
Examination Statement

East Surrey Hospital

Surrey & Sussex Healthcare NHS Trust

Reigate & Banstead Borough Council
Development Management Plan

Examination in Public

Examination Statement

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1. Introduction

- 1.1. This Examination Statement is submitted by Savills on behalf of Surrey & Sussex Healthcare NHS Trust (herein referred to as the Trust) in respect of the East Surrey Hospital campus (ESH).
- 1.2. Prior to the submission of the Development Management Plan (DMP) by Reigate & Banstead Borough Council (RBBC) to the Planning Inspectorate for examination, Savills submitted on behalf of the NHS Trust representations to the Regulation 19 consultation in February 2018. This representation was supported by additional evidence including:
 - Heritage Desk Based Assessment prepared by CgMs
 - Development Framework prepared by David Lock Associates
 - Landscape & Visual Baseline Appraisal by Davies Landscape Architects
 - Phase 1 Habitat Plan prepared by EAD Ecology
 - Transport and Movement Strategy by WSP
- 1.3. The NHS Trust is supportive of the submitted DMP and the allocation and release of the East Surrey Hospital Campus from the Green Belt for medical related and ancillary development under emerging Policy RED9.
- 1.4. The NHS Trust also wish to re-iterate their support for the development of a new Garden Village at Redhill Aerodrome and support the safeguarding of this site under emerging Policy MLS2. The NHS Trust submitted a representation to the Regulation 19 consultation of the Tandridge District Council Local Plan outlining this support which is included at **Appendix 1**.

2. Response to Inspector's Matters

- 2.1. The Trust has requested to appear at the hearing for Matter 4 Green Belt Review and this Statement predominantly focuses on these matters in respect of emerging Policy RED9. This Statement also includes statements in respect of Matter 11 Policy MLS2 Safeguarded Land for development beyond the plan period.

Matter 4 - Green Belt Review

ISSUE: Is there a need to review the Green Belt in the borough and is the approach taken justified, effective and consistent with national policy in the NPPF.

4a) General approach

Is the Green Belt review consistent with national policy in the NPPF and PPG's and with the policies in the Core Strategy?

- 2.2. The NPPF (2012) sets out at paragraph 83 that Green Belt boundaries should be established in Local Plans and should only be altered in Exceptional Circumstances through the preparation or review of the Local Plan. Paragraph 84 goes on to set out that when reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. Paragraph 85 sets out the criteria when defining boundaries:
- *“ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
 - *not include land which it is unnecessary to keep permanently open;*
 - *where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
 - *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
 - *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
 - *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*
- 2.3. In line with Policy CS3 of the adopted Core Strategy, the Council have undertaken a Green Belt Review to inform the DMP. Undertaking a Green Belt Review as part of the DMP is specifically outlined in Policy CS3.
- 2.4. The Green Belt Review is therefore consistent with national policy and guidance and the Core Strategy.

Is the methodology and the basis for assessing, selecting and rejecting sites appropriate, objective, consistent, and justified with robust evidence?

- 2.5. Given this statement is made in respect of ESH, this answer relates solely to the method of assessing this site.
- 2.6. The Trust supports the methodology of the Green Belt Review and its conclusions on ESH. The Green Belt Review concludes that exceptional circumstances are present to allow for the release of land from the Green Belt which is supported by the Trust.

Have all reasonable and realistic alternative sites been considered and given full reasons for selection/rejection?

- 2.7. Given this statement is made in respect of ESH, this answer relates solely to the method of assessing this site.
- 2.8. The Green Belt Review at paragraph 6.61 – 6.63 considers whether it would be possible to accommodate the development required at ESH outside of the Green Belt and at paragraph 6.64 – 6.69 considers whether development within the Green Belt is a more sustainable option. This concludes that whilst it may be possible to locate the development outside of the Green Belt, allowing ESH to expand on the existing site is “*significant more sustainable option*”. As outlined in the Trust’s representations to the Regulation 19 consultation it is imperative to the continued quality of care and enhanced of facilities available at the ESH that the Trust are able to expand.
- 2.9. Therefore the Trust therefore consider that all reasonable and realistic alternative sites have been considered in respect of ESH and the reasons for selection have been clearly given in appropriate detail.

Does the DMP clearly identify and demonstrate the exceptional circumstances necessary to justify amending the Green Belt boundaries and releasing land from the Green Belt?

- 2.10. Given this statement is made in respect of ESH, this answer relates solely to the method of assessing this site.
- 2.11. The Green Belt Review from paragraph 6.56 onwards outlines the assessment undertaken at ESH and the conclusions of this. This concludes that exceptional circumstances have been demonstrated to justify release of ESH from the Green Belt including:
- To meet the aims of the Core Strategy in respect of delivering improved health facilities and ensuring the health needs of the borough are met in a context of rising demand for services at ESH
 - Lack of alternative location within the urban area
 - Sustainability implications of spreading health services across multiple sites;
 - Expansion of ESH being the most sustainable option for development
 - Limited conflict with four out of five of the purposes of the Green Belt
- 2.12. The DMP evidence therefore demonstrates clear exceptional circumstances to justify amendments to the Green Belt at ESH.

Matter 11 Policy MLS2 - Safeguarded land for development beyond the plan period.

ISSUE: Whether there is a need to safeguard land and whether the policy is justified effective and consistent with national policy in the NPPF.

What is the background to the need to safeguard land for future development? Why is it necessary? Is this policy effective, justified and consistent with national policy and the Core Strategy?

- 2.13. The Trust strongly support the MLS2.
- 2.14. The future development at Redhill Aerodrome supports the Hospital site and will provide a number of benefits to ESH including:
- The provision of key worker housing for staff at all levels which will ensure the Trust are able to attract and retain sufficient staff at all levels;
 - The provision of the new junction onto the M23, east west link road and link to ESH will improve access to the site for emergency vehicles and those using the hospital facilities;
 - Provision of onsite primary healthcare services to ease pressure on existing services at ESH;
 - Promoting Healthy Town principles to increase the health and wellbeing of residents and reducing pressure on existing healthcare services
- 2.15. This is consistent with the Core Strategy aims to provide good access to health services, promoting healthy lifestyle choices and overall health of residents.

Does the DMP clearly identify and demonstrate the exceptional circumstances necessary to justify releasing land from the Green Belt to become safeguarded land for development beyond the plan period?

- 2.16. The DMP has provided evidence in the Sustainability Appraisal (updated May 2018), Green Belt Review (October 2017) and Safeguarded Land (December 2017) document which justify the safeguarding of the land. As set out above the development at Redhill Aerodrome would provide significant benefits to the Trust and ESH as outlined above at paragraph 2.14.

What sites were considered and why was Redhill Aerodrome selected and others rejected?

- 2.17. No other site within the Borough can provide the scale of benefits that the proposals at Redhill Aerodrome will facilitate at ESH, particularly relating to access to the Hospital in both emergency and non-emergency situations. The development would also provide a significant amount of key worker accommodation which is very important to the Trust. Additional key worker accommodation in close proximity to ESH will assist in ensuring that NHS staff can find affordable accommodation in the local area. Retention of existing staff and attracting new staff if a key challenge for the Trust and therefore this is a key benefit.



Is the safeguarding of the Redhill Aerodrome site at this time justified by the evidence in light of the uncertainties with regard to the Garden Village proposed by Tandridge DC and other site and planning related constraints?

- 2.18. The Trust have outlined their support for Redhill Aerodrome as a Garden Village location to TDC, please see Appendix 1.

Should the site remain as Green Belt and be considered further in a future review of the local plan?

- 2.19. The Trust have no comment on this question.



3. Conclusion

- 3.1. As set out in this Statement the Trust support the DMP.
- 3.2. In respect of Matter 4, the Green Belt Review is consistent with national policy and the adopted Core Strategy. The Green Belt Review methodology is considered to be robust and the Trust are supportive of its findings in respect of ESH.
- 3.3. RBBC have identified exceptional circumstances which justify the release of ESH from the Green Belt under Emerging Policy RED9.
- 3.4. In respect of Matter 11, the Trust support the safeguarding of land under emerging Policy MLS2. The potential future development of the Land at Redhill Aerodrome would provide significant benefits to ESH. The safeguarding of land will secure flexibility for the site to be delivered jointly by RBBC and TDC and the Trust have expressed their support for Redhill Aerodrome to TDC through the Regulation 19 consultation.

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Appendices

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9 August 2018

Ref MW/IM

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Dear Sirs

TANDRIDGE LOCAL PLAN – REGULATION 19 CONSULTATION

I write to you on behalf of the Surrey and Sussex Healthcare NHS Trust in regard to the East Surrey hospital campus.

In the context of Tandridge District, the hospital serves a significant number of residents. In 2016 the Trust provided care for a total of 529,176 individualised patient episodes 18% of which live within Tandridge District at 92,896 cases. This represents the third highest usage out of the local authorities whose residents use the hospital for emergency and non-emergency healthcare services. The hospital is therefore a critical service to the district.

In addition the hospital has wider regional significance serving communities within RBBC, Crawley Borough, Horsham District, Mole Valley and Croydon. This includes medical emergencies where the hospital is often used due to its proximity to strategic road network. The hospital had 33,070 emergency inpatient and 96,149 A&E cases in 2016. As the closest Accident and Emergency (A&E) centre to London Gatwick Airport, East Surrey Hospital is placed on standby when a serious aviation incident is expected. East Surrey Hospital also accommodates travellers with diseases not typically encountered in the UK arriving at Gatwick Airport.

Dr Ed Cetti, Chief of Cancer and Diagnostics at the Trust, attended and spoke at the Planning Policy Committee on 3rd July and set out the Trust's support of the development of the new Redhill Aerodrome Garden Community. This representation supports the statement made by Dr Cetti in respect of this development.

The Trust supports the development as it will deliver a number of benefits critical to East Surrey Hospital and the wider local NHS network. These will include:

- 400-500 key worker homes – these will be a mixture in size from one to four bedrooms;
- A primary care hub including diagnostics to be located in the new district centre;
- A mixture of homes including bungalows and assisted living;
- A new M23 junction and M23-A23 link road providing vastly improved access to East Surrey Hospital.

Key Benefits of the Redhill Garden Community

Key Worker Housing

The development will assist in alleviating one of the biggest issue facing the NHS which is staffing across professional and non-professional staff and this is directly affected by ability to live near the hospital. The hospital currently employs over 4,000 staff and many of these people will struggle to afford homes in what is one of the most affluent areas of the country. The affordability ratios of both Reigate and Banstead Borough Council (RBBC) and Tandridge District Council (TDC) demonstrate this unaffordability with house prices 11 and 14 times above average earnings respectively.

The Redhill Aerodrome project will help with this by providing a significant number of key-worker homes within close proximity to the hospital campus. We believe this will significantly help with recruitment and in turn help us to maintain and enhance the quality of care provided.

New Services and Facilities

If a new garden village is to be created it needs to have local healthcare services that reflect the needs of that community. The Redhill Aerodrome Garden Village will provide a primary care hub which is focussed on the needs of that community. This will be fully supported by diagnostics such as x-ray and will help to keep patients at home longer as well as supporting their discharge.

Another key element in light of the national trend in ageing population is ensuring that the elderly can stay living in appropriate dwellings as long as possible. We see the new community as a key part of the NHS Healthy Towns initiative and will work with the developer on matters such as tele-medicine and tele-health, as well as helping to ensure that the full range of housing including bungalows is part of the scheme. This will allow the Trust to support patients at home longer than is currently the case and should help reduce the demand in emergency admissions that the NHS is experiencing.

The proposals will promote long term healthier lifestyles by creating new attractive open space and recreational area including walking and cycling trails. This will encourage residents to engage with physical exercise as part of their daily lives, improving overall health and wellbeing.

M23 Junction

The other outstanding reason that the Trust supports the Redhill Garden Village is the proposed new road link road and junction onto the M23. This will significantly improve access to the hospital, which will impact on the time it takes ambulances to reach the hospital improving a patient's chance of a better outcome due quicker access to treatment. The improved ambulance times would be hugely beneficial if there were a major incident on the M23 motorway or at Gatwick Airport.

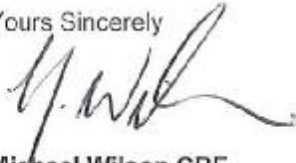
This will also provide benefits for other patients and visitors who are currently affected by congestion around the Hospital.

Conclusion

The Tandridge Local Plan in its current form does not support East Surrey Hospital. Whilst this is not within the district it is a vital healthcare service, which from statistical evidence, is widely used by Tandridge residents. The Regulation 19 Local Plan in its current form, does not support the ongoing provision of services at East Surrey Hospital or provide any infrastructure or key worker housing which will enable the Trust to further improve facilities and care provision. In its current form the Trust cannot support the emerging Local Plan.

We would urge Tandridge District Council to reconsider their decision to direct a new garden village to South Godstone and to ensure that all of the wider ranging local and regional benefits of Redhill Garden Village are taken into account. On this basis, the Council should allocate Redhill Garden Village within the emerging Local Plan.

Yours Sincerely



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