

## **REIGATE AND BANSTEAD DMP EXAMINATION**

Hearing statement – Jonathan Essex, East Surrey Green Party

### **Matter 5 – Housing Land Supply and Delivery**

#### **Land Supply**

Just how is land supply (availability) affecting delivery? Major housebuilders now have a land bank average eight years<sup>1</sup> of housing delivery, whilst the councils are required to maintain a five-year land supply. This means in many areas the land supply is affecting *where* housing gets built, including on the green belt, rather than ensuring it does take place.

Densities proposed in the HELAA are lower than that deliverable, and indeed densities recently delivered in similar locations. This undermines the Phasing projections and thus the need to safeguard.

#### **Delivery**

The need to schedule the (sustainable)<sup>2</sup> urban extension sites is challenged as realistic density targets across existing and additional urban sites (as highlighted in earlier submissions) would remove the need for SUEs.

The schedule order should exclude ERM2/3 as undeliverable within the plan period due to the timing of the current operations of the landfill site. The aspiration that this will be finished within the plan period is not consistent with the current restoration plans (as approved to Surrey County Council, the Minerals Planning Authority) which makes this site undeliverable within the plan period.

The rationale for the site order is still challenged. This should be prioritised based on impact on greenbelt integrity, relative landscape and biodiversity impact, and potential for sustainable development. This would increase the soundness of the plan. In these aspects ERM1-3 are expected to score lower (BOA in ERM2/3, link to Greensand ridge, position at top of steep hill, current understatement of level of traffic/traffic congestion on A23).

### **Matter 8 – Other Development Management Policies**

In Reigate and Banstead there is a minimum sustainability standard for buildings, but not for homes. In July this year the government relaxed its restriction and now allows local councils to set higher standard for energy efficiency:

*For too long local authorities have been unclear about whether they could set higher standards on carbon reductions for new homes, with many erring on the side of caution and reluctantly watering down their planning policy requirements. Having strongly advocated freedom for cities and local authorities to take a leadership role, UKGBC is delighted that*

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<sup>1</sup> <https://www.bigissue.com/latest/finance/a-land-banking-scandal-is-controlling-the-future-of-british-housing/>

<sup>2</sup> The labelling of these as sustainable is not accepted. For example, the true traffic level on the A25 and the realism of the Hillsbrow site encouraging pedestrian and cycling access to the town centre.

*Government has issued a decisive position, providing clarity for local authorities and giving the green light to go further than national minimum requirements.<sup>3</sup>*

This change has occurred since the Regulation 19 consultation. In the light of the recent report on the impacts of exceeding 1.5C of climate change (see IPCC Special Report 2018: Summary for Policy Makers)<sup>4</sup> and the above statement by the government, the council should strengthen policy CCF1 to require dwellings to be built to a Passivhaus standard, as previously proposed.

### **Matter 9 – Potential Development Sites**

Completion of part 2 of the Brownfield Site Register would increase development sites.

Other sites have come forward since the Reg19 consultation. For example, the Gasworks site in Earlswood (permission sought for demolition). Other sites that have come forward since the last update; including pre-application discussions, submitted planning applications and approved planning applications; should be considered in a revised calculation of housing need for the remainder of the plan period.

### **Matter 10 - Horley Business Park**

The following points are set out to highlight principle areas of unsoundness:

- **Speculative Nature of Large-Scale Industrial Need.** It is not clear that this site represents a specific need in Reigate and Banstead or the wider East Surrey Area. There are a number of large vacant existing sites in the market area and vacant units in nearby industrial areas in Crawley. These include the Legal and General site in Kingswood<sup>5</sup> and Pixham End in Dorking<sup>6</sup>. It is not clear who this site is for as a clear business case setting out the need is not presented. Focusing on this type of non-domestic floorspace is unimaginative and will dominate provision of new floorspace, at the expense of smaller, more sustainable locations.
- **Transport.** The Sustainability Appraisal states that traffic impacts should be 'mitigation should be identified at the planning permission application stage, at which point a more site specific transport assessment can be undertaken, but may include infrastructure improvements or measures to significantly reduce the number of trips generated by the development'. This approach is inadequate. The CO2 emissions of transport in Surrey are now going up and greenfield sites like this, distant from public transport links will likely increase car dependency and long-distance commuting. No transport modelling appears to have been carried out or reviewed as part of the plan making process.
- **Real Employment Need Should be provided where unemployment is highest.** This provision is not meeting demonstrable local need.

### **Matter 11 Safeguarded Land (Policy MLS2)**

What is proposed for this site is exactly the sort of peripheral urban sprawl that the Green Belt was created to prevent. In this case joining Earlswood to Salfords, Nutfield and on to NE Horley. No

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<sup>3</sup> <https://www.ukgbc.org/news/government-confirms-local-authorities-can-set-energy-standards-beyond-part-l-in-ppf/>

<sup>4</sup> [http://report.ipcc.ch/sr15/pdf/sr15\\_spm\\_final.pdf](http://report.ipcc.ch/sr15/pdf/sr15_spm_final.pdf)

<sup>5</sup> <https://www.propertyweek.com/news/landg-buys-assurance-divisions-doomed-campus-for-65m/5087882.article>.

<sup>6</sup> <https://www.commerciallistings.cbre.co.uk/en-GB/listings/property/details/GB-Plus-467087/no-1-pixham-end-rh4-1pt?view=isLetting>.

amount of 'buffering' can compensate for the loss of 'pioneering' which would destroy the Green Belt, and in doing so affect the overall integrity of London's Green Belt. As noted above, there is no requirement to safeguard this site – as the existing urban sites, not including the identified sustainable urban extensions are more than sufficient. The following summarises points made previously, that this site is unsound, as follows:

- **Safeguarding Not Required.** Minister Nick Boles stated that there is no requirement to safeguard for authorities with Green Belt land<sup>7</sup> and that safeguarded land should be identified 'between the urban area and green belt' (not possible in this case).
- **Not Require this land supply.** By applying appropriate urban densities, including derelict urban sites currently excluded (as noted in earlier submissions), completion of Brownfield Register Part 2 there is sufficient developable land within the urban areas of Reigate and Banstead to make this safeguarding proposal unnecessary.
- **Poor masterplan that fails to respect Green Belt integrity.** The proposed 1312 dwellings at 30dph is a very low density implying larger homes for open market (as part of overall 8000 homes at this density) do not meeting local need. The safeguarded site appears a standalone settlement by Thakeham Homes: developer-driven rather than need-driven, speculative and profit-seeking in nature. If the intention is to provide affordable homes then the actual land-take proposed is far in excess of that needed for the quoted number of homes on the site.
- **Undeliverable with respect to Transport.** Development is conditional on a new A23-M23 link and the cooperation of Tandridge District Council. Tandridge District Council is in not taking this forward in their Local Plan. M23 spur deliverability is not proven. Utilising existing A23 access is not tested, so unsound.
- **Greenbelt Function.** The site fails to fulfil the objectives of the Greenbelt: merging South Nutfield, Whitebushes and Salfords into one sprawling development (currently 3 separate villages), and coming close to bridging the Greenbelt from Redhill to the north and Horley to the south. This has been tested with the appeal refusal to build a hard runway on Redhill Aerodrome (over a much smaller area). This area is undulating farmland with extensive views, visible from the Greensand Ridge just to the north. The Safeguarded Land Evidence Document sets out development as "likely to have a significant negative impact on landscape character due to the size of the site in a currently developed area in the countryside." **Therefore, would have major and serious conflict with the purposes and integrity of the Green Belt".**
- **Transport.** The Evidence Document states the site "is some distance from sustainable transport facilities, but a new settlement of significant size could be planned around sustainable travel from the start". It would be a long walk to the railway stations at Nutfield, Earlswood or Salfords. It would generate thousands of extra vehicle movements, increasing congestion and air pollution, particularly on the A23. Surrey's carbon emissions from transport are now rising (see Figure 2.2, Surrey Low Emissions Transport Strategy)<sup>8</sup>. This would detract from this policy and lock-in infrastructure that makes it harder to meet the UK's carbon budget.
- **Sustainability Appraisal.** Scoring is subjective and also incorrect.

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<sup>7</sup> The Safeguarded Land Evidence Document quotes Nick Boles, who said in May 2014 while he was Planning Minister, "Safeguarding is not a requirement for every local authority with green-belt land. It is something that it can choose to do, but only if necessary. If the plan that it puts forward has provisions to meet housing needs in full and if other sites are available for potential future development beyond the life of the plan, it may well be that safeguarding land is unnecessary."

<sup>8</sup> [https://www.surreysays.co.uk/environment-and-infrastructure/low-emissions-transport-strategy/supporting\\_documents/Low%20Emissions%20Transport%20Strategy%20%20Draft%20for%20Public%20Consultation.pdf](https://www.surreysays.co.uk/environment-and-infrastructure/low-emissions-transport-strategy/supporting_documents/Low%20Emissions%20Transport%20Strategy%20%20Draft%20for%20Public%20Consultation.pdf).

- Affordable housing scores green++ (incorrect) while developer advertising average house price of around £650,000 (based on advertised council tax revenue expected once occupied).
- Health and Wellbeing. Score green+ (incorrect) based on pedestrian and cycling facilities and proposed green spaces but this is a car-dependant low-density proposal with new link the M23.
- Reduce the need for travel Score yellow (incorrect). The 'good for public transport' is currently non-existent public transport, and proposal for housing with a higher than average car ownership. Although NW Horley (the most recent comparable site) now has two bus connections, they run half hourly to Horley centre and hourly to Redhill and Reigate with limited service extent – not sufficient connectivity to persuade a busy family to give up their car, especially where the provision of corner shop, community facilities is sparse on such new estates.
- Make best use of previously developed land (incorrect) but proposed building on 4sqkm greenfield land at low density, whilst Brownfield Site Register is incomplete. Building on greenfield land (for 7830 of the 8000 proposed homes) should be classed as red.
- Provide employment opportunities. Green++. (incorrect) once built this is a housing site not employment site.
- Reduce greenhouse gases. Yellow (incorrect) on basis of transport impact.
- Use natural resources prudently. Yellow (incorrect). Low-density on agricultural land. Less resources will be used by build high-density affordable homes in the urban area.
- Adapt to climate change/flood risk. Yellow (incorrect). Building on this land which floods each winter will displace flood water.
- Reduce land contamination/safeguard soil. (incorrect) This is not decontaminating land but reducing soil value.
- Improve air quality. Yellow (incorrect). Should consider long-term negative transport impact.
- Protect and enhance landscape character. States 'development should be of sufficient density to represent a clear new settlement' which is patently untrue – an urban sprawl of low density development comprising 8000 homes, originally marketed as a 'garden village' and subsequently as a 'garden community' proposed, no acknowledge of impact of rural landscape or relationship to AONB.
- Conserve/enhance biodiversity. Yellow (incorrect). 8000 home development on a 98% greenfield site will have impact.
- Supporting economic growth. Ranked green++ (incorrect) The commentary says N/A: incorrect – this should not trump building on the countryside. **This suggests that some hierarchy of priorities is needed in the sustainability appraisal so that it functions as a strategic environmental assessment, and informs policy making. This is not the case.**

The above review of the Sustainability Appraisal calls into question the soundness of the other site appraisals, quite apart from whether they are up-to-date.