

SD45



RBBC Submission Development Management Plan

Sustainable Urban Extensions - Phasing

August 2018

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1. Introduction

- 1.1 This report provides the justification for 'Policy MLS1: Phasing of urban extension sites' in the [Submission Development Management Plan](#) (DMP).
- 1.2 This report should be read alongside the following documents:
- SD7: [Core Strategy Examination Sustainable Urban Extensions \(Stage 1\) Broad Locations Technical Report \(November 2012\)](#)
 - CD17: [Core Strategy Inspector's Report \(January 2014\)](#)
 - SD8 (a & b): [Development Management Plan \(Regulation 19\) Sustainable Urban Extensions \(Stage 2\) Site Specific Technical Report, Parcel Assessment Forms and Boundary Strength Addendum \(June 2016\)](#)
 - SD33 (a – c): [Development Management Plan \(Regulation 19\) Green Belt Review \(October 2017\); Parcel Assessments; Anomalies; and Washed over and inset areas](#)
 - CD3: Development Management Plan (Regulation 19) [Sustainability Appraisal](#) (October 2017; updated May 2018)
 - CD7: Development Management Plan [Publication Statement](#) (May 2018)
 - RCCB-DMP-001a: [Housing trajectory Position at 30th June 2018](#) (August 2018)

2. Policy Context

National Planning Policy Framework (2012)

- 2.1 Paragraph 47 of the National Planning Policy Framework 2012 (NPPF) requires local planning authorities to significantly boost the supply of housing. To achieve this they should:

- use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- identify and update annually a supply of specific deliverable¹ sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.

¹ To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

- identify a supply of specific, developable² sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.

Reigate & Banstead Core Strategy (2014)

Core Strategy Policy CS13

- 2.2 The Core Strategy Policy CS13 outlines the Council's housing target and the strategy proposed to meet these needs, which includes the requirement for phasing of Sustainable Urban Extensions (SUEs) in the DMP.
- 2.3 Policy CS13 states that the Council will plan for delivery of at least 6,900 homes between 2012 and 2027, and identifies where housing will be delivered as follows:
- a. At least 5,800 homes within existing urban areas
 - b. The remainder to be provided in sustainable urban extensions in the locations set out in policy CS6.
- 2.4 Policy CS13 states that the Council will identify and allocate in the DMP the necessary sites to deliver these homes in accordance with the policies in the Core Strategy.
- 2.5 Paragraph 7.4.5 of the supporting text for Policy CS13 clarifies why SUEs are likely to be required. This notes that although other unanticipated urban opportunities may come forward, housing land supply evidence indicates that it will not be possible to accommodate the total level of planned housing growth within the existing urban area.
- 2.6 The policy goes on to state that:

Sites for sustainable urban extensions within the broad areas of search set out in policy CS6 will be released when such action is necessary to maintain a five year supply of specific deliverable sites (based on the residual annual housing requirement). The phasing of sustainable urban extension sites will be set out in the DMP and will take account of strategic infrastructure requirements. (Underline added for emphasis)

² To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

- 2.7 The policy also clarifies that indicators used to monitor this policy will include the housing trajectory and five year land supply.

Core Strategy Policy CS6

- 2.8 As set out in Policy CS13, Policy CS6(3) identifies the broad areas of search for SUEs, which were informed by the Sustainable Urban Extensions Broad Geographic Locations Technical Report 2012. The policy states:

The Council will also allocate land beyond the current urban area for sustainable urban extensions, based on an assessment of the potential within the following broad areas of search (in order of priority):

- a. Countryside beyond the Green Belt adjoining the urban area of Horley
- b. East of Redhill and East of Merstham
- c. South and South West of Reigate.

Sites beyond the current urban area will be released for development in accordance with policy CS13 and detailed phasing policies within the DMP.
(Underline added for emphasis)

Policy CS8 and supporting text

- 2.9 Policy CS8 sets out the scale and location for different types of development and the supporting text to Policy CS8 also provides some further context to take into account when considering phasing, as follows:

- **Paragraph 6.6.9 - Redhill/Merstham:** The detailed phasing of sites will take account of the need to provide site-specific mitigation measures. It may also be related to the delivery of strategic infrastructure schemes, such as:
 - a) the balanced network highway scheme in Redhill
 - b) the provision of sufficient school capacity (secondary and primary)
 - c) improvements to service provision within Merstham Estate Local Centre.
- **Paragraph 6.7.9 - South/South west Reigate:** The detailed phasing of sites will take account of the need to provide site-specific mitigation measures. It may also be related to the delivery of strategic infrastructure schemes.
- **Paragraph 6.8.9 - Horley:** The detailed phasing of sites will take account of the need to provide site specific mitigation measures. It may also be related to the delivery of strategic infrastructure schemes, and may need to take account of any reliance on infrastructure being delivered as part of the North East and North West sectors.

3. Initial considerations

- 3.1 In line with the Core Strategy and national policy, the Council has identified and allocated in the DMP sufficient sites to ensure that there is a continued supply of land to deliver the housing target over the Local Plan period (2012 – 2027).
- 3.2 As part of the site identification process there was a strong emphasis on identifying suitable sites within the town centres and urban area where possible in line with the priorities set out in Core Strategy Policy CS6. However, an updated housing trajectory (see [DMP revised housing trajectory](#)) is still indicating that SUEs will be required to deliver the amount of housing necessary to meet the housing target.
- 3.3 12 SUEs have been included as site allocations in the DMP, informed by the Sustainable Urban Extensions (Stage 2) Site Specific Technical Report. As the Core Strategy requires that sites beyond the current urban area are released for development in accordance with detailed phasing policies in the DMP, the role of this paper is to consider how sites will be phased and the process/mechanism for release.

Phasing methodology

- 3.4 It is clearly set out in the Core Strategy Policy CS13 that SUEs will not be released for development until necessary to maintain a five year supply of specific deliverable sites (based on the residual annual housing requirement). This point was examined in the Core Strategy Inspector's Report³, where the Inspector noted that:

“introducing the often easier-to-develop greenfield sites at an early stage risked undermining the “urban areas first” strategy which lies at the heart of the Core Strategy. Consequently an approach which allows greenfield sites only when necessary to maintain a five year supply is sound.”

- 3.5 Therefore, if a date was set for the release of each site, linked to the housing trajectory, then this could undermine the strategic approach set out in the Core Strategy. A date would not provide the flexibility required to allow for unforeseen windfall sites which may reduce the requirement for urban extensions in the plan period.

³ Paragraph 71

- 3.6 DMP Policy MLS1 therefore links the release of sites for development with the five year housing supply calculation. It is considered that this approach strikes a balance between maintaining a stable land supply and ensuring that greenfield sites are only released when necessary, in line with the Core Strategy.
- 3.7 In addition, as the SUEs would deliver a cumulative total of 1005 new homes, it was not considered appropriate to enable them to come forward all at once, particularly given the potential impact on infrastructure.
- 3.8 Therefore, the release of SUE sites for development should only amount to that necessary to deliver the capacity required to cover the calculated shortfall in the five year supply, with a small (specified) margin to provide some flexibility. This would be done as part of the annual monitoring process.
- 3.9 A number of comments were raised regarding Policy MLS1 at Regulation 19. The Council's response to these can be found in CD7: [Publication Statement](#).

4. Phasing

Step one – Priority hierarchy

- 4.1 The priority hierarchy set out in Policy CS6 was used as a starting point for the phasing of the sites. This hierarchy was informed by the SUEs Technical Report Stage 1 which identified that the Countryside beyond the Green Belt (Horley Surrounds) should be prioritised for growth as it falls beyond the Green Belt. Consequently, the following sites were initially phased first:
- NWH1: Land at Meath Green Lane, Horley
 - NWH2: Land at Bonehurst Road, Horley
 - SEH4: Land off The Close and Haroldsea Drive, Horley
- 4.2 However, the Sustainable Urban Extensions Technical Report (Stage 1) and the Core Strategy Inspector's Report⁴ was clear that not all the shortfall in housing could be provided on the Countryside beyond the Green Belt. The CS Inspectors' Report⁵ concluded that:
- “Given the limited capacity of suitable and deliverable greenfield land outside the Green Belt, the only option available within the borough to meet the bulk of the housing shortfall is land currently in the Green Belt.”* As a

⁴ Paragraphs 41-45

⁵ Paragraph 46

consequence, a number of SUEs have been identified on what is currently Green Belt land.

Step two – sustainability and Green Belt assessments for Green Belt sites

- 4.3 The Core Strategy Inspectors Report 2014⁶ noted that the SUEs Technical report (Stage 1) identified East of Redhill/Merstham and South/South-West of Reigate as the most appropriate broad locations. It gave highest priority to the SUE East of Redhill/Merstham, finding this broad location to have the best fit with the overall spatial strategy, to be the most accessible and to make a lesser contribution to Green Belt functions than the location South/South-West of Reigate; albeit it still had certain constraints. In terms of the SUEs South/South-West of Reigate the report noted that the poorer accessibility and transport linkages are the main reason for its lower priority than East of Redhill/Merstham, though some transport improvements should be achievable. This is reflected in the hierarchy set out in Policy CS6 but given that these assessments were done at a higher strategic level it is important to test these assumptions using the site specific assessments undertaken to inform the DMP.
- 4.4 To phase the SUEs in the Green Belt, they were assessed on their relative sustainability and contribution to Green Belt purposes, as well as any key infrastructure timing constraints.
- 4.5 The sustainability assessment of each of the specific urban extensions sites, through the DMP stage provided an initial ranking of the Green Belt SUEs.

Site	Sustainability Appraisal
ERM1 - Land at Hillsbrow	
ERM2 - Land West of Copyhold Works	
ERM3 - Former Copyhold Works	
SSW6 - Land west of Castle Drive	
SSW7 - Land at Hartwood Nursery	
ERM5 - Land at Oakley Farm	
ERM4 - Land South of Bletchingley Road	

⁶ Paragr

SSW2 - Land at Sandcross Lane	
SSW9 - Land at Dovers Farm	

4.6 Where sites are comparable in sustainability terms, the contribution that the site makes to the purposes and integrity of the Green Belt was used to further inform the release of the sites.

Broad Area	Land Parcel	Priority for protection
East Redhill	ERM2 – Paddock north of Nutfield Road	4 - lowest
East Merstham	ERM5 – Oakley Farm	
East Merstham	ERM6 – Land north east of Merstham	
South West Reigate	SSW2 – Land at Sandcross Lane	
East Redhill	ERM1 – Hillsbrow	3
East Redhill	ERM3 – Former Copyhold Works	
East Merstham	ERM4 – Land south of Bletchingley Road	
South West Reigate	SSW7 – Hartswood Nursery and surrounds	
South West Reigate	SSW9 – Land at Dovers Farm	2
South West Reigate	SSW5 – Land south of Slipshatch Road	
South West Reigate	SSW1 – Shepherds Lodge Farm	
South West Reigate	SSW3 – King George’s Field	
South West Reigate	SSW6 – Land west of Castle Drive	1 - highest
South West Reigate	SSW6A – Land West of Castle Drive	
South West Reigate	SSW4 – Land at Clayhall Lane	
South West Reigate	SSW8 – Land west of Dovers Green Road	
South West Reigate	SSW10 – Land east of Dovers Green Road	

4.7 Site SSW6 as a whole was ranked at level 2, suggesting it is a high priority for protection. However a small sub-section of SSW6 was not felt to conflict seriously with the purposes of the Green Belt and is considered

4.8 Given that a number of the sites have the same rankings from the sustainability appraisal, the Green Belt assessment was also applied to assess if any of the sites functioned better or worse in Green Belt terms. The following summarises the sustainability appraisal and Green Belt assessment, and the sites have been rearranged accordingly.

Site	Sustainability Appraisal	Green Belt Assessment
ERM2 - Land West of Copyhold Works		4
ERM3 - Former Copyhold Works		3
ERM1 - Land at Hillsbrow		3
SSW6 - Land west of Castle Drive		3

SSW7 - Hartswood Nursery		3
ERM5 - Oakley Farm		4
ERM4 - Land South of Bletchingley Road (now split into two sites 4a and 4b)		3
SSW2 - Land at Sandcross Lane		4
SSW9 - Land at Dovers Farm		3

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Step 3 – Site constraints or infrastructure requirements

- 4.9 In line with the Core Strategy, site specific constraints and infrastructure requirements have also been considered.
- 4.10 **Site NWH1:** is subject to access through the North West sector, as access should not be taken off Meath Green Lane (which is stipulated in the policy). The developers of the North West sector provided the projected completion timeframes below in December 2017:

Year	2016/17 (completed)	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	Total
(Old) Horley North West Projection	15	156	156	156	156	156	156	156	156	156	91	1510
(New) Horley North West Projection	15	254	180	180	180	180	180	180	161			1510

These recent projections for the North West sector show that the development could be completed by 2024/2025 so there is a reasonable prospect of the highways infrastructure required to support NWH1 being available prior to this time to enable NWH1 to come forward. However, the phasing of the site reflects that this site may not be able to come forward along with the other Countryside beyond the Green Belt sites, but if the infrastructure is in place then it will be prioritised.

- 4.11 **Site ERM2/3:** This site is adjacent to the Patteson Court Landfill. The landfill operators, Biffa Waste Services, applied for an extension of time for operation of the Landfill until 31 December 2030 (Ref RE07/0791). In this planning application, Biffa estimated that the landfill operations would need to continue on site for an additional 13 years beyond 2014 under the rate of landfilling at that point in time, and that approximately 3 years would be required after this for remediation which would take them to 31 December 2030 (as per the planning permission).
- 4.12 Policy MLS1 therefore links ERM2/3 with an extended timescale dependent on ensuring the landfill sites operation is not compromised. It is acknowledged that should a suitable development not be achievable (i.e. due to noise, traffic etc) even when the operations of the landfill are starting to reduce towards the end of the plan period then this site would not be able to come forward in this plan period. Inclusion of the site does, however, give the flexibility if other sites do not deliver as expected, and a suitable scheme can be achieved at 2026/2027 in line with estimations for when the landfill operations will start to reduce.
- 4.13 The rate of landfilling is dependent on unpredictable circumstances, particularly levels of recycling and if waste is to be accepted from outside the county which was not previously the case as set out in paragraph 69 of the Officer's report accompanying the extension of time planning permission (Ref: RE07/0791) . However, achievement of the housing target does not rely on delivery of this site. Removal of this site from the Green Belt, recognising that at some point it will be suitable for development, is also in line with the NPPF as it ensures that Green Belt boundaries will not need to be altered at the end of the plan period.

Infrastructure generally

- 4.14 In addition, the staggering of the release of sites will lessen the pressure on infrastructure in the borough, particularly as the SUEs are concentrated in the south of the borough.
- 4.15 The Horley North West sector, which is currently being built out to the north of Horley, is a large development of approximately 1500 new homes, which will bring additional traffic and impacts on the road network. This includes the Woodhatch junction to the south of Reigate and S106 money from the Horley North West sector is currently being used to fund investigation works to see how this junction can be improved, given there will be an inevitable increase in use at this junction from those living in the North West sector. By having the bigger Woodhatch sites (SSW2 and SSW9) programmed later in the plan period, this would enable the Horley North West sector to bed in and the impacts to be better understood.

- 4.16 Furthermore, in Merstham there has been a recent planning permission granted for a temporary school facility (Ref: 17/02891/F) to accommodate children whilst a permanent school is built (planning permission is currently pending for the permanent school - Ref: 17/02890/OUT). This would replace an existing Special Education Needs (SEN) school, and the school roll would increase from the current 62 pupils and 65 staff to 900 pupils. It is envisaged to reach full capacity by September 2025. The timing of release and staggering of the Merstham sites would allow the new school to bed in and impacts to be better understood.

5. Policy considerations and conclusions

- 5.1 In the event that the Council's Authority's Housing monitor identifies that the Council does not have a five year supply of housing (based on the residual annual housing requirement), the Housing monitor will also identify which allocated urban extension sites will be released for development. This will be based on the prioritisation within the DMP and the size of the five year land supply deficit. Only those sites necessary to cover the shortfall in five year supply would be released at any one time.

- 5.2 The current housing trajectory (see the revised August 2018 DMP [Housing trajectory paper](#)) identifies there will need to be three releases of sites as follows:

In 2024/25 there would be a need to release:

- SEH4: Land off The Close and Haroldslea Drive
- NWH1: Land at Meath Green Lane
- NWH2: Land at Bonehurst Lane

In 2025/26 there would be a need to release:

- ERM1: Land at Hillsbrow
- SSW6: Land west of Castle Drive
- SSW7: Hartswood Nursery
- ERM5: Oakley Farm off Bletchingley Road

In 2026/27 there would be a need to release:

- ERM4a: 164 Bletchingley Road
- ERM4b: Land South of Bletchingley Road
- SSW2: Land at Sandcross Lane

For this trajectory, there would be no need to release proposed SUEs within the Plan Period:

- SSW9: Land at Dovers Farm
- ERM2/3: Land west of Copyhold Works and Former Copyhold Works

- 5.3 It is acknowledged that there may be some gaps in delivery, as set out in the August 2018 housing trajectory. However, there is a high level of delivery in the borough to date and the total amount of delivery will exceed the Core Strategy housing target.
- 5.4 The policy also encourages close and proactive working with landowners/developers on the allocated urban extensions to ensure that schemes are able to proceed to delivery as expediently as possible when they are released. The policy therefore encourages the use of Planning Performance Agreements to ensure a streamlined planning process.
- 5.5 The policy also provides flexibility to accommodate unforeseen circumstances, such as a site not coming forward or being able to obtain planning permission. The policy allows sites to come forward prior to their release where it can be demonstrated that higher priority sites are not deliverable within a timescale which would address the five year supply shortfall; and it can be demonstrated that any site-specific constraints or infrastructure requirements associated with the site can be adequately addressed prior to, or in the early stages of, development.
- 5.6 To ensure a comprehensive development the policy also includes the following requirement, with an additional sentence proposed by the council as a minor modification⁷, following Regulation 19 comments from Biffa Waste Services, to reflect that necessary works may be required to ensure the efficient operation of the Landfill:
- “planning permission will not be granted for any proposals which would prejudice or compromise the long-term comprehensive development of an urban extension allocation. This excludes proposals for necessary works to support the efficient operation of the Patteson Court Landfill.”*
- 5.7 It is considered that this approach strikes a balance between maintaining adequate land supply and ensuring that greenfield sites are only developed when needed .

⁷ RBBC-DMP-0003 Minor Modifications Schedule to the Submission DMP