD3 states that retail development should be complemented by provision of additional entertainment facilities.
- 6.3.3 The site also falls within an area identified as "integrated mixed use schemes" which requires development in the area to contain a mix of land uses and comprise a significant degree of planning benefit. Within these areas Policy RE 12 states that the provision for sporting, leisure and cultural facilities would be acceptable within these urban areas. The amplification of Policy RE 12 confirms that the Council will give encouragement, in appropriate locations, for cinemas.
- 6.3.4 The site falls within an area designated as a Town Centre Primary Shopping Area and is connected to Policy SH 1, which describes the general approach to town centre uses. The policy ensures that improved shopping provision is directed to the town centre shopping areas. Within these areas, the Council will encourage environmental improvements and a reduction in the conflict between pedestrians and vehicles. It is learnt within the points of amplification that preference will be given to schemes which meet identified deficiencies and which contribute to the enhancement of the shopping environment.
- 6.3.5 Within town centre shopping areas (Policy SH 3) additional retail floorspace will be provided as part of the integrated mixed use schemes.
- 6.3.6 Policy SH 5 states that within Town Centre Shopping the provision of Class A1 retail by way of new development will normally be permitted if:
- The proposal is of a size and type appropriate to the shopping centre;
 - The proposal would not unduly affect the viability of other shopping both within the shopping centre and in local shopping centres
 - The proposal complements the character of the area and would not have an adverse affect on the environment and amenities of the surrounding area



- Where appropriate, provision is made for existing firms and small scale activities;
- 6.3.7 Regarding housing, Policy HO 3 states that the provision of small dwelling units (i.e. one or two bedroom units) within or adjacent to town centres and other appropriate locations close to shops, public transport and other amenities where a higher density may be achieved.
- 6.3.8 Policy HO2 relates to affordable housing. Where a development exceeds 25 units, it states that an element of affordable housing will be expected taking into account the nature and characteristics of the site and its surroundings, the proximity of the site to local services and facilities and access to public transport, the particular costs associated with the development of the site, and also the specific housing needs within the area. The policy states that the proportion of social and low cost housing is to be secured on individual sites will be a matter for negotiation with the developers. The requirement is for an onsite provision, unless the Borough Council and the developer both consider it is preferable that a financial or other contribution be made towards the provision of the element of affordable housing on another site within the Borough.
- 6.3.9 Policy HO9 presents 12 criteria which all residential development will be required to satisfy in order to maintain and enhance the natural and built environment of the borough. Those of particular relevance to the proposed scheme are noted below:
- The development must be laid out and designed to make the best use of the site and its physical characteristics, views into and out of the site and aspect. Existing trees, vegetation, watercourse and other interesting features will be expected to be retained;
 - Promote or reinforce local distinctiveness;
 - The scale of development should not be detrimental to the character of the surrounding area. High rise development will not be permitted;
 - The layout and design should not seriously affect the amenities of adjoining properties;
 - Be designed to a high standard incorporating elevational treatments, roofscape and buildings materials and complement the character of the area;
 - Additional landscaping proposals will be required and should be considered at an early stage as an integral part of the overall design;
 - The environment created for the residents of the proposed development must be



satisfactory, in terms of outlook privacy and adequacy of garden space;

6.3.10 Policy HO 9A concerns the Council's policy on housing density and making the best use of land. It requires developers to avoid the inefficient use of land. It describes how residential development will only be permitted if proposals show that the principles of good layout and design have been taken into account (in accordance with HO 9). In addition, the policy requires a density of at least "50 dwellings per hectare" is to be achieved at locations with good public transport accessibility such as town centres.

6.3.11 Policy PC4 addresses tree protection and states the Council will protect, conserve and enhance the tree cover in the Borough through the use of development control powers.

6.3.12 Policy HO 10 relates to the Council's policy on noise and states that development will not normally be permitted in areas subject to noise and / or vibration unless measures are undertaken as part of such development to reduce to an acceptable level the effect of such noise and / or vibration upon the intended occupiers of such development.

6.3.13 In relation to the traffic, transport and movement, Policies MO4 – MO8 and MO10 are of relevance. Policy MO4 seek to ensure that proposals do not exacerbate transport problems or make conditions more hazardous for highway users. The County Highway Authority and Borough Council will ensure where appropriate that necessary improvements are designed, fully funded by the developer and completed to accommodate safely and traffic related to the development.

6.3.14 Regarding servicing provision within new development, Policy MO 6 normally requires provision for loading, unloading and turning of associated vehicles within the curtilage of the proposal. Where appropriate, such provision should be provided to the rear of the premises.

6.3.15 Policy MO 7 requires new development to provide parking in accordance with current adopted standards. The Development Plan states for most forms of market housing the general guideline should be as follows:

- 1.0 space per 1 bedroom dwelling;
- 1.5 space per 2 bedroom dwelling;
- 2.0 space per 3 bedroom dwelling;

6.3.16 In general, 5% of the parking spaces determined by the standard should be allocated for use by the disabled. Policy MO 8 seeks to secure provision and effective use of private and non-



residential parking space either for specified or general public use in order to supplement the Borough Council's own public provision.

7.0 Other Material Considerations

7.0 Draft Redhill Town Centre Area Action Plan (RTCAAP)

7.0.1 As previously identified, the Draft RTCAAP is a material consideration in planning decisions. It is the Council's intention that the main policies and remaining site allocations within the RTCAAP will be incorporated into the Development Management Plan. It therefore carries weight in the consideration of planning decisions. This is evident from the permission at the former liquid and envy site, opposite the site (LPA reference 14/00846/F), where the Officer considers the policies within the planning recommendation to Committee. Therefore, the document is key and provides an indication to the form and appropriateness of development within the town centre.

7.1 Strategic objectives for Redhill regeneration

7.1.1 The RTCAAP confirms that there is widespread support amongst RBBC Members and external partners for the Redhill Regeneration vision. As such, there are a number of strategic objectives which were agreed by the Redhill Regeneration Forum at its inaugural meeting in January 2011. These are as follows:

- To ensure that Redhill fulfils its potential as the main retail centre for Reigate and Banstead by providing additional comparison and convenience floor space which is of an appropriate scale and quality to diversify the town centre's retail offer;
- To secure Redhill's role as a commercial location of choice for a diverse range of occupiers;
- To provide the physical and social infrastructure facilities which will be required to accommodate the significant population and commercial growth planned for Redhill over the next decade.
- To develop, diversify and manage the evening economy in Redhill town centre, focusing on a family-friendly offer;
- To ensure that the redevelopment and regeneration of Redhill town centre creates demonstrable benefits for local residents;



- To improve the physical appearance of the town centre by tackling key “grot spots” which currently act as a magnet for crime or anti-social behaviour and create poor impression of Redhill for residents, commuters and potential inward investors; and
- To take proactive and coordinated steps to change the negative perceptions that people have of Redhill as a place in which to live, work and invest.

7.2 Key proposals

7.2.1 Key proposals contained within the RTCAAP which relate to the Marketfield site:

- Provision for at least 15,500 sq m of comparison shopping floorspace and 7000 sq m of convenience shopping floorspace within the town centre;
- The introduction of up to 3000 sq m of leisure and food and drink uses within the town centre;
- The development of at least 700 new homes;
- The creation of significant new jobs and training opportunities and provision for up to 7000 sq m of office / flexible small business
- The redevelopment of Marketfield Way with retail led mixed use scheme to include food and drink and leisure uses.

7.2.2 RTCAAP makes it clear that Marketfield (Allocation A) is the primary destinations in the town for retail-led mixed-use schemes.

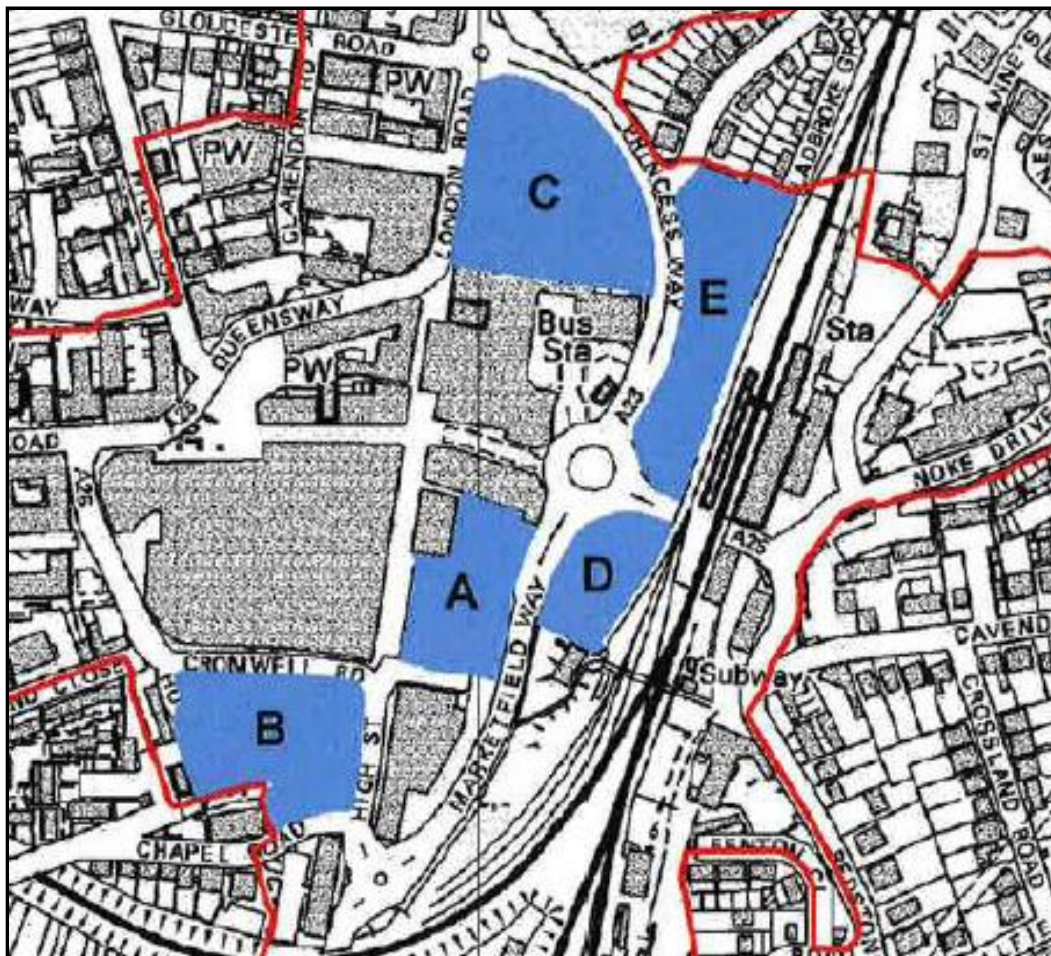


Figure 14: Area Action Plan Extract

7.2.3 The site is deemed to have the capacity to significantly deliver against the plan's objectives.

7.2.4 An indicative breakdown of Allocation A is as follows:

- 4,400 sq m (comparison A1);
- 3,510 sq m (Leisure mix of D2 (2,214 sq m) and A3 (1,296 sq m))
- 21 Residential Units;



7.3 Vision for Marketfield

7.3.1 The vision for Marketfield Way (Allocation A) is;

"High quality, mixed use, retail led regeneration scheme which, with a leisure anchor, will act as a catalyst to create a step change in the towns retail offer and transform Redhill's evening economy."

7.3.2 This will help to establish and secure the town's position as both a shopping and business destination of choice, as well as a desirable place to live. Overall, the Council's position is that Marketfield is to comprise retail led mixed-use scheme with the provision of food and drink and leisure uses.

7.3.3 At this current point, the RTCAAP identifies that the site does not make *"efficient use of its prime location and the shops which face the High Street do not meet the size requirements for major national retailers needed to secure Redhill's success"*.

7.3.4 The RTCAAP also confirms that the Borough is *"poorly served by cinemas"* and the evidence supports a requirement for extra facilities to service the local population. The Retail and Leisure Needs Assessment suggests that an additional facility should be directed to Redhill in the first instance.

7.3.5 The site is close to public transport and within the town centre and presents an opportunity to provide new homes to meet housing demand and targets in an accessible and sustainable location. The delivery of a leisure anchor, and associated quality food and drink outlets, will meet the proven need and provide a sufficient cluster to create an appropriate evening economy for Redhill.

7.3.6 The Area Action Plan identifies that specifically in Redhill there is a need for *"at least 700 new homes"*. There is also a requirement for the creation of significant new jobs and training opportunities and provision for up to 7000 sq m of office / flexible small business space.

7.3.7 Policy RTCA –A requires development on the Marketfield site in the form of new comparison retail which front the High Street and link to Marketfield Way, with complementary uses to include leisure and residential. The policy sets a number of criteria which the development is required to satisfy, those of particular relevance to the proposed scheme are repeated below:-



- Deliver new development which is of a high quality in urban design, architectural and environmental standards with strong building frontages onto High Street and Marketfield Way, with entrances and activity on both roads. The heights of the scheme should carefully consider those of neighbouring buildings and uses, add to the distinctiveness of the town centre and integrate well with both the existing centre and other planned developments;
- Contributes significantly to the retail offer, at least 4000 sq m containing a variety of retail spaces to suit a range of retail requirements;
- Be a mixed use development including significant amounts of leisure and quality food and drinks alongside residential uses;
- Provide revised access arrangements from Marketfield Road and new access arrangements from Marketfield Way together with appropriate provision for taxi / private hire vehicles, cycle and pedestrian access and drop-off / pick-up points;
- Make best endeavours to secure the re-provision or relocation of market storage facilities;
- Make best endeavours to secure the re-provision or relocation of businesses displaced by the development;
- Provide onsite storage of surface and flood water alongside incorporating flood resistant / resilient design features given the risk of localised flooding on the site;
- Provide on and off-site highway improvements;
- Include low provision of residents' car parking and include secure parking / storage;
- Make no provision for town centre parking;
- Provide affordable housing within any residential element as appropriate;
- Incorporate green infrastructure;
- Incorporate sustainable forms of construction, energy conservation measures and renewable energy where possible include opportunities for on-site energy generation

7.3.8 Policy RTC2-1 ensures that the town centre is the "*preferred location for retail proposals*". The primary shopping area and extension will be the acceptable location for large formats of retail provision. The policy requires active frontages within the primary shopping areas. It is noted that C3 on upper floors are seen as complementary uses.



7.3.9 Policy RTC2-2 (Improving the retail offer) sets out that provision will be made for approximately 19,400 sq m net additional comparison goods retail and 7,000 sq m net additional convenience goods retail floorspace. The provision of comparison retail floorspace is required in a high street format to preferably include a large anchor store alongside some major shop units of between 200 sq m and 500 sq m net. In addition, small store sizes are considered acceptable to meet the required demand. It is stated that a provision at Marketfield Way will be supported.

7.3.10 Policy RTC2-3 (Mix of uses in the Town Centre) states that the primary shopping area is to remain retail-led and the Council will resist changes of use which reduce the retail offer unless it can be demonstrated that the proposed mix would make a materially greater contribution to the vibrancy, vitality and viability of the town centre. The Council wishes to promote a vibrant mix of uses across the Town Centre and will afford greater flexibility for varied uses. The draft policy states further, provision is made for 3,000 sq m net additional leisure floorspace in the form of A3 uses. This is to be delivered in line with the area proposal for Marketfield Way.

7.3.11 Policy RTC2-5 relates to the promotion of sustainable travel. It is the Council's aim to offer town centre and railway users a better choice of more sustainable modes of transport by making the town centre more pedestrian and cycle-friendly. The policy comprises a number of objectives including the following pertinent objectives relating to the development:

- Improving walking routes through the introduction of a way finding initiative and the promotion of improved pedestrian links between the railway station, bus station and town centre.
- Enhancing cycling routes;
- Sustainable parking solutions with a balance between providing sufficient parking in appropriate locations, whilst encouraging greater use of public and non-motorised transport

7.3.12 With regards to car parking, the strategy in Redhill town centre is to create a balance between providing sufficient parking in appropriate locations, whilst encouraging greater use of public and non-motorised transport. The Draft Plan (Appendix B) advocates parking at 25 – 50% of the Borough Standard due to the highly accessible nature of the town. This equates to 0.25 spaces per one bed flat and 0.37 spaces per two bed flat.



- 7.3.13 The Council at Draft Policy RTC2-6 (Town Centre Living) sets out that there is a requirement of at least 700 additional residential units. Development within Redhill town centre should provide an element of residential on upper floors and where it does not conflict with the ground floor operation for main town centre uses. .
- 7.3.14 With regards to the type of housing that would be acceptable, Draft Policy RTC2-7 (Housing Type) states that across the town centre provision will be made for a mix of primarily 1 and 2 bedroom units to meet the defined need. All housing development proposals will be expected to provide affordable housing units in line with Core Strategy Policy CS14 Affordable Housing.
- 7.3.15 Policy RTC2 – 9 sets the high standard of design in new developments as the policy requires each development site to achieve high standards of architectural, urban and environmental design to enhance the image of Redhill town centre as a place in which people will want to live, work and visit. The urban design principles contained at Appendix A in the RTCAAP provides guidance on the matters that the Council will consider material in the assessment of the development.
- 7.3.16 Policy RTC2 – 11 concerns the promoting and enhancement of green infrastructure within Redhill and surrounding areas. This will be achieved by preserving, and where appropriate, enhancing, green infrastructure features. The Council will also encourage including green infrastructure (including Green Roofs) design into development proposals and will support links to the existing green infrastructure network.
- 7.3.17 Policy RTC – 12 relates to addressing the risk of flooding and development proposals at sites such as Marketfield Way car park are expected to be accompanied by a Flood Risk Assessment.
- 7.3.18 Policy RTC2 – 13 addresses air quality and states that proposals should take into account the impact of proposals and design choices on the levels of air pollution and will be required to provide innovative solutions that would not exacerbate the current levels of air pollution. Proposals are therefore required to submit air quality impact studies.

With regards to proposed heights in Redhill, the TCAAP states that the town centre benefits from being in a relatively low lying area in comparison to the raised residential hinterland. In line with this, the Council's position is that there is;



"Opportunity for taller buildings to be developed without significantly impacting on the views to or from the centre. In appropriate locations taller buildings could define the town centre and provide greater intensity of development in the location".

7.3.19 Appendix A under the Section "Urban Design Principles" states that "tall buildings" are buildings that stand out and are significantly higher than the surrounding buildings, and that recognisably change the skyline. Tall Buildings are deemed as positive additions to Redhill and they are considered to act as *"beacons of regeneration and stimulate further investment"*.

7.3.20 Within the town, tall buildings are thought to be 8+ storeys, the site itself is considered to be an area *"appropriate for tall buildings"*. We have provided an extract from the Area Action Plan at figure 5 to demonstrate the areas appropriate for tall buildings. As demonstrated, the areas in the shade of purple are designated the area where taller buildings are appropriate.

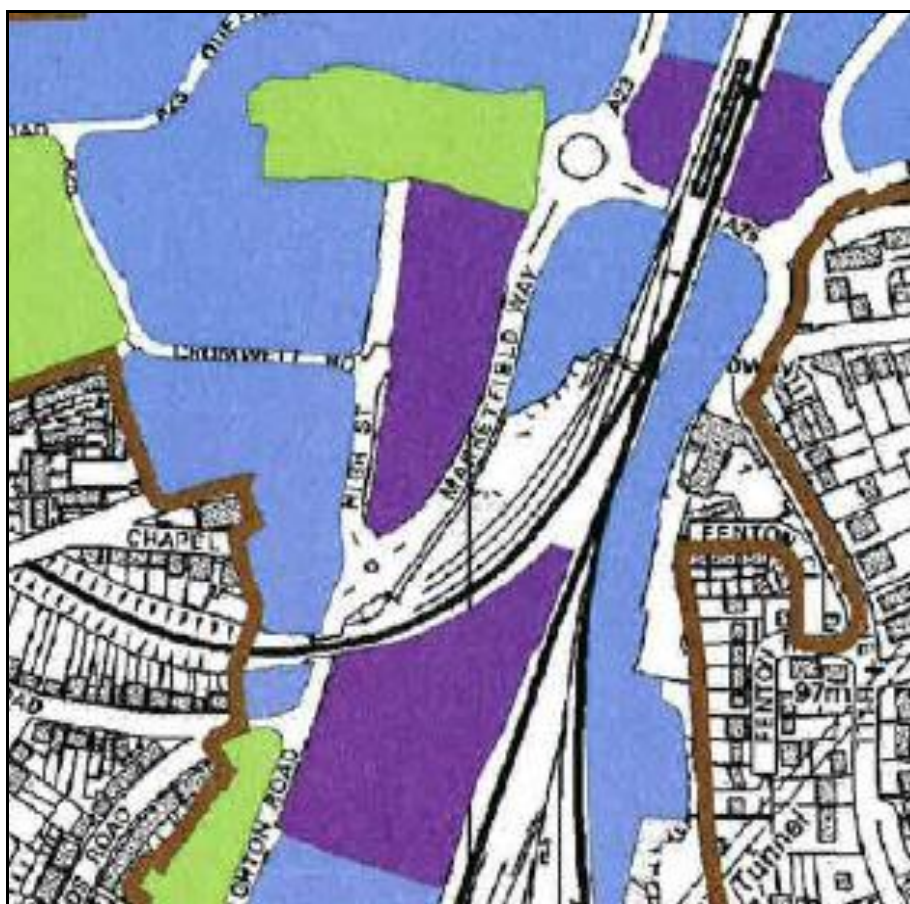


Figure 15: Area Action Plan: Tall Buildings Map Extract



7.4 Retail and Leisure Needs Assessment update (2011)

7.4.1 The Council's retail evidence (2011 Retail and Leisure Needs Assessment update) has identified the floorspace requirements for the Borough to maintain the existing spend within its area.

7.4.2 The evidence directs the majority of this need for delivery in Redhill town centre based on its regional role and priority for regeneration. Approximately 19,000 sq m of comparison retail floorspace and 7,000 sq m of convenience retail floorspace is required in Redhill town centre by 2027. Paragraph 19 states that the comparison element of the floorspace should be designed in a high street format to preferably include one larger anchor store alongside some major shop units (between 200 and 500 sqm).

7.4.3 In terms of leisure use in the town, the study found that;

"The Borough is currently poorly served by cinemas and the evidence supports a requirement for extra facilities to service the local population and due to the policy support for growth, we suggest an additional facility should be directed to Redhill in the first instance" (paragraph 21).

7.4.4 Paragraph 21 also identifies that there is a theoretical requirement for additional A3, A4 and A5 floorspace within the Borough, although most of it is expected to be provided alongside retail developments or potentially alongside a new cinema.

7.4.5 Redhill's food and drink offer is found to be *"adequate although there is some scope for improvement"* (Paragraph 13). The delivery of the identified retail floorspace need is essential for Redhill to raise its profile as a retail destination. Paragraph 21 states that there is scope for an improvement in the quality of the food and drink offer in Redhill and it is considered that the Council should encourage an improved evening economy offer in conjunction with its wider regeneration.

It is also noted that the provision of food and drink for shoppers during the day and in terms of the night-time economy falls short. Accordingly, the Study identifies the Marketfield car park as a location for development of enhanced retail and leisure development opportunities (Section 7.27).



7.5 Hyder Car Parking

7.5.1 In 2011 RBBC appointed a Study to evaluate the town's car parking capacity, which was carried out by Hyder. The study looked at the parking provision for the town centre areas as a whole concluding that there was an oversupply of car parking within the town centre even after car parking sites such as Marketfield were closed and redeveloped.

7.5.2 The closure of Marketfield was explicitly considered within this study and it assumes the following;

"There will be ample spare capacity to accommodate the lost parking as a result of the Marketfield Way redevelopment." (Section 7 of the Redhill Stage 2 Parking Matrix).

7.5.3 The Planning Policy team considers the results of the Study still to be reasonable from a planning perspective. However, the Study did not consider the effects of the various regeneration efforts in the town, namely the redevelopment of Sainsbury's and the Tran Station, which will increase the town public car parking provision. The redevelopment of Sainsbury's will provide a replacement 318 space public car park and a new 602 space foodstore car park. The redevelopment of the Train Station will provide a new 431 space commuter car park and a new foodstore car park comprising 193 spaces.

7.5.4 It is expected that the Sainsbury's car parks will be available from 2017.



8.0 Planning Considerations

8.0 Principle of Redevelopment

- 8.0.1 The application site is an existing town centre surface car park (Marketfield) with circa 1970's commercial buildings fronting onto the High Street in Redhill town centre. The development proposed will see redevelopment of the application site to provide a significant landmark mixed-use town centre scheme including; enhanced retail and leisure facilities with complementary town centre residential units. The proposals will significantly improve the town's retail and leisure offering comprising ten modern commercial units, attractive to a range of retailers and occupiers.
- 8.0.2 The mix of commercial units will be flexible, with retail, restaurant, cafe and assembly and leisure, (currently targeted for a gymnasium use). In addition to this commercial offer, the applicant is proposing a new six screen multiplex cinema and 153 residential apartments. Together these developments will add to the town's attractiveness as a destination as well as ensuring its continued vitality and viability.
- 8.0.3 The plans signal the positive steps being taken by the applicant to provide a safe and improved evening economy and these plans demonstrate that the Council is meeting the aims of sustainable planning, prescribed in the NPPF, through the creation of a place where people want to live, visit and work.
- 8.0.4 Allied to these proposals, the Council is actively pursuing the regeneration of Redhill to enable it to compete with neighbouring towns such as Reigate, Guildford, Crawley and Epsom. These regeneration efforts are signalled through the LPA's recent approvals of major schemes, not least demonstrated through the redevelopment of Sainsbury's Supermarket in the Warwick Quadrant (LPA reference 13/00168/S73).
- 8.0.5 It is intended that these development proposals will commence following completion of the supermarket's redevelopment. In policy terms, the site is allocated within the Draft Redhill Town Centre Area Action Plan (RTCAAP) for a mixed-use retail and residential development and the principle of development for the proposed uses is clearly acceptable. Acceptance of the suitability of the proposals is also noted from the LPA's Pre-Application advice letter received on the 29th of January 2016 (LPA: PAM/15/00448 refers).



- 8.0.6 In further support of the development proposals, the regeneration effort prescribed for Redhill is embedded within the Core Strategy. It is made clear in Policy CS 6 which identifies the town centre as a "*priority regeneration area*". It is apparent that the Council will look to approve plans that aid the town's regeneration efforts and provide significant inward growth and investment, supported by the NPPF's core planning principles.
- 8.0.7 The site is brownfield in nature with existing commercial and retail buildings. The NPPF prescribes a presumption in favour of redevelopment of brownfield sites, together with the promotion of mixed-use developments (core planning principles). At Paragraph 111 the NPPF contains a presumption in favour of the effective re-use of previously developed / brownfield land.
- 8.0.8 The site is not considered to be of "high environmental value". A request for a Screening Opinion from RBBC was made on the 29th of February 2016 and the Council confirmed that the site was not located within a "sensitive area" and that the proposals would not have a "significant effect on the environment". Accordingly, the Council provided their view that a statutory Environment Impact Assessment for the proposed redevelopment of the Marketfield site would not be required. The proposals will make effective and efficient re-use of the town centre site with a mixed-use development demonstrating compliance to the NPPF's core planning principles.
- 8.0.9 It is also stated at Paragraph 9 in the NPPF that the pursuit of sustainable development involves the seeking of positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life. Such examples include making it easier for jobs to be created in cities, towns and villages, improving the conditions in which people live, work and travel and take leisure and widening the choice of high quality homes. Such benefits are a feature of the proposed development.
- 8.0.10 The proposed development will meet the strategic objectives contained within the Draft Redhill Town Centre Action Plan (RTCAAP), for example; the proposals will provide new retail, leisure and housing that will help to ensure that Redhill fulfils its role as the main retail centre for Reigate and Banstead and the plans now submitted will develop and diversify the town's evening economy, providing family friendly uses. The proposals contain demonstrable benefits and therefore support the aims of the RTCAAP.
- 8.0.11 The application site is within one of the Borough's Primary Shopping Area, where enhanced retail activity is clearly promoted. The site is also within the Borough's Integrated Mixed Use



areas and as such the proposals are in line with the planning designations. In addition to this, the RTCAAP identifies the site as a *"majority opportunity site"* with Policy RTC1 – A, stating that there is opportunity to accommodate at least 4,000 sq m of additional retail floorspace onsite and *"significant amounts of leisure and quality food and drink alongside residential uses"*. The policy includes an indicative breakdown which identifies 3,510 sq m of leisure floorspace including; 2,214 sq m of Class D2. The proposals hereby submitted meet this requirement.

8.0.12 The proposals seek to remove the existing parade of poor quality buildings on the High Street. The proposals will provide additional provision of modern, high quality retail floorspace and this supports the aims of Core Strategy Policy CS 6 in seeking improved multi-purpose town centres. The policy states that the majority of retail growth to meet the strategic needs of the Borough should be directed to Redhill town centre. The policy makes it clear that Redhill is to be the prime focus for large scale leisure and retail developments.

8.0.13 The developments proposals will also support the NPPF's requirement to seek developments in town's centres that promote both the vitality and viability of the centre. In addition, the RTCAAP identifies that the site does not make *"efficient use of its prime location and the shops which face the High Street do not meet the size requirements for major national retailers needed to secure Redhill's success"*. It is on that basis, that we consider the demolition and redevelopment of the site with a comprehensive town centre offer should be fully supported by the Council. At this juncture, the applicant is in the process of securing deals with major national retailers, which will help to support the Council's vision.

8.0.14 The pre-application consultation also demonstrates that the scheme is being met favourably by both the LPA and general public. We carried out two major public exhibitions on the 9th and 12th of March 2016 in Redhill town centre. It was clear that the scheme was welcomed by the community with 96% of respondents supporting the applicant's vision of a new town centre retail and leisure offer. Therefore, it is clear that the benefits of the proposed development weigh significantly in its favour and policies in the NPPF indicate that the development should not be restricted in this case. It is the clear position that the redevelopment proposals are acceptable, in principle.



8.1 Retail and Leisure Use

8.1.1 The site of the proposed development lies within the defined town centre, where planning policy offers significant support to the proposals, as the underlying objectives of the NPPF and the development plan is to support and enhance town centres. The NPPF's retail policy is dealt within paragraph 24 to 29, which states that development plan policies should be positive and promote competitive town centre environments. In the context of this planning application, a relevant consideration is the following:

"Promote competitive town centres that provide customer choice and a diverse retail offer and which reflects the individuality of town centres".

8.1.2 It is considered that the proposals accord with the spirit of the NPPF in seeking to ensure that town centres are at the heart of their communities and also that development plan policies should ensure their viability and vitality. The RTCAAP identifies that the site is allocated for a mixed-use retail and residential development and therefore the proposed scheme is acceptable.

8.1.3 The development proposal comprises ten flexible units which will be located at ground and first floors. The flexible use will amount to an additional 6,523 sq m (GEA) of town centre uses which will be implemented as either Class A1 retail, Class A3 restaurant and cafe or Class D2 assembly and leisure.

8.1.4 The application site falls within Redhill's prime retail area where enhanced retail activity is clearly promoted. The RTCAAP seeks to promote the site for a comparison, retail-led mixed-use scheme, incorporating leisure and other complementary uses such as residential. The RTCAAP envisages that the site will bring forward regeneration benefits to the town.

8.1.5 The vision for Marketfield Way contained within the RTCAAP is for a;

"High quality, mixed use, retail led regeneration scheme which, with a leisure anchor, will act as a catalyst to create a step change in the towns retail offer and transform Redhill's evening economy".

8.1.6 The RTCAAP includes a provision of at least 4,000 sq m retail along with significant amounts of leisure. Accordingly, the development proposals comply with the Council's retail and leisure policy.



- 8.1.7 Despite the proposals involving the removal of the existing parade of buildings fronting the High Street, the redevelopment would enhance the town's offer and provide surplus town centre uses. The RTCAAP acknowledges that the site does not make "*efficient use of its prime location and the shops which face the High Street do not meet the size requirements for major national retailers needed to secure Redhill's success*". It is on that basis that the initial temporary loss of retail, during redevelopment, is necessary to support the Council's overarching aims of regeneration.
- 8.1.8 In correlation with the RTCAAP, the Core Strategy sets out that Redhill should have an enhanced and improved retail offer so that it can compete more effectively with some of the larger centres in the area, not only in terms of convenience provision, but also comparison shopping (Core Strategy Policy CS7). Policy RTC2 – 1 confirms that the town centre is the "*preferred location for retail proposals*" and identifies the acceptability of the proposals through the provision of enhanced town centre uses within the primary shopping area. The policy requires active frontages and notes the acceptability of Class C3 on upper floors. The proposals hereby submitted form compliance to this draft policy.
- 8.1.9 Saved policy SH1 provides further clarification into the acceptability of these proposals as it seeks to improve the shopping provision within the town centre, with amplification to the policy stating that there remains an identified deficiency within Redhill town centre. Allied to this, the Retail and Leisure Needs Update (2011) identifies that an additional 25,800 sqm of comparison floorspace can be accommodated together with some 11,700 sqm of convenience floorspace. The evidence directs most of this need for delivery in Redhill town centre, based on its regional role.
- 8.1.10 Moreover, the Study found that "*the Borough is currently poorly served by cinemas*" and the evidence supports a requirement for extra facilities to service the local population, it is suggested that the facility should be directed to Redhill in the first instance.
- 8.1.11 The study also notes a theoretical requirement for additional A3 provision as well as A4 and A5. The study affirms that the food and drink offer is found to be "*adequate although there is some scope for improvement*" (Paragraph 13).
- 8.1.12 The delivery of the identified flexible commercial floorspace is essential for Redhill to raise its profile as a retail destination. Paragraph 21 states that there is scope for an improvement in the quality of the food and drink offer in Redhill and it is considered that the Council should



encourage an improved evening economy in conjunction with its regeneration. The study also identifies Marketfield Car Park as the appropriate location to direct new provisions.

8.1.13 Therefore, it is the case that the town centre offer within the development proposal will support the findings within the Retail and Leisure Study and it will also support policy RTC2 – 3 which requires a mix of uses which contribute to the vibrancy, vitality and viability of the town centre.

8.1.14 Overall, it is clear that the proposal will provide substantial benefits to the town centre and wider borough alike, as well as to residents and visitors using the town. We consider that this proposal is fully compliant with national and local policy as it will significantly improve the vitality and viability of Redhill town centre. There is no planning reason why the retail and leisure elements of the scheme should raise objection.

8.2 Residential

8.2.1 The mixed-use redevelopment of the Marketfield Road site, including residential apartments, is consistent with planning policy and will help to meet the Council’s housing and town centre aspirations, on this highly sustainable brownfield site.

8.2.2 The proposed residential units will sit above the flexible commercial units and will support the aims of Policy RTC2- 1, achieving the provision of a diverse set of uses. The housing will help contribute to the Council’s regeneration efforts through the creation of a place where people would want to live, work and visit as prescribed by the NPPF. The housing provision will support the aims of the Core Strategy, as Policy CS7 seeks to ensure that town centres maintain their multi-purpose role.

8.2.3 The provision of housing will make a meaningful contribution to the Borough’s housing targets. Core Strategy CS13 requires that 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"*. In line with making efficient use of land, as prescribed by the NPPF, the policy requires at least 5,800 homes within existing urban areas, such as Redhill town centre. The development proposals are therefore in line with this policy context.

8.2.4 In addition, the principle of housing provision within the town centre is supported through Draft Policy RTC2- 6 which sets out a requirement of *"at least 700 additional residential*



units". In further support, Policy RTC1 –A supports directing housing provision to the Marketfield Way site.

- 8.2.5 The applicant is set to provide a mix of one and two bedroom apartments, consistent with Saved Policy HO3, which states that the provision of smaller dwelling is appropriate for town centre locations, where there are excellent transport connections.
- 8.2.6 The housing provision is therefore also supportive of Core Strategy Policy CS17, which encourages development to be located in accessible locations.
- 8.2.7 The development sits in a prominent and highly accessible location, adjacent to major transport hubs at the train and bus stations. In planning policy terms, the accessible location supports the proposed density of the scheme. The scheme will deliver a density equating to 259 dwellings per hectare and this is in line with Saved Policy HO9A.
- 8.2.8 Moreover, the proposed density and mix of units is in line with some of the recent residential consents seen in the town. The LPA's recent permission at the former Liquid and Envy Nightclub under LPA reference 14/00864 approved a scheme of 36 one bedroom and 40 two bedroom units across 8 storeys, equating to 195 dwellings per hectare.
- 8.2.9 A full Financial Viability Assessment (FVA) has been prepared and concludes that it is not viable to provide affordable housing within the scheme. National policy states that there is flexibility in the provision of affordable housing if it makes redevelopment schemes unviable. In this case, the scheme proposed delivers positive regeneration of a difficult town centre site.
- 8.2.10 The Financial Viability Assessment tests both a discounted sale model and a Private Rented Sector model. The results of both tests are similar and neither option would result in a scheme that could support the provision of affordable housing. Therefore, in planning terms the lack of affordable provision as part of the scheme is acceptable and in line with Core Strategy Policy CS15 and the NPPF.

8.3 Transport

- 8.3.1 Planning policy ensures that Council's reduce the need to travel by approving development in "*accessible locations*" (Core Strategy, Policy CS17). The aim of the policy is to improve efficiency of the transport network and facilitate sustainable transport choices, which can be



achieved partly by requiring travel plans and transport assessments for proposals that are expected to generate significant increases in movement.

8.3.2 The planning application is accompanied by both a Transport Assessment and Travel Plan. These accompanying studies fulfil the requirement of planning policy as they examine the existing transport position of the site and town and evaluate the impact of the proposed development on the surrounding network.

8.3.3 The Transport Assessment also considers whether any mitigation measures are needed to reduce the impact of the development on the transport infrastructure. The Travel Plan sets out the traffic management procedures for the site. There are two principle strands to this; (1) managing of servicing, (2) promotion of sustainable travel modes by staff and residents. Therefore, the proposal is in line with the development plan.

8.3.4 Similar to the Core Strategy, Saved Local Plan Policy MO4 seeks to ensure that proposals do not exacerbate transport problems or make conditions more hazardous for highway users. The Transport Assessment provides an examination of the transport impacts, based on 154 residential units, a six screen cinema and 6,426 sq m of additional Class A1 and A3 retail. The Assessment notes how the proposed development is located within the town centre where the existing transport infrastructure is good.

8.3.5 Redhill railway station is located within 100m of the northeast corner of the site and Redhill bus station is located opposite the railway station. The train station is noted to be a major interchange between the Brighton Main Line, North Downs Line and the Redhill to Tonbridge Line. The Brighton Line also runs from London (either London Bridge or Victoria) to the north and to Gatwick and Brighton to the south. It is therefore the clear position that the proposed development is located within a highly accessible and sustainable location and the uses will be supported by good transport links, in compliance with the development plan.

8.3.6 The Study also calculates the trip generation of the various components in the scheme. With regards to the trip generation from the residential element, it shows that in absolute terms the traffic generation of the proposal is very low. In total only circa 6 – 8 two way peak hour movements are forecast from the site access point. This equates to just 1 vehicle every 8 – 10 minutes. It can be concluded therefore that the proposed development would not adversely impact the existing transport network and can be considered in line with Saved Policy MO4 and Core Strategy Policy CS16.



- 8.3.7 In terms of the retail and leisure element, the Assessment considers that the trips will be linked with existing visits to the town centre, rather than creating new trips. The assessment considers that the parking demand for both retail and leisure uses could be accommodated off site in existing car parks. It is the policy of Surrey County Council to discourage dedicated car parking for new retail and leisure development.
- 8.3.8 Overall, it is found that there would be an increase in car trips on the surrounding road network, but that this increase is well below the level that could give rise to any adverse operational issues. Together, the proposed development will only add around 60 – 70 vehicles per hour to the local road network and these will be dispersed around the existing town centre parking provision. On this basis the development will not result in any adverse impact on the wider network.
- 8.3.9 Together the Travel Plan and Transport Assessment all point towards the promotion of sustainable transport choices, encouraging walking, cycling and use of public transport. This is in compliance with Saved Policy M04 and Core Strategy Policy CS16.

8.4 Parking

- 8.4.1 The development proposals will see redevelopment of the existing 97 space surface car park. It was noted during the consultation period that the loss of town centre car parking was a concern for the public as it is expected that visitors travelling by car to the site will have to use publicly available parking within and around the Town Centre, not including the 97 at Marketfield Way.
- 8.4.2 The Council has considered this previously and has commissioned a car parking study which was prepared by Hyder in 2011. This study examined the parking provision for the town centre areas as a whole and concluded that there was an oversupply of car parking within the town, even if car parking sites, such as Marketfield Way, were closed and redeveloped.
- 8.4.3 The application site was specifically assessed as part of the Study and it concludes the following;

"There will be ample spare capacity to accommodate the lost parking as a result of the Marketfield Way redevelopment" (Section 7 of Redhill Stage 2 Parking Matrix).



- 8.4.4 The results of the Study are still considered reasonable from a planning policy perspective. Moreover, the Study did not pick up the actual increase in car parking in the town through the redevelopment of both the Sainsbury's (LPA ref: 13/00168/S73) and the Train Station (LPA ref: 13/00848/F). It has been calculated that both the Sainsbury's and the Train Station will increase car parking in the town by 818 spaces.
- 8.4.5 The Sainsbury's car parks are expected to become available from 2017, which will provide a well timed transition from the loss of 97 space, experienced as a result of the redevelopment of Marketfield car park. It is therefore the considered opinion that the redevelopment of the car park would not exacerbate problems in the town and that the plans are in compliance with Core Strategy CS17 and Saved Policy MO4.
- 8.4.6 With regards to the new onsite provision, the residential parking will be provided at basement level and will comprise 47 spaces, which is equivalent to a ratio of 0.3 per flat. It is noted how this provision is in line with the RTCAAP which advocates parking at 25% - 50% of the Borough Standard due to the highly accessible nature of the town. This equates to 0.25 spaces per one bed flat and 0.37 spaces per two bed flat.
- 8.4.7 The first pre-application response (LPA ref: PAM/15/00448 – appendix B) also supports the provision, due to the sustainable location and the town's good public transport links and existing public car parking opportunities. Therefore, the LPA had no objections to the car parking position. It is the case therefore that the car parking provision is in line with the Council's development plan and is acceptable.

8.5 Heritage and Archaeology

- 8.5.1 The Boundary of the Conservation Area was drawn in 2013 and the Committee Report approving consultation on the boundary confirms that it is only the facades of the commercial premises that are suitable for retention, with higher density development and unified plots behind the facade.
- 8.5.2 The planning application proposes to redevelop the existing unsightly surface car park with a high quality landmark town centre scheme. At present the bare nature of the car park reveals from Marketfield Way the rear facades of the buildings along Station Road and the High Street. The rear of these buildings have been extended and altered over the years and have affected the value and appearance of the streetscene along Marketfield Way.

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- 8.5.3 Notwithstanding the poor quality of the rear facades, as seen from the photo at Figure 16, the town centre area has recently been designated as a Conservation Area. It is important to note that Marketfield Car Park and the commercial buildings within the application site are excluded from the Conservation Area.
- 8.5.4 The designation of the Town Centre Conservation Area was principally formed to protect the town's Victorian Core and to protect the principal facades along Station Road. The ground floor on the buildings along Station Road comprises modern retail frontages which neither protect nor enhance the quality of the principal facades.
- 8.5.5 It is noted from the Consultation Committee Report regarding the town centre conservation area that a key consideration in setting the boundary was to exclude Marketfield Way Car Park in order to "avoid impact upon the potential for redevelopment of Marketfield Way" (Para 4.2). It is the case therefore that the recent town centre conservation area should not preclude development coming forward on the application site, as this will affect the town's overarching regeneration objectives.



Figure 16: Rear of Station Road



8.5.6 In consideration of harm to the town centre conservation area the NPPF provides some context. The NPPF sets out that any harm or loss, of significance of a designated heritage asset should require clear and convincing justification (paragraph 132).

8.5.7 It is the considered opinion that these proposals will not involve any loss of significance to the asset as the redevelopment of the Marketfield car park will conceal the unsightly appearance of the rear facades of the buildings along Station Road and the High Street. Rather it is the case that the redevelopment of the site will enhance the area through an attractive and landmark high quality scheme. Therefore it is considered that the scheme complies with paragraph 132 of the NPPF and Core Strategy Policy CS4 as a consideration into the enhancement of the town's heritage asset.

8.5.8 It is the considered opinion that the redevelopment of Marketfield car park will provide a range of improvements to the town. Such improvements not only relate to aesthetic improvements, but also generating an improved retail and leisure offer, facilitating the towns vibrancy and vitality for years to come. The scheme will improve the town's evening economy and fulfil the Council's overarching regeneration objectives. It is for these reasons that the redevelopment and regeneration of the town, through these proposals, should be supported.

8.5.9 The accompanying heritage and archaeological desk-based assessment states that the town centre is an area of high archaeological potential. However, it confirms that there are no assets recorded within the development site. The report does recommend that an archaeological watching brief is undertaken during the initial topsoil strip during the construction. Undertaking the archaeological watching brief during the initial construction phase will allow any archaeological features to be recorded.

8.6 Design, Height and Layout

8.6.1 Care has been taken to design the scheme in a way that is sensitive to the surrounding area. The proposals are considered to comply with the design related policy objectives set out in the NPPF and Borough's development plan and the RTCAAP.

8.6.2 As demonstrated in the accompanying Design and Access Statement and drawings, the proposal optimises the potential of the site to accommodate development whilst adhering to the rhythm of development in the town, respecting the surrounding buildings. The design is considered to be pedestrian led and supports Core Strategy Policy CS4 as its appearance reflects the existing character and local distinctiveness of the town. This is evidenced through



the typical bay of the facade along the west of building matching the geometry and scale of the proportions of Marylebone House.

- 8.6.3 The key detailing and Victorian craft of Marylebone House is transferred to the proposed scheme to reinforce the local distinctiveness, thus complying with Saved Policy HO9. The western block will relate with its surrounding buildings and will mediate between the scale of Kingsgate House and Marylebone House by stepping down from south to north, which will comply with Core Strategy Policy CS4 by sitting comfortably within the town.
- 8.6.4 The design has evolved through discussions with the Local Planning Authority and a positive response has been provided to all points raised. This has culminated in the scheme now submitted, which ensure a high quality environment for residents and visitors into the town.
- 8.6.5 Redbrick is the principal material used for construction within the town. Notwithstanding its prominence, it was advised within the pre-application advice letter issued by Major Development's Officer (Andrew Benson) that its overuse would be *"discouraged in favour of a more varied brick type"* (Full pre-application advice letter is available at Appendix B). The scheme has successfully complied with the Case Officer's recommendation and it will implement a robust and varied pallet of materials.
- 8.6.6 In adhering to the local vernacular, the scheme will reduce the amount of redbrick throughout the scheme. For example, the tall landmark building (east building) adopts a lighter brick cladding which adds vibrancy and freshness to schemes appearance. The cinema is proposed to be constructed in copper / brass coloured metal rainscreen panels. Together these components of the development proposals will add key variation and provide subtle differences to the red brick on the proposed High Street elevation.
- 8.6.7 In designing the cinema, the architects had to ensure that it did not appear as a *"big blank box within the middle of the town centre"*. This was also noted from Andrew Benson's pre-application advice letter.
- 8.6.8 As such, the architect's have successfully broken up the facade through the inclusion of large glazed openings at opposite ends of the cinema structure and through a series of punched opening across the facade, which is inspired by the slots of a zoetrope. It is intended that the series of openings will draw the eye from the signage, horizontally along the building towards the cinema entrance.



- 8.6.9 The selected material will add an aesthetically pleasing texture and pattern to the cinema and together with the series of glazed openings will avoid it appearing dull and blank.
- 8.6.10 The proposals seek to build scale toward the southern end of the site. This would be to create a key landmark feature of the buildings to the entrance of Redhill from the south, via Brighton Road. The pre-application process has supported this process, with the Case Officer supporting the general massing and design of the scheme.
- 8.6.11 The buildings at the southern limit of the site would range from 8 to 12 storeys. The tallest element of the scheme would be located at the south eastern corner and this will only be 4 storeys taller than the existing highest building at the Red Central and Kingsgate House development. The proposals would make the best possible use of the site and its physical characteristics. The town centre benefits from being in a relatively low lying area in comparison to the raised residential hinterland and as a result the buildings of the scale proposed would not have a significant impact on distant views. This is confirmed through the accompanying Townscape and Visual Impact Assessment which notes how the new buildings will create a high quality and positive addition to the skyline.
- 8.6.12 In line with this, the RTCAAP states that there is *"opportunity for taller buildings to be developed without significantly impacting on the views to or from the centre. In appropriate locations taller buildings could define the town centre and provide greater intensity of development in the location"*. The site itself lies within an area noted to be *"appropriate for tall building"*. On that basis, the proposed height and massing is considered to be acceptable and in compliance to planning policy.
- 8.6.13 The development proposals would result in elegant larger buildings on site. The external appearance of the resultant buildings would be very different; however, it would use a simple pallet of red brick, lighter brick, metal rainscreen panels and modern cladding with glazing. This is intended to reflect the Victorian buildings that back into the site. The submitted typical bay section, demonstrates how the new units would reflect the existing rhythm of the high street. The development, in addition to being a landmark feature, would read as a seamless town centre addition.
- 8.6.14 Overall, the design would enhance the currently poor visual impression of the site and would create activity at ground floor level. It is considered that the new public realm area would be a key feature of the development and provide clear linkages from the site to the train station and the wider town centre offer. The southern end of Redhill town centre (including the



application site) needs to be reinvigorated further, in line with the Visions contained within the RTCAAP. The scheme would redevelop the unattractive parade of units along the High Street, which are noted within the Area Action Plan as not being attractive for take up by modern national retailers. It is the considered opinion that the design, appearance and scale of development is acceptable

8.7 Townscape Impact

8.7.1 A Townscape and Visual Impact Appraisal has been produced by WYG, following the methodology of the Landscape and Visual Assessment 3rd Edition published by the Landscape Institute and the Institute of Environmental Management & Assessment in 2013. Existing townscape conditions have been assessed and any sensitivities in the existing townscape are discussed therein.

8.7.2 The visual impacts of the proposed scheme have been assessed and categorised, and then identified as either beneficial or adverse. The Townscape and Visual Assessment notes how the form of development is welcomed because it provides a high quality, mixed use scheme in replacement of an unattractive town centre surface car park. The report affirms that the proposed scheme makes practical use of existing street pattern, built form and responds positively by providing a range of buildings utilising materials reflective of the local vernacular, but in a contemporary style.

8.7.3 The assessment considers the height of the proposed scheme to be sympathetic to the existing context, with the stepping of new building heights, relating to the range of existing building heights around the site. It also acknowledges that the taller buildings will become a wayfinding device for visitors to Redhill. It states that the new buildings will be tall and prominent, but of high quality and a positive addition to the skyline of Redhill.

8.7.4 It is acknowledged that the development will create new active frontage along Marketfield Way, reducing the utilitarian character of the road corridor and link the shopping precincts on the High Street and the station, making it a highly connected and integrated town centre scheme.

8.7.5 The Assessment follows on from the pre-application discussions with RBBC Major Development's Case Office, Andrew Benson, who advised that the views into the town would be important. Allied to this, it was requested that the applicant assess the relationship of the development from a range of agreed viewpoints, these were as follows;





- From Brighton Road to the south (at approximately the Junction at Hooley Lane)
- From Brighton Road to the north (at approximately the junction with Frenches Road);
- From the Station / A25 roundabout;

8.7.6 The TVIA considers these views with photorealistic images in order to satisfy the requirements of the Council's pre-application response. In addition, a number of images closer to the development have been assessed and considered therein.

Junction of Brighton Road / A23 / Hooley Lane to south of site

8.7.7 The elevated position of this location allows filtered views towards the town centre along Brighton Road, the principle road link into the town from the south. Kingsgate building forms the wayfinding marker at the south of the town centre.

8.7.8 The North Downs are visible on the horizon. The photoview and assessment reveals that the new East building would be visible above Kingsgate building and would form part of a cluster of buildings within the town centre (refer to figure 17 overleaf).

8.7.9 It is considered that the magnitude of change would be small. The receptors in the area would experience a minor adverse change in view with the East building being added to the existing cluster of buildings visible as part of the town centre skyline.

8.7.10 The height of the East Building will make it the tallest building in the view as it rises above the North Downs ridge that forms the background to the view in the distance beyond the town, which will result in the effect remaining as minor adverse over time.



Figure 17: Proposed view from Brighton Road, Junction with Hooley Lane

Junction of London Road / A23 / Frenches Road to the north of the site

8.7.11 The elevated position allows filtered views towards the town centre along London Road, the principle road link into the town from the north. It is stated that the impact of this view over time would become "*minor to negligible*". However there would be some small magnitude change during the construction period. (Refer to figure 18).





Figure 18: Views from Brighton Road, Junction with Frenches Road

Key views of Station Roundabout

8.7.12 From this view it is considered that there would be a small magnitude of change during the construction period of the development. For road users and pedestrians the effect would be minor adverse on completion due to the upper storeys of the new development forming part of a screened view of the town centre skyline, albeit this view would only be of short duration. As the new built form becomes established over time its effect would become minor adverse to negligible.



Figure 19: Proposed view from Station Roundabout

8.7.13 Overall, the Assessment concludes that the development will have an effect on views around the site with those most affected being within close proximity of the site. Those closer to the site would experience a minor to moderate beneficial effect in views as the current view towards a utilitarian car park with little character is upgraded to a range of high quality new buildings.

8.7.14 Views from further afield will also be altered, with the new development becoming a component of the existing skyline of the town centre. The height of the east building will result in it becoming the tallest building on the skyline, which due to the raised viewing positions will become prominent above the horizon line.



8.8 Sustainability and Energy

8.8.1 The Application is submitted with an Energy Assessment which considers the approach to energy provision and use at the site. The Assessment complies with the energy hierarchy, incorporating energy efficiency into the design, in addition to the application of low carbon technologies, in line with best practice and government guidance.

8.8.2 In line with Planning Policy (Core Strategy CS10 and CS11), the report demonstrates that on site renewable technology has been considered and assessed, and the accompanying Energy Report looks in turn at the various technologies available. It is recommended that the development should make use of Air Source Heat Pumps for the commercial units, as this has been found to be the most efficient way to meet the heating and cooling demands.

8.8.3 For the residential element, the Energy Strategy includes connection to an existing Combined Cooling Heating and Power distribution network and a central CHP plant for base heating and hot water demand. The CHP system is noted to be the most suitable method to serve the residential heating and hot water requirements.

8.8.4 Overall, the energy strategy therefore comprises the following:

- Passive Design and Energy Efficient measures;
- A CHP system has been specified to serve the base heating and hot water demand for the residential units;
- Air Source Heat Pumps have been specified to serve the heating and cooling demand in the commercial units.

8.8.5 The results of energy modelling confirm development sustainability features that will reduce the CO₂ emissions of the development by 12.14% and the energy consumption by 10.39% (143,252.96 kWhr/annum saving) from a base Part L 2013 compliant build, in conjunction with local planning policy.

8.8.6 The use of further / emerging technologies may be included for use within this development if their feasibility increases in the future, in accordance with best practice. The proposed energy strategy is therefore in accordance to Core Strategy Policy CS11.

8.8.7 Furthermore, Cudd Bentley Consulting has been commissioned to assess those measures included to achieve a BREEAM rating of 'Very Good' in line with planning policy. The



accompanying report demonstrates that the development would achieve a rating of 58.83% (Very Good). Therefore, the proposed development forms further compliance to Core Strategy Policy CS11.

8.8.8 The planning application has been submitted with a Sustainability Statement and this considers how the proposed development impacts on a range of sustainability features such as Water Consumption, Transport, Construction Site Management, Sustainable Design, Flood Risk, Noise and Ecology.

8.8.9 In terms of ecology, the Phase 1 Ecology Report states that the site is of low or negligible ecology value. The Ecology Report puts forward a range of recommendations for enhancing the site, with such measures including green or brown roofs.

8.8.10 The Sustainability Report acknowledges that should these recommendations be included within the design, the proposal may be deemed sustainable with regard to ecology matters.

8.8.11 The Sustainability Report confirms that the development shall include a variety of features which are regarded as having sustainable design. Any external lighting specified will be designed to reduce unnecessary light pollution, to be achieved through the use of time switches or daylight sensors which switch off lighting between 2300hrs and 0700hrs as well as cut off luminaires which reduce light spill into neighbouring properties.

8.8.12 Overall, the sustainability features noted within the accompanying Sustainability Statement will help achieve a sustainable development in line with Core Strategy Policy CS10 and CS11.

8.9 Climate Change Mitigation Measures

8.9.1 The planning application is supported by a Flood Risk Assessment (FRA) and a Foul and Surface Water Drainage Strategy.

8.9.2 The applicant has taken the necessary steps to engage with the EA prior to the submission of the planning application. This included paying the pre-application fee for the EA to engage in the process. To this date, the applicant has still not received up to date modelling data from the EA (Paragraph 3.3 of the FRA refers to our engagement to date). The best available modelling data is the flood map and level data provided in 2013.

8.9.3 The FRA confirms that the whole site lies within flood zone 2 for fluvial risk and flood zone 3 with regards to surface water risk. The site currently drained by a combination of private and



adopted sewers. There is no evidence of any onsite attenuation and hence the site has an effective unrestricted runoff.

- 8.9.4 The Redhill Brook flows to the west of the site in a culvert. The risk of flooding from the Redhill Brook is shown to be mainly upstream and downstream of this location. The railway line is noted to provide protection to Marketfield Road site and lessens the impact of fluvial flooding onsite. As a result, no flood compensation is proposed. The risk of surface water flooding has been reduced onsite and offsite by reducing the runoff rate to the receiving system and storing water on site.
- 8.9.5 The FRA advises that the development area will remain 100% impermeable although the green / brown roof system will reduce the flow of water and increase the time concentration for outflow event in larger scale events. It is advised that the basement car park would be at risk of inundation from flooding if left unprotected. The residential dwellings are noted to be above the flood levels. Preliminary calculations show that to reduce the outflow from the development to the Greenfield runoff rate would require 604 m³ of storage in a design 1 in 100 year plus 40% climate change event. This storage is proposed below the ground floor slab in a crate style tank, as shown in Appendix B of the FRA.
- 8.9.6 The FRA states that there may be mitigation measures to manage the risk of flooding within the new development. For instances, it is proposed to provide self-raising flood barriers on all entrances to the buildings and the basement car park. The exact form of the barriers will be agreed at the detail design stage, however, the FRA does provide an example. These barriers will be proposed to protect the building up to 600mm above the 75.8 AOD flood level, giving a crest of 76.4m AOD.
- 8.9.7 In addition to the proposed barriers, the basement will be provided with a monitoring system to restrict access if the barriers have been deployed to avoid the potential for pedestrian access from within the development when there remains a potential for the basement to be inundated.
- 8.9.8 All the businesses and residents in addition to the site management will be registered for flood warnings with the EA. These warnings will form the triggers for actions within the Flood Warning and Evacuation Plan which will in the case of a flood event of sufficient scale reach the site result in the planning evacuation of the development as a whole.



8.10 Daylight and Sunlight

- 8.10.1 A Daylight and Sunlight Assessment has been undertaken for the development, to review both the impact of the proposed building on the light amenity of surrounding properties, and the levels of light experienced internally by the future residents of the development.
- 8.10.2 The assessment carries out an analysis of the proposed situation, following the methodology set out in the BRE Guide on Daylight and Sunlight.
- 8.10.3 The findings note how there will be a small amount of which could be considered to have a reduction in terms of vertical sky component. However, the rooms that these windows serve will maintain an adequate level of average daylight factor within in the proposed scenario. It should be noted that these rooms predominately relate to bedrooms where the degree is less severe.
- 8.10.4 In the proposed buildings, it has been found that the Average Daylight Factors to habitable rooms will largely attain ADF levels equal or above the target values set in the BRE guide. It has been calculated that reasonable sunlight is provided to living rooms and also to the amenity area.
- 8.10.5 The development is required to meet the needs of the town and supports the Council's overarching regeneration objectives. The scheme makes a meaningful contribution towards the Borough's targets in housing, retail and leisure. Therefore, the overall planning benefits of the scheme are a material consideration.

8.11 Noise and Air Quality

- 8.11.1 The application is supported by a Noise Assessment. The report sets out a description of the existing noise environment in and around the site and it considers the ambient noise levels. Ambient levels are dominated by road traffic noise on Marketfield Way, High Street and Cromwell Road. Noise from passing trains to the east of the site, footfall noise and car parking also contribute to the ambient noise climate in the town.
- 8.11.2 To this effect, it was found that the existing tranquillity levels at and around the site is not highly prized. In addition, no businesses or uses have been found in close proximity which would be adversely affected by the proposals.



8.11.3 The Assessment advises that the impacts on noise and quality of life of the occupants will be mitigated through installation of appropriate glazing systems with alternative means of ventilation which are compliant with Building Regulations. Therefore, the scheme will form compliance with Section 123 of the NPPF.

8.11.4 The Assessment also reviewed the potential noise generation arising from the proposed development. In consideration of the NPPF test in Section 123, points A and B, the proposed development is not expected to have an adverse impact on health or quality of life. Noise levels arising from deliveries to the site are predicted to be within the BS B2333 criteria at existing sensitive receptor locations on the basis of worst case assumptions.

8.11.5 Noise levels from proposed building services plant have been modelled and it has been demonstrated that emissions from plant will be at or below the background noise levels at nearby existing noise sensitive receptors. Therefore, the proposed development is concluded not to have a significant adverse impact on health or quality of life.

8.11.6 Overall, the noise assessment demonstrates that the proposed development has been designed to reduce the effects of noise upon future occupiers and minimise levels of noise generation. Therefore, the proposals are compliant with RBBC's Core Strategy and Saved Local Plan.

8.11.7 An air quality assessment has also been prepared in support of the planning application which focuses on both construction and operational impacts on future and existing occupiers of the development.

8.11.8 The report states that there is a 'medium' potential for impact of dust emissions associated with the construction phase of the development, at some worst affected receptors, without mitigation. However, with the adoption of appropriate site mitigation measures, which would be based on Section 8.2 of the IAQM Guidance on the Assessment of Dust from Demolition, Earthworks, Construction and Trackout, the emissions from construction phase would *"not be significant"*.

8.11.9 Therefore, the effect of emissions as a result of the construction would not be significant with respect to potential effects on health and amenity of the area.

8.11.10 In terms of the operational stage impacts, the air quality assessment has modelled a series of scenarios which take into account the effect of emissions from traffic associated with the



scheme, it has shown that the contribution from the development will be '*negligible*' and no proposed receptors would require additional mitigation.

8.11.11 Therefore, there will not be any detrimental impacts on existing and proposed levels of amenity in terms of noise and air quality. The proposals are in accordance with Saved Local Plan Policy's HO9 and HO10.

8.12 Ecology, Landscape and Trees

8.12.1 The application site is an existing surface car park and commercial buildings along the High Street, thus has very little ecology and landscape value.

8.12.2 The accompanying Ecology report notes how the site and surrounding area is generally of low or negligible ecology value. The report recommends the use of green and brown roofs including wildflower planting and the installation of bird boxes in or on new building walls. The development proposals have successfully accounted for this.

8.12.3 The development proposals will include new shared public surfaces dissecting the site. These areas will act as key links from the station through the application site to the rest of the town centre.

8.12.4 The area will incorporate quality paving slabs to reflect the existing paving material within the town centre. The public landscaping strategy will include the replanting of deciduous species which will offer seasonal variation and interest to the streetscene.

8.12.5 In planning terms, the loss of low to moderate quality onsite specimens and their replacement with higher quality trees, is supported. The proposed development will comply with Saved Policy HO9 and Core Strategy Policy CS2 as it will enhance both the natural and built environment.

8.12.6 The development proposals will also include a private amenity space measuring 487 sq m, located at level 2 within the residential block. The area will contain shared seating space and a range of shrubs and perennial planting.

8.12.7 As recommended by the Ecology Report, the planning application proposals a range of green and brown roofs, which will comprise wildflower planting or sedum planting, thus increasing the ecological value of the area.



8.12.8 The development will provide sufficient private and shared amenity areas, thus supporting the aims of RTCAAP Policy RTC2 – 11 and Core Strategy Policy CS2 through the provision of valued green infrastructure.



9.0 Conclusions

- 9.0.1 This planning statement along with the other supporting documents is submitted in support of a full planning application for a mixed-use development within Redhill Town Centre. It has been demonstrated that the proposals accord with the relevant national and local planning policy context and are supported by the allocation of the site for mixed use development within the Redhill Town Centre Area Action Plan.
- 9.0.2 Redhill is signalled within the development plan for major regeneration and it is clear that this landmark mixed use town centre scheme will contribute positively towards Redhill's regeneration. It will support the Council's focus on the town so that it provides greater vitality and facilities for the community and is able to compete more effectively with neighbouring towns and centres.
- 9.0.3 The redevelopment of this brownfield site is supported in planning policy terms which promotes the reuse of previously developed land in sustainable locations that are well served by public transport and the scale of development makes efficient use of a previously developed site.
- 9.0.4 The accompanying Transport Assessment and this Planning Statement demonstrate that there is surplus town centre car parking within the town. This is expected to increase further through the redevelopment of the Sainsbury's and Train Station site. It is expected that the additional public car parking within the Sainsbury's redevelopment will become available in 2017, prior to the opening of this development.
- 9.0.5 The development proposals are supported in planning policy terms with the Core Strategy, Saved Local Plan and Town Centre Area Action Plan, all of which support major retail and leisure redevelopment at Marketfield Way. The provision of high quality commercial units will contribute to the vibrancy and vitality of the town centre and will ensure that the town is able to meet the identified shortfalls in retail and leisure needs.
- 9.0.6 Allied to this, both the Town Centre Area Action Plan and Retail and Leisure Needs Assessments identify that the Borough has a shortfall in cinemas and notes how Marketfield is the appropriate location to direct such large scale leisure facilities. In addition, the application is supported by a significant number of high quality homes, which are much needed within the Borough and will make a meaningful contribution towards the identified housing target, reducing pressure on the green belt.



- 9.0.7 It is clear that the development will contribute to the evening economy and help transform the town centre into a vibrant, safe and welcoming place. Together the uses proposed will help convert this part of the town into a place where people want to live, visit and work, thus fully meeting the objectives of regeneration and sustainable development.
- 9.0.8 The proposals have evolved through an extensive and robust pre-application process, involving meetings with the LPA, Redhill Ward Members, Regeneration Forum, Reigate and Banstead Councillors and the general public. The scheme was presented at a public exhibition (9th – 12th of March) with the design team attending two full days (Wednesday the 9th of March and Saturday the 12th of March) to take questions and observations from the general public.
- 9.0.9 It was taken from the exhibition that the development proposals were positively received with 96% of respondents supporting the Council's intentions of the provision of new retail and leisure facilities within the town. At the same time, 91% of respondents supported the proposal to provide new town centre housing.
- 9.0.10 The scheme as proposed is at a suitable density for the highly accessible, sustainable area, in close proximity to Redhill Train Station and Redhill Bus Station. Cues on scale and massing have been taken from surrounding buildings, including the neighbouring Kingsgate House and Red Central. The proposed residential element of the scheme would extend to 13 storeys which would become the tallest buildings within the town, providing a focus for one of the key entry points into the town centre.
- 9.0.11 An aim of the scheme is to create a new landmark wayfinder for the town to draw people from the train station and from Brighton Road. It is considered that the taller building is supported in planning policy terms through the site allocation within the Town Centre Area Action Plan as suitable for taller buildings. This is supported by a robust design and evaluation process which considers the scale, form and design in the context of key views.
- 9.0.12 Overall, the application proposes a high quality town centre environment and removes the uninspiring existing surface car park and unattractive buildings and replaces this with a new landmark scheme. The proposed development therefore contributes to the regeneration of Redhill and achieves a sustainable development by improving the economic, social and environmental conditions of the area. It therefore accords with the development plan and NPPF.



Appendix A Resident's respondents form from public exhibition





Questionnaire: Marketfield Way

Redevelopment of Marketfield Way Car Park and Buildings along the High Street

WYG is working on behalf of Reigate and Banstead Borough Council to prepare a planning application for the redevelopment of the Marketfield Way Site as shown at this exhibition.

We have set out a number of questions and an opportunity for more detailed comment below:

1. To help us understand your interest in the area and our proposals, please let us know whether you are a:

- Local resident living within the immediate vicinity of the new development
- Resident with an interest in the area
- Work in the local area
- Business owner in the local area
- Community organisation or resident's group
- Other – Please provide details below

.....

2. Please let us know how you have participated in this consultation?

- I attended the exhibition at the Warwick Quadrant Information Centre
- I viewed plans on the Council's website
- Other - Please provide details below

.....

3. Do you agree Redhill town centre is in need of improvements in shops, restaurants and leisure facilities?

- Yes
- No

Comments

Very much so!

.....

4. Do you agree it needs a new multi-screen cinema?

- Yes
- No

Comments

I have young children and really do NOT want them to be hanging around with nothing to do so a cinema would be perfect.

5. Do you support the development of new high street shops and restaurants?

- Yes
- No

Comments

.....



Questionnaire: Marketfield Way

6. Do you agree that making use of a town centre site for homes is an effective use of land and helps reduce pressure on the green belt?

Yes

No

Comments

.....
.....

7. Do you support the proposed design of the new apartment blocks?

Yes

No

Comments

.....
.....

8. Do you support the overall layout of the development and connections with the town centre and railway station?

Yes

No

Comments

.....
.....

9. Do you support all parking for new residents being underground, so that there is no parking on street?

Yes

No

Comments

As long as it is secure so no one can access unless a resident or visitor
.....
.....

10. What do you like most about the proposals?

The opportunity for future jobs and entertainment for the young children.
.....
.....

11. What don't you like about the proposals?

Public parking will be reduced
.....
.....
.....

12. Do you have any other comments that you would like us to consider in finalising our proposals for the site?

Very excited about all of the proposed redevelopment of Redhill.



Questionnaire: Marketfield Way

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About you (Optional) – Note this information will only be used for the purposes of this consultation.

Name: CAROLINE BIRCH

Address: 9 COLEBROOKE ROAD

Postcode: RH1 2BL

Please place this questionnaire in the box provided at the exhibition or return to WYG (at the address below) by **18 March 2016**

WYG Planning, 100 St John Street, London, EC1M 4EH

This questionnaire is available online:
(visit www.reigate-banstead.gov.uk/redhillregeneration)

Please email your response to the following email address:

regeneration@reigate-banstead.gov.uk



Appendix B Pre-application Advice letter (PAM/15/00448)



Places & Planning

Via Email: giuseppe.cifaldi@wyg.com

Our Ref: PAM/15/00448
Your Ref:
Date: 29 January 2016

Dear Giuseppe

**RE: Pre-Application Meeting
Marketfield Way Car Park
Proposed Redevelopment Of The Site Including Residential, Retail, Leisure,
Associated Basement Car Parking**

I refer to your pre-application enquiry/request for advice in respect of the above site and our meeting on 07/01/2016 at which we discussed the proposals for a mixed-use development of retail, leisure and residential development.

Having considered the information supplied I am able to offer the following advice regarding the principle and detail of the proposals.

Site Context

The site is currently occupied in the main by a surface car park but also contains some retail units. It is adjacent to some larger developments, such as Kingsgae House to the south with a new flatted development proposed opposite at the former Embassy site. To the north the Victorian parade is locally listed and designated as a Conservation area.

Planning Policy

The site is allocated within the Draft Redhill Town Centre Area Action Plan for a mixed use retail and residential development and the principle of development is therefore acceptable.

Considerations

The proposal comprises a multiplex cinema with supporting retail, restaurant and leisure uses, as well as residential apartments above. Undercroft parking would be provided for some of the residential units but would be well below a 1:1 parking ratio.

The new retail, restaurant and cinema uses are to be welcomed within the town centre and would likely add to its attractiveness as a destination, as well as its vitality and viability. The maximisation of the active frontages were discussed and could be achieved with a walkway through the development which is encouraged to be

optimised for active uses and street activity. The Marketfield Way frontage would also be improved through the addition of an active frontage.

The general massing and design of the scheme appeared acceptable with regards its impact on the High Street and Marketfield Way, as well as the heritage assets to the north. One area of uncertainty remained however with regards the landmark, tower, feature at the southern extent of the building adjacent to Marketfield Way. Whilst the principles behind wanting a landmark feature here are understood, concerns were raised regarding how this would compete with the glazed tower at the southern extent of Kingsgate House which provides the existing gateway feature upon entering the town from the south. Further details of the tower would be needed in order to understand whether this could be accommodated without harming the townscape and longer-range visual assessment/images would be necessary from the main public viewpoints.

The other area lacking detail for comment is the elevation of the cinema building which should be detailed to ensure it does not appear as a big blank box within the middle of the town centre.

The general approach to design, with recessed balconies and detailing to help draw the eye, is however agreed. Brick construction would be acceptable but the over-use of brick types/colours used extensively elsewhere in the town is discouraged in favour of a more varied brick type.

It is doubtful as to what trees could remain on the site as a result of the development or what potential there would be for new planting but any street trees or public realm planting is encouraged to help green the town centre environment.

Car parking is offered in an under-croft but this would fall short of a 1:1 ratio for the residential apartments. Under current policy however there would be no objections to this given the sustainable location with good public transport links and public car parking opportunities.

Within Redhill town centre there would be no CIL payable to the residential element of the scheme but affordable housing would be required by current policy. If this is not viable within any potential development then an open book viability appraisal should be submitted with the application to demonstrate this. The appraisal would be scrutinised independently.

It was agreed that a list of potential application documents and requirements would be provided for my agreement.

I trust that this information and advice is helpful in clarifying the development potential for the site, and the design approach that you would be expected to demonstrate had been followed as part of any subsequent planning application.

Please note that while this advice is given in good faith, it is based only on the information supplied and discussed at our meeting, and is an officer view only based on my own personal judgement. It does not guarantee any subsequent decision on a formal planning application by the Council as Local Planning Authority.

Yours sincerely

Andrew Benson

Major Development Team Leader

Direct dial: 01737 276175

Email: andrew.benson@reigate-banstead.gov.uk