

**Matter 9 Statement: Potential
Development Sites**
Reigate and Banstead Development
Management Plan Examination

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1. Introduction

- 1.1. This Statement has been prepared by Indigo Planning on behalf of The School Government Publishing Company Ltd in response to the Inspector's Schedule of Matters, Issues and Questions published as part of the Reigate and Banstead Development Management Plan (DMP) Examination.
- 1.2. The School Government Publishing Company Ltd owns the land to the south of the former Darby House. This has been promoted throughout the DMP process. The site has been identified as a proposed sustainable urban extension site by the Council and is identified as Site ERM4b in the DMP.
- 1.3. This Statement addresses the Inspector's questions under Matter 9 which relate to the following issue:

“Whether the proposed site allocations are justified, effective and consistent with national policy in the NPPF.
- 1.4. This Statement has been submitted alongside other Statements submitted in respect of Matter 4 and Matter 5.

2. Matter 9a: Question 1

Question 1: Are the reasons for selecting the sites soundly based? Is there evidence that the development of each allocation is suitable, available, sustainable, viable and deliverable?

- 2.1. The School Government Publishing Company Ltd owns the land south of the former Darby House, Bletchingley Road (now Woodlands Close). Policy ERM4b of the DMP proposes to release this land from the Green Belt and allocate it for residential development.
- 2.2. We can confirm that the site is suitable, available, sustainable, viable and deliverable and, as such, the Council's decision to release the site from the Green Belt and allocate it for development is justified, effective and consistent with national planning policy.

To demonstrate the site's suitability, availability, sustainability, viability and deliverability we have submitted an outline planning application for "32 dwellings with all matters reserved except for access".

- 2.3. The submitted planning application provides a detailed suite of technical documents demonstrating that the redevelopment of ERM4b can provide 32 dwellings and would constitute sustainable development. The preparation of this planning application has been informed by extensive pre-application engagement with Borough Council and the highway authority.

3. Matter 9a: Question 2

Question 2: What is the expected timescale and rate of development? Is this realistic?

- 3.1. The Council's Housing Trajectory Position at 30th June 2018 (August 2018) paper identifies that site ERM4b will be released for development in 2026/27 in order for the Council to be able to demonstrate a five year housing land supply.
- 3.2. Notwithstanding the above, the Council's HEELA and the content of our Matter Statements demonstrate that Site ERM4b is developable and available for delivery now. A planning application for the site has now been submitted which demonstrates the landowners' intentions and ability to bring the site forward for development now.
- 3.3. Policy MLS1 of the DMP will unnecessarily restrict the delivery of site ERM4b at a time when the housing need of the Borough is rising. This rise in need is demonstrated by the DCLG's standardised methodology OAN figures for the Borough and needs to be addressed by the Council now as part of its five yearly review of the Core Strategy which should be completed by July 2019.
- 3.4. SUE allocations should be released for delivery now to bolster the Council's land supply position in advance of the implementation of the increased housing need figures for the Borough.

4. Matter 9a: Question 3

Question 3: What type of uses and scale of development would each site be expected to deliver? Are these appropriate and deliverable?

- 4.1. The HELAA assessment of the states that site ERM4b has a site capacity of 20 dwellings, and this site capacity is reflected in Policy ERM4b.
- 4.2. However, the HELAA appraisal did not fully assess the site's capacity and only provided an indication of how many homes could be supported on the site.
- 4.3. Since the Council's original HELAA appraisal of the site we have undertaken further technical work to assess the capacity of site ERM4b in more detail. This evidence was submitted to the Council as part of the Regulation 18 consultation. However, the Council have not revised the site capacity stated in the DMP.
- 4.4. Since then we have undertaken pre-application discussions with the Council. Officers have advised that the site is capable of supporting significantly more than the 20 dwellings identified for the site.
- 4.5. The submitted planning application for the site demonstrates that the site can support 32 dwellings.
- 4.6. Given the content of the site specific technical evidence submitted in support of the planning application, the Borough's rising housing need (see our Matter 5 Statement) and the national agenda to increase housing delivery, Policy ERM4b should be amended to reflect a site capacity of 32 dwellings.
- 4.7. Further, the NPPF at para 123 requires developments to make "optimal" use of sites.

5. Matter 9a: Question 4

Question 4: What are the site constraints, potential impacts or infrastructure requirements of the allocation and how could these be addressed?

- 5.1. The School Government Publishing Company Ltd owns the land south of the former Darby House, Bletchingley Road (now Woodlands Close). Policy ERM4b of the DMP proposes to release this land from the Green Belt and allocate it for residential development.
- 5.2. Set out below is a summary of the site, the surrounding area, site constraints, site capacity and deliverability. Where relevant we have cross referenced this summary with the DMP evidence base.

The Site

- 5.3. Site ERM4b measures approximately 0.9ha in area and comprises of amenity/open space. To the north the site is bounded by a residential development of 20 dwellings which has recently been built out. The site's western boundary is immediately adjacent to the grounds of Woodfield School. To the south the site adjoins the wetland nature reserve of Spynes Mere
- 5.4. A public right of way runs along the site's eastern boundary, outside of the site area. Beyond this public right of way lies a large residential plot which also contains a series of small farm buildings/barns. This area of land forms Site ERM4a which is also identified as a SUE allocation. Site ERM4a is not in the same ownership as Site ERM4b.
- 5.5. The perimeter of the site is lined by mature trees and hedgerow on three sides. In terms of site topography, the site gently slopes from north to south.

Surrounding Shops and Services

- 5.6. Bus services to Redhill and Reigate are available along Bletchingley Road, with a bus stop within 160 metres from the site entrance. The nearest railway station is Merstham, 1.6km to the north west of the site. This station provides regular services to London Victoria, London Bridge and Gatwick Airport.
- 5.7. A range of local facilities are available along Bletchingley Road in the recently developed local centre (Co-op, pharmacy, dry cleaners and bookmakers) which is 650m to the north west of the site. Further shops, services and leisure opportunities also available along the High Street near the station and along Nutfield Road. Merstham also possesses primary and secondary schools and a Doctors Surgery.
- 5.8. The shops, services and public transport links available in Merstham are capable of providing for the day to day needs of local residents. The Council's HEELA assessment of the site also confirms that the site has 'good' accessibility to local services and public transport.

Site Constraints

Highways and access

- 5.9. As highlighted in the HEELA the site is located within walking distance of local schools, shops, essential services and leisure facilities and well served by public transport.
- 5.10. Our technical work and engagement with Surrey County Council has confirmed that a safe and technically compliant access to the site can be delivered off the new residential development to the north of ERM4b. Securing an access at this point will connect ERM4b

into the highway network via Bletchingley Road. There are no third-party issues to overcome in regards to site access.

5.11. To inform our proposal we have prepared a Transport Assessment. This assessment has been subject to scrutiny from Surrey County Council as part of pre-application discussions. These discussions have confirmed that traffic flows generated from the site can be accommodated on the network and as such the impact of the development will not be significant.

5.12. The HEELA identifies no constraints in respect of highways matters.

Flood risk

5.13. The site is located entirely within Flood Zone 1, which has the lowest risk of flooding according to the Environment Agency and residential development is considered to be acceptable. This is also confirmed in the Council's HEELA. A robust surface water and foul drainage strategy can be implemented as part of any development of the site.

Heritage

5.14. There are no heritage assets on the site. Worsted Green Orchard, 164 Bletchingley Road lies immediately to the east of Darby House and is locally listed. The development of Site ERM4b for housing will not impact on the setting of this building as there is a clearly defined boundary between the two sites which restricts views between the two. In addition, the development of 20 dwellings to the north of ERM4b further indicates the site's suitability in terms of impact on heritage. The Council's HELAA assessment identifies no constraints relating to heritage matters.

Landscape and visual impact

5.15. To inform our proposals we have undertaken a baseline Landscape and Visual Impact Assessment (LVIA). The LVIA concludes the following:

- The residential development on the former Darby House site fundamentally restricts views of the Green Belt, from Bletchingley Road;
- The site is not discernible in long views and there are very limited views into the site from publicly accessible points nearby;
- Buildings of a domestic scale would be appropriate alongside the existing urban area and would not compromise the setting of Merstham; and
- The site would be screened by the retained trees and vegetation.

5.16. The Council's HEELA assessment identifies no constraints relating to landscape or visual impact.

Biodiversity

5.17. A Phase 1 Ecology Survey of the site has been undertaken. This Survey demonstrates that there are no habitats present on the site that are likely to attract any protected species. The trees provide some nest and roost cover for birds, however, these trees are located on the site's boundaries and will mostly be retained as part of any future proposed development.

Layout & Site Capacity

5.18. Appendix 1 of this Statement provides an indicative masterplan showing the proposed layout of site ERM4b. The proposed layout delivers the following:

- 32 dwellings which are predominantly 2 storeys in height. A limited number of 2.5 storey buildings are provided at key locations to aid the scheme's legibility and make for a varied and interesting street scene;
- A varied housing mix comprising 1 bed, 2 bed, 3 bed, 4 bed and 5 bed dwellings
- A site access off the existing residential development to the north;
- Retention and enhancement of perimeter tree and vegetation;
- A footpath connection to the existing bridleway along the site's eastern boundary
- 660 sqm of open space located at the southern end of the site adjacent to the Green Belt and bridleway
- 49 car parking spaces and 49 cycle parking spaces

5.19. The sketch Layout has been informed by our technical evidence and detailed knowledge of the site. Accordingly, we consider the site has a capacity of 32 dwellings.

Deliverability

5.20. In pure development terms Site ERM4b is available for development. Subject to the site being released for delivery it is anticipated that the site could be delivered within 12 months of all the required planning permissions being granted. The site would be delivered in a single phase. The HELAA confirms that site ERM4b is deliverable and developable.

Summary

5.21. Our technical evidence has confirmed that site ERM4b is suitable, available, sustainable, viable and deliverable. This technical evidence concurs with the Council's independent assessment of the site and the evidence base underpinning the DMP.

6. Matter 9a: Question 5

Where a site is to be released from the Green Belt, have the exceptional circumstances for releasing the site from the Green Belt been demonstrated? Would the release of the site prejudice or conflict with the purposes of the Green Belt?

- 6.1. Para 136 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances that are fully evidenced and justified through the preparation of a Local Plan. Core Strategy Policy CS3 defines the exceptional circumstances under which land may be release from the Green Belt.
- 6.2. In our assessment exceptional circumstances have been triggered for the following reasons:
- The DMP is required to allocate development sites to meet housing need defined in Core Strategy policy. Without the release of land from the Green Belt and subsequent delivery of housing on these sites the Borough's housing needs would not be met over the course of the plan period, nor would the Council be able to demonstrate a five year land supply.
 - Through the Core Strategy and DMP evidence base the Council have evidenced that sustainable housing allocations cannot be made, to meet overarching housing need requirements, on land within existing urban areas or on land within the open countryside.
 - Integral to the Council's site selection process was a comprehensive Green Belt Review exercise. The Green Belt Review identified land parcels capable of coming forward for development without conflicting with part 3b of Core Strategy Policy CS3 which requires the release of sites from the Green Belt to have limited or no conflict with the purposes and integrity of the Green Belt. These land parcels are the proposed SUE allocations.
- 6.3. Despite the Green Belt Review assessing site ERM4a and ERM4b as a single parcel of land it is clear that the release of the site will not conflict with Core Strategy Policy CS3 which requires the release of sites to have limited or no conflict with the purposes and integrity of the Green Belt.
- 6.4. We endorse the Council's decision to release site ERM4b from the Green Belt and the Council's methodology underpinning this decision.
- 6.5. Notwithstanding the above, as stated in our Matter 4 Statement, we do have concerns regarding the ranking of sites in in East of Redhill and East of Merstham in respect of their contribution to Green Belt purposes. Please see our Matters 4 Statement for further details.