

SD14

RBBC Submission DMP

**Town Centre, Urban and
Opportunity Site Allocations:**

**Proposed Site Density
Analysis for Housing Sites**



1. Introduction and summary of findings

- 1.1 This is one of a series of documents to support the Borough Council as it presents its Development Management Development Plan Document (the DMP) for examination. It clarifies the logic for the densities of the different town centre, urban and opportunity site allocations in the DMP and specifically responds to the Inspector's MIQ¹.
- 1.2 In summary, the Council has allocated housing in the urban and opportunity site allocations at densities of between 15 and 400 dwellings per hectare (dph). The densities broadly reflect the contexts of the locations where they are situated and the mix of urban and rural in the borough. Special attention has been given to sites in urban parts of the borough in conservation areas or close to heritage assets. A detailed paper covering these has also been prepared. A further paper will be prepared for site allocations ERM4a, 4b and 5 to demonstrate that allocations that are close to the Surrey Hills Area of Outstanding Natural Beauty are consistent with national policy in that respect.
- 1.3 The Council asserts that the range of densities associated with its town centre, urban and opportunity site allocations accords with national policy and that the assumptions are reasonable in all respects.

2. Planning Policy

- 2.1 Since the production of the first NPPF in 2012, local planning authorities have been free to set their own densities for housing development. Nonetheless, the preparation of site allocations needs to take account of other aspects in national policy. These include the need to promote sustainable development and at the same time deliver other aspects of Government policy including: making effective use of land; achieving well-designed places; meeting the challenge of climate change, flooding and coastal change and conserving and enhancing the natural environment; and conserving and enhancing the historic environment.
- 2.2 The adopted Reigate and Banstead Local Plan: Core Strategy (CS) has made provision for at least 6,900 homes on that basis.

3. Calculating density

- 3.1 Housing density can be measured in one of three ways:

¹ Matter 5(a) Q2.

- 3.2 **Number of habitable rooms per hectare** - this measure is based upon the total number of habitable rooms provided by homes on a site. A habitable room is defined as 'Any room used or intended to be used for sleeping, cooking, living or eating purposes'. Enclosed spaces such as bath or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition. This method is used in London to facilitate higher density urban and to reflect the larger proportion of studio and one bedroom (non family) homes.
- 3.3 **Quantity of floor area (in square metres)** This measure is based upon the total amount of floor area provided by homes on a site. This is a more precise method of calculating density as the quantity can be expressed in a variety of small, medium or large sized homes. This is the most commonly adopted method in other EU member states such as Germany.
- 3.4 **Number of dwellings per hectare (dph).** This measure is based upon the number of homes on a site. This method does not distinguish between large or small homes. However, dwellings per hectare (dph) is the most widely used density measure nationwide and was specifically used in the former PPG 3. For this reason dph will be the density measure used in this document and for the purposes of the DMP.

4. Methodology

4.1 The proposed density for each of the urban and opportunity site allocations are set out and analysed in Section 5 below.

4.2 The dph for each site has been calculated using the standard methodology:

$$\text{Dwellings per hectare (dph)} = \frac{\text{number of proposed dwellings (dwellings)}}{\text{residential site area (ha)}}$$

4.3 Additional indicators have also been considered when assessing whether the proposed output dph is appropriate and reflective of local circumstances. These indicators include: median ward density; the average height of surrounding buildings; and any relevant local planning applications (granted or under determination).

4.4 The 'ward median density' dph has been calculated using data from planning permissions granted for new residential developments in each electoral ward between the years 2007 and 2018. Although this calculation provides an indicative insight into the density fabric at a local level, there are limitations in the output given the geographical size of political wards. Therefore the ward

median density results have limited relevance in assessing whether the proposed site density is appropriate.

- 4.5 Where a site's proposed density has fallen significantly below the ward median density, we have analysed the buildings within the immediate context of the site and assessed local planning permission data from the past 10 years to assess whether or not the proposed density is considered appropriate or not, given the context of its surroundings. These considerations are set out site by site in Section 5.
- 4.6 Furthermore, the accessibility score for each individual site has been calculated for each site using the methodology set out in DMP Policy TAP1 (Annex 4) and used as additional criterion to assess whether the proposed dph is appropriate.
- 4.7 In accordance with NPPF policy, further analysis of the site allocations within the context of local heritage constraints has been set out in an accompanying Heritage Impact Assessment.

5. Site Density Analysis

5.1 BAN2

BAN2 comprises three land parcels (A, B and C) with half of parcel C falling within Banstead's village centre boundary. The site is aligned by a number of buildings ranging between two and three storeys (predominantly residential houses or mixed-use ground floor retail with residential above). Banstead High Street is located 60m to the east of the wider site. The wider site benefits from a 'medium' accessibility score (6 out of 15 points). Given that Policy BAN2 does not specify the number of dwellings to be sought within the site, an appropriate and reflective of local circumstances density has not been calculated for this site at this stage.

5.2 BAN3

BAN3 is an urban site located 100m outside of Banstead's village centre boundary and benefits from a 'medium' accessibility score (6 out of 15 points). The site is aligned by three storey residential blocks to the north and south, two storey dwellings to the east, and Lady Neville Recreation Ground to the west. The site comprises a site area of 0.51ha and is promoted to deliver 15 dwellings, equating to a density of 29 dph, which accords with the median ward density (Banstead Village) of 30 dph for non-village-centre sites. Given

that the site benefits from a 'village centre' location (DMP equivalent of a town centre) and 'medium' accessibility score (6 out of 15 points); the proposed density of 29 dph is considered to be both appropriate and reflective of local circumstances.

5.3 **BAN1**

BAN1 is an opportunity site, comprising a site area of 0.44ha. The site is located on Banstead High Street within the village centre boundary and is aligned by buildings ranging between 2 and 3 storeys in height (predominantly ground floor retail units with residential above). Policy BAN1 promotes the site to deliver approximately 40 dwellings, equating to a density of 91 dph, which accords with the ward median density (Banstead Village) of 130 dph for town centre sites. Furthermore, a number of residential developments have been delivered in Banstead village centre over the past ten years at higher densities ranging between 100-200dph. Given the site's village centre location, 'medium' accessibility rating (6 out of 15) and surrounding area context; the proposed density is considered to be both appropriate and reflective of local circumstances.

5.4 **RTC2**

RTC2 is a town centre allocation located in the Redhill West ward and comprises a site area of 0.08ha. The site benefits from a 'high' accessibility score of 15 out of 15, given its location 320m to the west of Redhill Station. Policy RTC2 promotes the delivery of 32 dwellings within the site, equating to a density of 400dph. The ward median density for Redhill West town centre sites is 73dph, which is considered to be a lower than average median for a town centre. To give this assumption context, the ward boundary divides Redhill town centre into two halves (Redhill West and Redhill East). The ward median density for Redhill East is calculated at 263 dph, which we support as a more accurate representation of the average residential density within the Redhill town centre context.

The site is surrounded by a range of high density buildings, predominantly ranging between 5-7 storeys in height. A five-storey residential development, Queensgate, aligns the site to the east for which planning permission was granted in 2014 to deliver 64 dwellings at 457 dph (LPA Ref: 14/01331/OUT). Beyond this, Queensway (280m to the north east of the site) was granted permission in 2007 to deliver 126 units at a density of 381dph and 26-28 Station Road (220m to the east of the site) was granted permission in 2014 to

deliver 14 dwellings at a density of 466 dph. Given the site's town centre location, 'high' accessibility score and surrounding area context, the proposed density is considered to be appropriate. Furthermore, since the DMP was submitted to PINS in May 2018, a full planning application has been submitted to the Council seeking to redevelop the full extent of this site to deliver 32 dwellings at a density of 400dph (LPA Ref: 18/01158/F). The application is currently being determined.

5.5 **RTC6**

RTC6 is a 0.76ha site located within Redhill town centre boundary. The existing site comprises a surface level car park and currently accommodates a number of HGVs. A four storey residential block aligns the site to the north with a large five storey office block aligning the site to the east. Dwellings at two storeys in height are located to the south of the site. A number of planning applications have been granted permission in the past ten years to deliver high density residential developments within Redhill town centre including: Queensway (230m south of the site) delivering 126 units at a density of 381dph; 26-28 Station Road (320m to the south east of the site) delivering 14 dwellings at a density of 466 dph; and Knowles House (450m to south of the site) delivering 64 dwellings at a density 457 dph.

Policy RTC6 promotes the delivery up to 60 dwellings, equating to a density of 79 dph. This proposed density is higher than the ward median density for Redhill West town centre sites which is 73 dph. As set out above in Paragraph 5.4, it is important to highlight that 73 dph is considered a low ward median density calculation for a primary town centre. The ward median density for Redhill East town centre is calculated at 263 dph, which we support as a more accurate representation of the average residential density within the Redhill town centre context. Given the site's town centre location, 'high' accessibility score (13 out of 15 points) and surrounding area context; the proposed density of 79 dph is considered to be both appropriate and reflective of local circumstances.

5.6 **RTC4**

RTC4 is an urban site allocation located 75m to the east of Redhill town centre boundary in the Redhill East ward. The site is urban in character, with a large 3-storey post office sorting office located to the south west of the site and a number of high density residential apartment blocks to the south, reaching three to four storeys in height. Furthermore, a number of planning applications within an 800m radius of the site have been granted permission

within the past ten years to deliver residential accommodation at a density ranging between 200 and 492 dph.

The site comprises a total area of 1.47ha and is promoted to deliver 110 dwellings, equating to a density of 75 dph. Although this proposed density is higher than the ward median density for urban land in Redhill East, which is 65 dph, given the site's proximity to the town centre (75m) it is important to highlight that the ward median density within town centre sites (Redhill East) is 263 dph. The site benefits from a 'high' accessibility score of 15 out of 15 points, located 75m to the east of Redhill Train Station. Therefore, given the site's close proximity to the town centre, 'high' accessibility score and surrounding area context; the suggested density is considered to be both appropriate and reflective of local circumstances.

5.7 **RTC5**

RTC5 is an urban site allocation, which aligns the south western boundary of Redhill Town Centre. The site is urban in character and is aligned by 4-5 storey buildings to the north and east, two storey dwellings to the south and four storey apartment blocks to the west. The site benefits from a 'high' accessibility score (13 out of 15 points). A number of sites have been granted planning permission within the past ten years within the site's local surrounding to deliver high density residential development including: Queensgate (200m east) to deliver 64 dwellings at a density of 457 dph; Queensway (220m north-east) to deliver 126 units at a density of 381dph; and 26-28 Station Road (300m east) was granted permission in 2014 to deliver 14 dwellings at a density of 466 dph.

The site comprises a total area of 0.22ha and is promoted to deliver approximately 20 dwellings, equating to a density of 91 dph. The ward median density (Redhill West) for sites outside of the town centre boundary is 33 dph. However, given that the site immediately adjoins the Redhill Town Centre boundary, it is considered that the site's proposed density should also be assessed in terms of appropriateness in relation to the context of the wider town centre. Given the number of residential developments within Redhill town centre ranging in density between 200-466 dph, the proposed site density of 91 dph is considered to be both appropriate and reflective of local circumstances.

5.8 RED1

RED1 is an urban site allocation in Redhill East, comprising a site area of 1.3ha. The site is located 510m south of the local centre boundary and 1.1km to the north of Redhill town centre boundary. Although the site has a 'low' accessibility score (4 out of 15 points) according to emerging policy TAP1 standards, the site is well-supported by a number of local bus connections. Policy RED1 promotes the delivery of approximately 60 dwellings within the site, equating to a density of 46 dph, which accords with the ward median density of 40 dph. The site forms the final parcel of the locally significant 'Watercolour' regeneration scheme to be brought forward. The site is aligned by a number of four-storey residential blocks to the south and east of the site and railway lines to the north and west. Therefore, the proposed density is considered to be both appropriate and reflective of local circumstances.

5.9 RED2

RED2 is an urban site allocation in the ward of Merstham, comprising a total area of 0.2ha. The site is located to the south of Merstham High Street and aligns the north-eastern local centre boundary. The site is located 170m north-west of Merstham train station and benefits from a 'high' accessibility score (11 out of 15 points). The existing building within the site (Bellway House) comprises three storeys of office accommodation which would be demolished if the site is brought forward for redevelopment. The A23 aligns the western boundary of the site, with two storey dwellings to the east. A large car park attached to a public house named 'The Feathers' aligns the southern boundary of the site.

Policy RED2 promotes the site to deliver up to 30 dwellings, equating to a density of 150 dph. Although the ward median density has been calculated at 32 dph, a number of residential developments have been granted permission in the past five years to deliver densities ranging between 100 dph and 200 dph within the local context. In 2015, permission was granted (LPA Ref: 15/00914/PJP) for a change of use application at 13 Station Road (130m south of the site) to deliver 11 dwellings at a density of 149 dph and in 2017 permission was granted to convert 229 London Road (830m north of the site) into 9 units at a density of 180 dph. Therefore, given the site's 'high' accessibility score and surrounding area context; the proposed density of 150dph is considered to be both appropriate and reflective of local circumstances.

5.10 **RED4**

RED4 is an urban site in the ward of Merstham. The site comprises a total area of 0.33ha and is promoted to deliver up to 10 dwellings, equating to a density of 30 dph, which accords with the ward median density of 32 dph. The site is located 260m north of Merstham local centre boundary and is supported by a parade of local convenience stores 90m to the south of the site. The site benefits from a 'medium' accessibility score, located 800m to the east of Merstham train station. It is aligned to the north, west and east by two storey dwellings in a crescent formation delivering a mix of semi-detached and terraced properties. A number of residential blocks align the site to the south, reaching three storeys in height. Given the site's 'medium' accessibility score (9 points out of 15), urban location and ward median density of 28 dph; the proposed density is considered to be both appropriate and reflective of local circumstances.

5.11 **RED5**

RED5 is an urban site located in the ward of Merstham, comprising a total area of 0.26ha. RED5 promotes the site to deliver approximately 10 dwellings, equating to a density of 38dph. The ward median density is 32 dph. The site is located 90m to the south of Merstham local centre boundary and benefits from a 'medium' accessibility score (6 out of 15 points) given its location 965m walking distance to the north-west of the site. Community facilities (one and two storeys units) align the site to the north and south and two-storey dwellings align to site to the east and west. Beyond the site's immediate surroundings, there a number of higher density dwellings within blocks reaching four to six storeys in height which are located 90m to the north on Portland Drive. A number of residential developments have been granted planning permission within the ward during the past five years to deliver densities ranging between 100 dph and 200 dph within the local context. Given the site's 'medium' accessibility score (6 points out of 15), urban location and ward median density of 32 dph; the proposed density is considered to be appropriate and reflective of local circumstances.

5.12 **RED6**

RED6 is an urban site located in the ward of Merstham. The site comprises a total area of 1.97ha and is promoted to deliver approximately 30 dwellings, equating to a density of 15 dph, which accords with the ward median density of 32 dph. The site is located 800m to the north of Merstham local centre boundary and benefits from a 'medium' accessibility score of 6 out of 15 points, located 1.5km from Merstham train station. The existing building within

the site is three storeys in height and aligned by two storey dwellings to the south and west. Fields align the property to the north and east, which form part of a land parcel being promoted as a sustainable urban extension site in the DMP (Policy ERM5). Given the site's 'medium' accessibility score (6 points out of 15), urban location and ward median density of 32 dph; the proposed density is considered to be both appropriate and reflective of local circumstances.

5.13 **RED8**

RED8 is an urban site in Redhill East ward, located just one metre south of the Redhill town centre boundary, opposite a designated local centre boundary and adjacent to an allocated retail warehouse area. The site is aligned by a railway line to the north and east, large warehouse units and a three-storey office building to the south and opposite a parade of local retail units with residential uses above reaching two storeys in height. Just beyond the site to the north, divided by a railway bridge, is Redhill town centre which comprises a number of high density buildings ranging between five and seven storeys in height. A number of high density residential developments have been granted permission within close proximity to the site during the past five years including the Liquid and Envy site (300m north) which was granted permission in 2016 to deliver 133 dwellings at 493 dph.

The site comprises a site area of 1.94ha and is promoted to deliver approximately 150 dwellings, equating to a density of 77 dph, a higher proposed density than the ward median for non-town centre sites in Redhill East which is 65 dph. However, given the site's proximity to the town centre (1m) it is important to highlight that the ward median density for sites within town centres in Redhill East is 263 dph. Therefore, given the site's 'high' accessibility score (13 points out of 15), proximity to the town centre (1m) and surrounding area context of 7+ storey buildings at 200-466 dph; the proposed density of 77 dph is considered to be both appropriate and reflective of local circumstances.

5.14 **REI2**

REI2 is located in Reigate town centre. The site is aligned to the north and west by Reigate and Banstead Town Hall, to the south by a four storey office block, to the east by a three storey residential block. Reigate High Street is located 190m south of the site and Reigate train station is located 400m to the north. The surrounding area typically comprises three to four storey buildings in office and residential occupation. The site measures 0.25ha and is promoted to deliver approximately 30 dwellings, equating to 120 dph which

accords with the ward median density of 154 dph. Therefore, given the site's town centre location, 'high' accessibility score (13 out of 15 points) and ward median density of 154 dph; the proposed density is considered to be both appropriate and reflective of local circumstances.

5.15 **REI1**

REI1 is an opportunity site in Reigate Town Centre. The site is aligned to the north and west by three storey buildings in office use and three storey residential blocks to the east (Bancroft Court) and south (Roebuck Close). A four-storey car park is located to the north western corner of the site. Policy REI1 comprises a site area of 0.22ha and is promoted to deliver approximately 25 dwellings, equating to 114 dph which accords with the ward median density of 154 dph. Given the site's town centre location, ward median density and surrounding site context; the proposed density is considered to be both appropriate and reflective of local circumstances.

5.16 **REI3**

REI3 is a 2.4ha opportunity site allocation, located 390m north of Reigate's town centre boundary. The existing site comprises a series of two and three storey industrial buildings, forming the wider Albert Road North Industrial Estate. The site is aligned by a railway track to the north, woodland to the west and two storey dwellings to the east. Immediately to the south of the site is a three-storey residential development in a terrace formation. Planning permission was granted for this development in 2013 to deliver 14 dwellings at a density of 84 dph. Policy REI3 promotes the site to delivery of up to 50 dwellings, equating to 21 dph, which accords with the ward median density of 40 dph. Given the site's proximity to the town centre, 'medium' accessibility score (8 out of 15 points) and surrounding area context; the proposed density is considered to be both appropriate and reflective of local circumstances.

5.17 **HOR1**

HOR1 is located within Horley town centre boundary. The site is urban in character, with a railway line aligning the site to the east, a parade to the north comprising three to five storey buildings (ground floor retail with residential above) forming Horley High Street, low density industrial units to the west and a one storey former Victorian engine shed in retail use to the south.

A number of planning permissions have been granted by the Council in the past ten years to deliver high density residential development in Horley town centre, with densities ranging between 140dph– 307dph. Significantly, in 2014 planning permission was granted (LPA Refs: 14/02647/PP and LPA Ref: 14/00317/F) for the delivery of: 38 units in Consort House (220m north of the site) at a density of 190 dph; and 43 units in Saxley Court (260m west of the site) at a density of 307 dph.

Policy HOR1 comprises a total site area of 0.28ha and benefits from a 'high' accessibility score (11 out of 15 points). The site is promoted to deliver approximately 40 dwellings, equating to 143 dph. This is a higher density than the ward median density for town centre sites in Horley Central which is 116 dph. However, given the surrounding context of Horley town centre and the number of residential developments being delivered within the site's surrounding context at densities between 140dph and 307dph; the proposed density of 143 dph is considered to be both appropriate and reflective of local circumstances.

5.18 **HOR3**

HOR3 is a 0.15ha site located within the Horley town centre boundary and benefits from a 'high' accessibility score (11 out of 15 points). The site is urban in character and is aligned by two and three storey buildings to the north, east and west of the site. Four storey residential blocks align the site to the south. Victoria Road, located to the immediate east of the site boundary has been subject to a significant number of residential developments during the past ten years including: Newman House delivering 90 dwellings at density of 136dph; 96-100 Victoria Road delivering 19 units at 136 dph; 68-70 Victoria Road delivering 15 units at 150 dph; Land at 71 Victoria Road delivering 62 dwellings at 168 dph; and 121-129 Victoria Road delivering 43 units at 307 dph.

Policy HOR3 comprises a total site area of 0.15ha and is promoted to deliver approximately 20 dwellings, equating to 133 dph. This is a higher density than the ward median density for town centre sites in Horley Central which is 116 dph. However, given the surrounding area context (namely the aforementioned Victoria Road residential delivery) and the number of

residential developments being delivered within the site's wider town centre context at densities between 140dph and 307dph; the proposed density of 133 dph is considered to be both appropriate and reflective of local circumstances.

5.19 **HOR5**

HOR5 is located on Victoria Road within Horley town centre boundary and benefits from a 'high' accessibility score (11 out of 15 points). The site is urban in character and is aligned by: a two-storey superstore to the east; opportunity site HOR7 to the south which currently comprises a two-storey building; a two-storey medical centre to the west; and two-storey dwellings to the north. The 0.29ha site is promoted to deliver approximately 35 dwellings, equating to 121 dph which is slightly higher than the ward median density for Horley Central (116 dph). However as set out in Paragraph 5.18, given the context of the wider Victoria Road recent residential development delivering a range of densities between 140dph and 307dph; the proposed site density of 121dph is considered to be both appropriate and reflective of local circumstances. Furthermore, an outline application seeking to deliver a maximum of 40 units within the site at a residential density of 140dph is currently awaiting determination (LPA Ref: 18/00222/OUT).

5.20 **HOR8**

HOR8 comprises a site area of 1.1ha and is promoted to deliver approximately 45 dwellings, equating to a density of 40dph. However, the site is now due to be refurbished for hotel use in Spring 2019. Therefore, we have not included density calculations for this site at this stage.

5.21 **HOR10**

HOR10 is an urban site allocation located 450m north-west of Horley town centre. The existing site comprises a number of one storey units in leisure use. Although the site is surrounded to the north, south and west by two-storey dwellings, the site is in urban in character given the presence of Brighton Road (A217) which aligns the parcel to the east. The site benefits from a 'medium' accessibility score (8 out of 15 points). Policy HOR10 promotes the 1.0ha site to deliver up to 20 dwellings, equating to 20 dph, which accords with the ward median density of 25dph. Given the site's proximity to the town centre, a 'medium' accessibility score and surrounding area context, the proposed density is considered to be both appropriate and reflective of local circumstances.

5.22 HOR6

HOR6 is an opportunity site with a 'high' accessibility score (11 out of 15 points) located on Victoria Road within Horley town centre. The existing site comprises a three-storey office block with a superstore unit at ground floor level. The site is aligned by: a large surface level car park to the north; a part two, part three storey retail unit to the east; and two storey retail units to the west. A 62-unit residential development (Bellway's Sovereign Place) aligns the site to the south, on the opposite side of Victoria Road, which was granted permission in 2015 to deliver 56 dwellings at 168 dph. Furthermore, Russell Square is located 45m to the south of the site. This high density residential development was granted permission in 2012 to deliver 90 dwellings at 136 dph. Therefore, the site is surrounded by a number of high density residential developments.

Policy HOR6 comprises a total area of 0.25 ha and is promoted to deliver approximately 25 dwellings. This equates to 100 dph, which accords with the ward median density (Horley Central) of 116 dph. Therefore, given the site's town centre location, 'high' accessibility score and surrounding area context; the proposed density of 100 dph is considered to be both appropriate and reflective of local circumstances.

5.23 HOR7

HOR7 is an urban opportunity site located on Victoria Road with a 'high' accessibility score (11 out of 15 points). The site is aligned by Horley Library (Policy HOR5) to the north, two and three storey dwellings to the east, and a large car park to the south. Saxley Court aligns the site to the west, for which planning permission was granted in 2014 (LPA Ref: 14/00317/F) to deliver 43 dwellings at 307 dph. Policy HOR7 comprises a site area of 0.30 ha and is promoted to deliver approximately 30 dwellings, equating to a density of 100 dph which accords with the ward median density (Horley Central) of 116 dph. Given the site's town centre location, 'high' accessibility score and surrounding area context; the proposed site density at 100 dph is considered to be both appropriate and reflective of local circumstances.

6. Conclusion

- 6.1 This analysis has demonstrated that the proposed density of each of the promoted 'Town Centre', 'Urban' and 'Opportunity' site allocations in RBBC's

submission DMP are appropriate and reflective of local circumstances, given the densities and heights of the surrounding area context. The dph for each of the sites has been calculated and assessed in accordance with the site's accessibility rating and surrounding context, in accordance with adopted and emerging local policies.