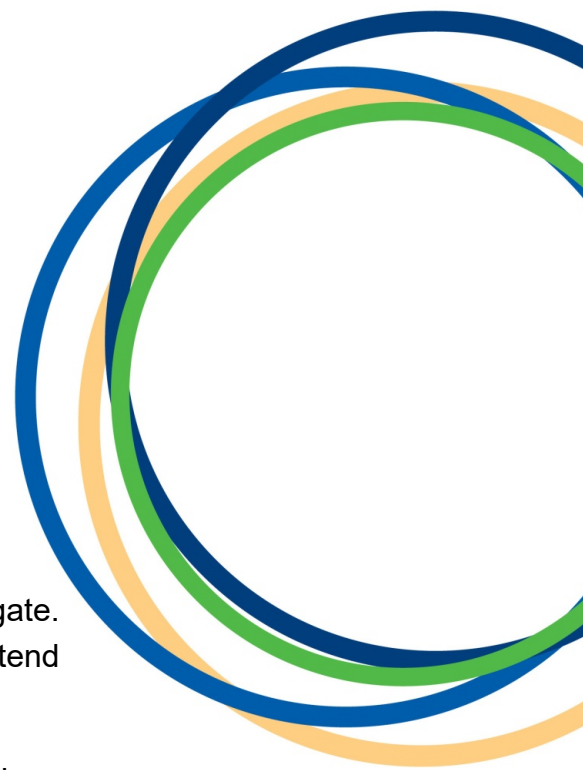


Agenda

Council



Thursday, 28 March 2024 at 7.30 pm

New Council Chamber, Town Hall, Reigate



Members will assemble at the Town Hall, Reigate. Members of the public and Officers may attend remotely.



Members of the public may observe the proceedings live on the Council's [website](#).

Members of Reigate and Banstead Borough Council are respectfully summoned to attend a meeting of the Borough Council on Thursday, 28 March 2024 at 7.30 pm.

Prior to the commencement of the meeting, prayers will be said by the Mayor's Chaplain

Mari Roberts-Wood
Managing Director

For enquiries regarding this agenda;

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Published 20 March 2024

Reigate & Banstead
BOROUGH COUNCIL
Banstead | Horley | Redhill | Reigate

1. Minutes (Pages 5 - 16)

To sign the Minutes of the meeting of the Council held on 20 February 2024.

2. Apologies for absence

To receive any apologies for absence.

3. Declarations of interest

To receive any declarations of interest.

4. Urgent business

To consider any urgent business.

5. Public questions (Pages 17 - 20)

To consider any questions received from members of the public under Council Procedure Rule 2.14.

6. Questions by Members

To consider any questions received from Members of the Council under Council Procedure Rule 2.15.

7. Recommendations

To receive and consider the recommendations of the Council's Executive, Committees and Sub-Committees for decision, including:

The meeting of the Executive held on 21 March 2024.

a) Treasury Management Strategy 2024/25 (Pages 21 - 70)

The minute of the Executive's consideration of this item is to follow.

Related Committee agenda, reports and minutes are available [here](#).

b) Local Plan (Core Strategy) Review and Statement of Community Involvement (Pages 71 - 252)

The minute of the Executive's consideration of this item is to follow.

Related Committee agenda, reports and minutes are available [here](#).

8. Audit Committee Annual Report 2023/24 and Forward Work Programme 2024/25 (Pages 253 - 270)

To receive the Audit Committee Annual Report for 2023/24 and Forward Work Programme for 2024/25.

9. Overview and Scrutiny Annual Report 2023/24 (Pages 271 - 284)

To receive the Annual Report of the Overview & Scrutiny Committee for 2023/24.

10. Overview and Scrutiny Proposed Annual Work Programme 2024/25 (Pages 285 - 294)

To agree an Overview & Scrutiny Work Programme for 2024/25.

11. Statements

To receive any statement from the Leader of the Council, Members of the Executive, Chairmen of Committees or the Managing Director.

12. Changes to Committee Appointments (Pages 295 - 302)

To approve changes to Committee appointments.

13. Leader's announcements

To receive any announcements by the Leader of the Council.

14. Mayor's announcements

To receive any announcements from the Mayor.



Our meetings

As we would all appreciate, our meetings will be conducted in a spirit of mutual respect and trust, working together for the benefit of our Community and the Council, and in accordance with our Member Code of Conduct. Courtesy will be shown to all those taking part.



Streaming of meetings

Meetings are broadcast live on the internet and are available to view online for six months. In attending any meeting, you are recognising that you may be filmed and consent to the live stream being broadcast online, and available for others to view.



Accessibility

The Council's agenda and minutes are provided in English. However, the Council also embraces its duty to anticipate the need to provide documents in different formats, such as audio, large print or in other languages. The Council will provide such formats where a need is identified prior to publication or on request.



Notice is given of the intention to hold any part of this meeting in private for consideration of any reports containing "exempt" information, which will be marked accordingly.

Minutes of a meeting of the **Council** held at the **New Council Chamber - Town Hall, Reigate** on **Tuesday, 20 February 2024 at 7.30 pm.**

Present: Councillors E. Humphreys (Mayor) and R. Biggs (Leader); J. Baker (Deputy Mayor), V. H. Lewanski (Deputy Leader), G. Adamson, R. H. Ashford, H. Avery, M. S. Blacker, J. S. Bray, G. Buttironi, P. Chandler, V. Chester, Z. Cooper, J. Dwight, M. Elbourne, J. C. S. Essex, K. Fairhurst, B. Green, P. Harp, N. D. Harrison, G. Hinton, J. Hudson, F. Kelly, S. Khan, A. King, J. P. King, S. A. Kulka, R. Michalowski, N. C. Moses, C. M. Neame, S. Parnall, A. Proudfoot, R. Ritter, K. Sachdeva, S. Sinden, M. Smith, C. Stevens, M. Tary, J. Thorne and S. T. Walsh

Attended remotely: Councillors J. Booton

Visiting Members present:

58 Minutes

RESOLVED that the Minutes of the Extraordinary meeting of Council held on 18 January 2024 be approved as a correct record and signed.

59 Apologies for absence

Apologies for absence were given by Councillor Booton, Torra, Harper, McKenna, Thompson.

60 Declarations of interest

There were none.

61 Urgent business

There were none.

62 Questions by Members

Twelve questions with notice were received from Members of Council. One was additional and therefore, in accordance with Procedure Rule 2.15.8, was to receive a written response following the meeting with 11 receiving responses at the meeting.

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Councillor Torra gave her apologies to the meeting. Councillor Proudfoot read out her question on her behalf.

Verbal responses given at the meeting			
	Question by	To be answered by	Subject
1.	Councillor Essex	Councillor (A) King, the Executive Member for Commercial & Community Assets	Reopening of the Harlequin Theatre
2.	Councillor Chester	Councillor (A) King, the Executive Member for Commercial & Community Assets	Replanting trees at Meadowcroft
3.	Councillor Buttironi	Councillor Moses, the Executive Member for Environment & Sustainability	Potholes in the car park at Riverside Park
4.	Councillor Ritter	Councillor Moses, the Executive Member for Environment & Sustainability	Biodiversity Duty
5.	Councillor Smith	Councillor Neame, the Executive Member for Housing & Support	Rise in Council House Rents
6.	Councillor Khan	Councillor Michalowski, the Executive Member for Place, Planning & Regulatory Services	Article 4 Directive & Permitted Development Rights
7.	Councillor Ashford	Councillor Michalowski, the Executive Member for Place, Planning & Regulatory Services	Anonymous Planning Objectives
8.	Councillor Proudfoot on behalf of Councillor Torra	Councillor Biggs, the Leader of the Council	Incentivising local business to go green
9.	Councillor Sinden	Councillor Biggs, the Leader of the Council	Targeted Youth Services
10.	Councillor Thorne	Councillor Biggs, the Leader of the Council	Spillages by Thames Water
11.	Councillor Chandler	Councillor Biggs, the Leader of the Council	Community Transport
Written responses to be given after the meeting			
12.	Councillor Khan	Councillor Biggs, the Leader of the Council	The limits of Health & Social Care Services

Note: For more information on the response to Council questions, please see the following page on the Council's website:

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<https://reigate-banstead.moderngov.co.uk/ecCatDisplay.aspx?sch=doc&cat=13260>

63 Recommendations

63a Budget & Capital Programme 2024/25

Councillor Biggs, the Leader of the Council, proposed the Budget & Capital Programme 2024/25 recommendations as set out in Minute 61 of the Executive meeting held on 1 February 2024. Thanks were given to the Chief Finance Office, the Finance Team, the Budget Scrutiny Review Panel, the Overview & Scrutiny Committee, Councillor Harrison in his capacity of the Overview & Scrutiny Committee, Members of Council and residents for their contributions to the development of the Budget & Capital Programme for 2024/25.

Councillor Lewanski, the Executive Member for Finance, Governance & Organisation seconded the motion and reserved the right to speak.

Councillor Harrison, in his capacity as the Budget Scrutiny Review Panel and Chair of the Overview & Scrutiny Committee, made the following observations about the Budget & Capital Programme for 2024/25:

- Changes in the budget for savings, income and additional costs had been tested year on year along with the explanations provided. The panel had concluded the additional income and cost increases were reasonable and achievable based on sound financial practices and reasonable assumptions in terms of service delivery. The proposed savings were not expected to have a significant impact on service scope or quality.
- A number of uncertainties related to assumptions and individual budgets lead to a further review in January 2024 after the Government's funding announcement. The major areas of risk were recorded as homelessness, support for and provision of temporary accommodation, the housing benefit subsidy, recycling income, the Government's proposals for the management of waste, Reinforced Autoclaved Aerated Concrete (RAAC) at the Harlequin theatre and inflation. Whilst the latter had reduced it appeared likely to be longstanding. Therefore, the Panel and Committee refused to make any firm conclusions.
- The Commercial Strategy included additional income from the Rise when all the units were fully let. Additionally, a provision was made for credit losses associated with the investment in Pathway for Care.
- The latest position as of January 2024 saw positive changes with a reduced call on earmarked reserves down from £1m to £700K.

Councillor Essex, in his capacity as the Leader of the Green Group, made the following observations about the Budget & Capital Programme for 2024/25:

- Thanks were given to officers for the preparation of the budget and Councillor Harrison in his capacity as the Chair of the Budget Scrutiny Review Panel. Support was expressed for the Panel's conclusions.
- Called for the Council to focus on its own services rather than risky commercial ventures, citing Pathway for Care and Horley Business Park LLP for which there was credit loss provision in the accounts.
- Welcomed the changes to the empty house property tax and the extension to the Council Tax Discount Scheme. However, called for more to be done to support affordable housing, recycling and action around climate change rather than boosting reserves. Funds allocated to reserves could be used to support residents,

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the work of Community Development workers and to guarantee continuation of the Household Support Fund for 2024/25.

Councillor Harrison, spoke again but this time in his capacity as the Leader of the Residents' Association Group, making the following observations about the Budget & Capital Programme for 2024/25:

- Reserves were being used at an unacceptable level. The Housing Benefit subsidy was an issue in 2023/24 and would continue to be in 2024/25. This needed to be addressed nationally by the Local Government Association with it being noted that it was expected that the Leader would press this issue.
- The Residents' Association had difficulty supporting the Capital Budget in particular the additional £4.3m allocation to Marketfield Way. It was acknowledged that this was a complex project, the biggest the Council had undertaken. Also, that it took place during the period of the pandemic which had been the source of additional costs. But as a large project, it should have been anticipated that there would be some change in the scope. The new housing provided by the project was welcomed along with the reduction in risk through the sale of assets. The ongoing shortfall was an additional £700K compared to the original business case. It has been an open secret since December 2022 that the project was running over budget. It had been reported that Portfolio Holders had been appropriately informed and briefed. This could not be verified and those involved were no longer Councillors. It was questioned if those involved had been sufficiently curious. The emphasis had been on regeneration when it should have also been about achieving a financial return.
- Encouragement was given to look at the Council's financial controls such that any project with a budget of more than half a million pounds should be monitored for overspends greater than £25K. It was suggested that the project should have been taken to the Executive in January 2023 and Council should have been considering the additional funding as part of the budget for 2023/24.
- It had been requested that a vote be allowed on the separate parts of the Budget and Capital Programme for 2024/25 but this had not been possible. As a result, the Residents' Association would be voting against the whole of the package.

The Mayor invited other Members to speak on the Budget & Capital Programme for 2024/25. Councillor Bray, made the following observations:

- As an ex-banker she had an expectation that the Council would have released the allocated funding in tranches, probably in thirds, with progress reports being provided throughout. It was doubted that the overspend had happened in the final phase of the project. Rather this would have happened throughout the lifetime of the project. Regular figures should have been supplied on how the budget was being spent. In banking, a traffic light approach would have been taken to report on the health of the project. As a result, more detailed figures would have been requested.
- It had been suggested that members of the Executive lacked curiosity. This indicated a need to look at the governance of such projects. It was appreciated that there was a big increase in the cost of raw materials during the pandemic but the impact of this on the budget for the project should have been known about during its lifetime.
- As it was not possible to support this element of the project or vote on the elements separately, it was not possible for the Budget and Capital Programme for 2024/25 to be supported as a whole.

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Councillor Walsh, made the following observations reflecting on the comments that has already been made on the Marketfield Way project:

- Disappointment was expressed at the Council's position. It was encouraged that the focus be on ensuring the Council did not get into the same position again. Councillor Bray's call to look at project governance and processes was supported.

Councillor Blacker, made the following observations also commenting on the Marketfield Way project:

- Whilst the project should not have been run as it was, it was not possible to go back. Without granting the additional funding being requested, the Council would not have a development bringing in a significant income. It was acknowledged the project should have been managed better.

Councillor Lewanski, the Executive Member for Finance, Governance & Organisation having reserved the right to speak responded to the debate, making the following observations on the Budget & Capital Programme for 2024/25:

- Pleasure was expressed on being able to present a balanced budget without calling on General Reserves. The Council was nowhere near a Section 114. The budget for 2024/25 was smaller than that for the current year. Whilst this was only a small reduction, it nevertheless demonstrated the commitment to reducing costs.
- There was little choice but to increase Council Tax by 2.99% which was noted as still being below the Consumer Price Index (CPI) at 4%. The need for the increase was compounded by the reduced share of business rate income due to the Government's formula.
- Government Grant income had increased.
- It was being proposed to offer a new Council Tax Support Scheme. One of the benefits of the scheme would be that 800 household would qualify for a full 100% reduction. A budget allocation had been made to manage the risks of housing, benefit subsidy losses and a strategy was being followed to avoid external borrowing costs. Significant efficiencies and income generation savings had been found to help balance the overall budget requirement.
- Additional funding, received from the Local Government Settlement which was announced after the Budget and Capital Programme for 2024/25 was reviewed by the Executive, would be added to the Environmental Sustainability and Community Partnership Reserves.
- Whilst as outlined in the report, the Council had healthy reserves, a budget gap continued to be forecast over the medium term. As a result, all budgets would therefore continue to be take through Financial Sustainability Programme to ensure that all services delivered value for money.
- The Capital Investment Plan would improve and enhance the asset base capital growth providing £4.3million for Marketfield Way, the Council's first electric refuse vehicles, investment in solar compacting bins as well as the move to HVO fuel vehicles.
- In summary, the Budget and Capital Programme for 2024-25 was based on a full and robust assessment of what the Council did and how services were funded. It had been developed by Executive Members supported by the Management Team. It had been reviewed by Overview and Scrutiny. It was recommended as a firm foundation for the Council's future financial plans and service delivery.

Councillor Biggs, the Leader of the Council, responded to the debate on the Budget & Capital Programme for 2024/25:

- Officers were thanked for the time and effort taken to ensure the Council continued to provide some of the best services in the county and country.

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- In response to the comments made by Councillor Essex, it was explained that the Community Fund was in place to support volunteers and their work on health and wellbeing.
- As had been promised, issues would not be deferred. This would be continued and lessons would be learnt from what had happened in the past. A process had already been put in place to ensure that this was the case.
- Disappointed was expressed if it was decided to vote against a very good budget which included investment in town centre regeneration to provide more than just buildings. The Rise provided an entertainment centre which had significantly grown the footfall in Redhill Town Centre. Investment was happening to make the Borough the best place possible including in Community Centres, more health and wellbeing services, waste services with more recycling and biodiversity.
- The Budget and Capital Programme for 2024/25 had been questioned and scrutinised for eight months and more. It was the right budget which everyone was encouraged to support.

Councillor Chandler, proposed the amendment to the Budget & Capital Programme 2024/25 recommendations as set out in the addendum to the agenda making the following comments:

- The amendment aimed to improve the budget in three areas: delivering the Environmental Sustainability strategy, completing the recycling rollout and delivering Affordable Housing as the Council was taking too much time in delivering these objectives.
- It was therefore suggested that the budget be amended to provide more staff within the Sustainability Team, an additional officer to increase the Council's capacity to engage and collaborate with private and social landlords in order to complete the recycling rollout by the Government's deadline of March 2025 and a dedicated officer to develop a long-term plan to increase Affordable Housing stock.
- Additionally, to address concern that the Government may discontinue the Household Support Fund Grant, the one-off grant funding announced in February 2024 and General Reserves would be used to maintain the fund at £500K for the 2024/25 financial year.

Councillor Essex seconded the motion and reserved the right to speak.

The Mayor invited other Portfolio Holders to speak on the amendment to Budget & Capital Programme for 2024/25. Councillor Neame, the Executive Member for Housing & Support, made the following observations:

- There was already a Senior Development Manager in the Place Delivery Team specialising in the delivery of Affordable Housing.
- With regard to an Empty Properties Officer role, the Council was already identifying empty homes for conversion into housing for social rent. As of January 2024, 105 properties empty for over two years had been identified. Unfortunately, there had been little interest from owners to engage with the Council. Therefore, two different approaches were being employed; (1) A higher Council Tax was being applied to empty properties to encourage engagement with the Council; and (2). For the Council to consider directly purchasing.

Councillor Avery, the Executive Member for Neighbourhood Services, made the following observations on the Budget amendment:

- Two new officers as part of the Recycling Team would not be self-funding.
- Additionally, making savings through the costs associated with domestic waste was not achievable because this was managed by Surrey County Council.

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- Now that the Government's new recycling strategy was available, how this should be achieved was being considered.
- There were 5.5K properties to which the full recycling scheme needed to be rolled-out but all were already on the paper recycling scheme. The Council had taken a proactive approach, was already ahead of time and would continue to approach in the most efficient way possible.

The Mayor invited other Members to speak on the amendment to the Budget & Capital Programme for 2024/25. Councillor Harrison, in his capacity as the Leader of the Residents' Association Group, made the following observations:

- This was the third time elements of this proposal had been heard. There was sympathy for the observations made on Environmental Sustainability and the recycling rollout.
- However, there was concerned for this as a whole package which included setting up another reserve fund for Household Support. It was recommended that the Council should wait and see if this was needed in 2024/25 before another reserve fund was established..
- On which basis, support could not be given to the amendment.

Councillor Smith, made the following observations on the Budget amendment:

- There was a lack of support from the national Government for local Councils with others having to declare bankruptcy. The funding provided was therefore disappointing. It gave respite but was nowhere near enough given stubbornly high inflation and demands for services such as housing.
- Commended the budget for increasing the Council Tax Support Scheme. However, it was questioned why the Council wanted to increase the fees for a Council Tax Summons and Liability Orders. In a cost-of-living crisis, it was questioned why the Council wanted to place more debt on those who were struggling.
- It was noted that the budget was balanced before a small increase in Government funding. However, the proposal was to use the additional Government funding to increase reserves. It was recommended that this decision be reversed as this was ten times the income that would be generated from the increase in Summons fees.
- It was noted that the budget made no mention of CCTV in Town Centres despite the Executive having said it would give this further consideration. Establishing a Business Improvement District was recommended to bring in external funding in part to fund support for CCTV investment.
- It was noted that the budget amendment went some way to delivering real change for local communities. However, it was thought unfortunate that this was funded by using reserves rather than building rents which were underperforming. Labour would explore employing specialist building management staff to look after and improve the Council's buildings.

Councillor Walsh, made the following observations on the Budget amendment:

- Support could not be given to the budget amendment because it asked residents to spend more of their money with not enough certainty about how this would provide additional revenue.

Councillor Essex, having reserved the right to speak, responded to the debate and made the following observations about the amendment to the Budget & Capital Programme for 2024/25:

- The amendment was about making the budget better. An allocation of £20m was made to Affordable Housing in 2020. The budget amendment sought to provide a

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- plan to deliver on the promise made. The same was true of climate change; reserves had been allocated but there was no plan for how this should be spent.
- The recycling proposal being self-funded at a cost of £90K was achievable because this had been verified by officers. This would be achieved by increased recycling income and credit from Surry County Council.
 - The Council was halfway through the recycling rollout with 5.5K households still to benefit fully from the scheme. The new target for delivery from the Government, was ten years later than the previous deadline for completion set by the Council. The speed of the rollout was constrained by recycling officer time. A small change in the budget would allow progress to be made.
 - The cost of living continued to be an issue but the Government had yet to commit to continue funding the Household Support Grant. The Council was called on to make this commitment.
 - The budget amendment sought to accelerate the action on promises made but which had not been delivered. Money had sat in bank accounts for years. The amendment proposed to make officer resource available to ensure the development of proper plans.

Councillor Lewanski, the Executive Member for Finance, Governance & Organisation responded to the debate, made the following observations on the amendment to Budget & Capital Programme for 2024/25:

- It was highlighted that, as much as there was respect for the budget amendments, there had been opportunity to discuss this at the Budget Scrutiny Panel and Overview & Scrutiny Committee meetings.
- This had covered three areas with Affordable Housing and the recycling rollout already addressed by the relevant Executive Members as part of the debate.
- With regard to Environmental Sustainability, the proposal of a new climate change officer did not hold merit. There was no evidence provided that additional staff would bring acceleration of activity. Additionally, funding for external advice already existed. Additionally, there was no recognition of the complexity and dependencies associated with upscaling Electric Vehicle charging points.
- Retrofitting activity had already commenced. The rollout was being phased to ensure understand the requirements of all buildings based on the Council having commissioned an energy audit.
- The move to Net Zero would cost millions. If delivered in two years, this would leave the Council with no reserves. Business cases were needed. Whilst there was a mandate for a switch to electric vehicles, there remained a service risk. It was therefore currently the policy to seek solutions with the lowest possible carbon emissions whilst maintaining service provision. The Council was already leading on electric vehicle charging but the amendment did not recognise the complexity of delivering this change.
- The Leader had already written to the relevant Government Minister to receive clarification on the Household Support Fund so it was not yet clear whether a new reserve was required.
- A number of elements in the amendment were uncoded and therefore did not meet the objective of the Council's Financial Sustainability Programme.

Councillor Biggs, the Leader of the Council, responded to the debate on the amendment to Budget & Capital Programme for 2024/25:

- The debate on the amendment had not been given enough time or scrutiny. This was not fair to residents and therefore could not be supported by the Administration.

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- Some elements of the amendment were already included in the budget. Such as an additional Environmental Sustainability Officer with an additional budget allocation of £100K.
- The Council was committed to delivering the Waste and Recycling Strategy. This would be easier to achieve with Government support.
- The Council was already delivering on Affordable Housing in the North and South of the Borough. However, it had stepped back from schemes that would not have added value to the community.
- The relevant Government Minister and the Chancellor had received letters to press them to continue funding the Household Support Fund.
- In response to the comments made by Councillor Smith, it was noted that the Council was not Woking or Birmingham which were respectively increasing their Council Tax by 9% and 21%. The comments made about the Council's property team were challenged. Officers worked very hard to manage the Council's estate.
- Members were urged not to support the budget amendment. Not because it did not have some good ideas but because it needed more understanding and scrutiny despite there having been lots of opportunities to add and comment on the budget.
- It was offered, that if there had not been enough time to discuss this budget, then this could be started earlier for 2025/26.

The amended recommendations on the Budget & Capital Programme for 2024/25 were put to a recorded vote:

- Those Councillors voting for the budget amendment were: Chandler, Chester, Essex, Khan, Proudfoot, Ritter, Thorne and Smith.
- Those Councillors voting against the budget amendment were: Adamson, Ashford, Avery, Baker, Blacker, Biggs, Bray, Buttironi, Cooper, Dwight, Elbourne, Fairhurst, Green, Harp, Harrison, Hinton, Hudson, Kelly, King (Andrew), King (James), Kulka, Lewanski, Michalowski, Moses, Neame, Parnall, Sachdeva, Stevens, Tary and Wash
- Those Councillors who abstained on the budget amendment were: Humphreys and Sinden

The motion was not carried.

The original recommendations on the Budget & Capital Programme for 2024/25 as contained in Minute 61 were put to a recorded vote:

- Those Councillors voting for the Budget & Capital Programme for 2024/25 were: Ashford, Avery, Baker, Biggs, Blacker, Buttironi, Cooper, Dwight, Elbourne, Fairhurst, Green, Hudson, Kelly, King (Andrew), King (James), Kulka, Lewanski, Michalowski, Moses, Neame, Parnall, Sachdeva, Stevens and Tary
- Those Councillors voting against the Budget & Capital Programme for 2024/25 were: Adamson, Bray, Chandler, Chester, Essex, Harp, Harrison, Hinton, Khan, Proudfoot, Ritter, Smith and Thorne,
- Those Councillors who abstained on the Budget & Capital Programme for 2024/25 were: Humphreys, Sinden and Walsh.

The motion was carried.

63b Council Tax 2024/25

Agenda Item 1

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The Council Tax Setting for 2024/25 as contained in Minute 62 was put to a recorded vote:

- Those Councillors voting for the Council Tax increase for 2024/25 were: Adamson, Ashford, Avery, Baker, Blacker, Biggs, Bray, Buttironi, Chandler, Chester, Cooper, Dwight, Elbourne, Essex, Fairhurst, Green, Harp, Harrison, Hinton, Hudson, Kelly, King (Andrew), King (James), Kulka, Lewanski, Michalowski, Moses, Neame, Parnall, Proudfoot, Ritter, Sachdeva, Sinden, Smith, Stevens, Tary, Thorne and Wash
- No Councillors voted against the Council Tax increase for 2024/25.
- Those Councillors abstaining on the Council Tax increase for 2024/25 were: Humphreys and Khan.

The motion was carried.

63c Calendar of Meetings 2024 - 2025

RESOLVED: to adopt the calendar of meetings for 2024/25 as presented in the agenda.

64 Statements

The Leader made a statement to the meeting. Sincere thanks were expressed to Councillor Ashford for his tireless work with the Borough's Community Centres following his having stepped down as the Executive Member for Communities & Leisure. It was noted that Councillor Ashford had created a legacy of improved health and wellbeing.

Additionally, it was announced the Councillor Sinden was the Deputy Mayor Elect for 2024/25. The Councillor's work in supporting the Mayor's events during 2023/24 was recognised.

Thanks were given to everyone who had worked hard to make the meeting and the budget debate possible. The Managing Director and her team were specifically thanked for all they continued to do to make the Council the best it could be.

65 Pay Policy Statement for 2024/25

RESOLVED: to approve the Pay Policy Statement as presented in the agenda.

66 Constitution update: delegated authority to declare casual vacancies

The update to the Constitution to allow a casual vacancy to be declared under delegated authority was proposed by Councillor Lewanski and seconded by Councillor Harrison.

RESOLVED: to approve the recommendation to amend the Constitution to allow a delegated authority to declare casual vacancies.

67 Leader's announcements

There were no further announcements.

68 Mayor's announcements

The Mayor thanked Simon Bland, Diane Dunkley and the Economic Prosperity Team for the funds raised through the Reigate & Banstead Business Awards to support his charities; the Royal British Legion and the Lucy Rayner Foundation. The Harlequin Team was also thanked for its charity bucket collection which raised additional funds for the Lucy Rayner Foundation. Two further fundraising events were promoted; a charity quiz night on Thursday 22 February 2024 and a Ladies' Charity Lunch on 20 March 2024 to be held at Ciao Italia restaurant.

The meeting finished at 9.43 pm

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Reigate & Banstead Borough Council

Meeting of Council 28 March 2024

Public Questions

Number	Question by	To be answered by	Subject
1	Sujata Das	Councillor Moses, the Executive Member for Environment & Sustainability	Playgrounds in Horley West
2	Ian Vernon	Councillor Biggs, the Leader of the Council	The Local Government Declaration on Tobacco Control

Agenda Item 5

Sujata Das will ask the **Executive Member for Environment & Sustainability, Councillor Moses** the following question:

Question: Playgrounds in Horley West

There are multiple playgrounds in Horley West which are ready but not open to use. Can you please confirm when will these be open to public and why is this held up currently?

Ian Vernon will ask the **Leader of the Council, Councillor Biggs** the following question:

Question: The Local Government Declaration on Tobacco Control

Our Government has made a decision to create a Smokefree England by 2030, however, The Khan Review, June 2022 (welcomed by The Royal College of Psychiatrists), highlighted, "without further action, England will miss the Smokefree 2030 target by at least 7 years. There is an opportunity for local Representatives to lead on this matter to influence the success of the target, and wider behaviour, to reduce further detriment to public health. The above Royal College and The Royal College of Physicians, endorsed by Cancer Research UK and The Faculty of Public Health, in 2013, stated, " It is not acceptable to sustain an environment that actually supports smoking or promotes it covertly through the use of rights and privileges to smoke". The ALL PARTY Parliamentary Group, (2021), on Smoking and Health, in their recommendation of delivering a Smokefree 2030, endorsed the Governing Party's approach to the cessation of poor health by non-smoking. Alongside the publicly funded educational drive in our schools, colleges and GP Surgeries, and respecting the lead from Surrey County Council, (which became a signatory some 10 years ago), will THIS Council join its wider party approach, acknowledge the decades of medical, public health, fire and safety advice and act in joining some 130 other authorities in signing up to The Local Government Declaration on Tobacco Control.

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SIGNED OFF BY	Chief Finance Officer
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TO	Overview & Scrutiny Committee Executive Council
DATE	Thursday 14 March 2024 Thursday 21 March 2024 Thursday 28 March 2024
EXECUTIVE MEMBER	Deputy Leader and Portfolio Holder for Finance and Governance

KEY DECISION REQUIRED	Y
WARDS AFFECTED	(All Wards)

SUBJECT	Treasury Management Strategy Statement 2024/25
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<p>RECOMMENDATIONS</p> <p>Overview & Scrutiny Committee:</p> <p>i) Overview & Scrutiny Committee is asked to consider and to provide feedback on the following which are to be finalised and submitted for approval by the Executive on 14 March 2024 and Council on 28 March 2024:</p> <ul style="list-style-type: none"> • Treasury Management Strategy 2024/25; • Investment Strategy 2024/25; and • Capital Strategy 2024/25. <p>Executive:</p> <p>i) Executive is asked to consider the following and recommend their approval by Council:</p> <ul style="list-style-type: none"> • Treasury Management Strategy for 2024/25; • Investment Strategy 2024/25; and • Capital Strategy 2024/25

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<p>Council:</p> <p>i) Council is asked to approve the following:</p> <ul style="list-style-type: none">• Treasury Management Strategy for 2024/25;• Investment Strategy 2024/25; and• Capital Strategy 2024/25
<p>REASONS FOR RECOMMENDATIONS</p>
<p>To enable the adoption of the updated Treasury Management Strategy Statement for the 2024/25 financial year in order to comply with the Chartered Institute of Public Finance Code of Practice on Treasury Management and Prudential Code for Capital Finance in Local Authorities. Also, with Government (Department for Levelling up, Housing and Communities) investment and borrowing guidance.</p>
<p>EXECUTIVE SUMMARY</p>
<p>This report sets out the Treasury Management Strategy, Investment Strategy and Capital Strategy for 2024/25.</p> <p>It has been prepared in consultation with the Council’s treasury management advisors and confirms compliance with relevant guidance.</p>
<p>Council has authority to approve the Treasury Management Strategy Statement, Prudential Indicators, Minimum Revenue Provision Policy and Borrowing Limits.</p>

<p>STATUTORY POWERS</p>
<ol style="list-style-type: none">1. The Council is required to approve an annual Treasury Management Strategy Statement, Investment Strategy and Capital Strategy to ensure that borrowing and investment activities are prudent, affordable and sustainable.2. The Council operates its treasury management activity as an integral part of its statutory obligation to manage the Council’s finances effectively under the Local Government Act 2003 and associated guidance.3. Treasury Management activities are undertaken in accordance with the Chartered Institute of Public Finance and Accountancy’s (CIPFA) Code of Practice on Treasury Management, the Prudential Code for Capital Finance in Local Authorities, and the Government’s (Department for Levelling up, Housing and Communities - DLUHC) investment and borrowing guidance.
<p>BACKGROUND</p>
<ol style="list-style-type: none">4. The Council is required to approve an annual Treasury Management Strategy, Investment Strategy and Capital Strategy (in combination referred to as ‘the Strategy’) to ensure that borrowing and investments are prudent, affordable and sustainable.5. The Strategy for 2024/25 is set out in the attached Annexes.

It has been prepared in line with the CIPFA Codes and Government guidance and comprises three sections:

1. **Treasury Management Strategy** which explains the Council’s approach to management of cash flows, borrowing and investments, and the associated risks;
2. **Investment Strategy** which sets out how the Council invests its cash and what it aims to achieve through that investment; and
3. **Capital Strategy** which provides a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services.

6. The Strategy has the following objectives:

- To consider and effectively address the risks associated with Treasury Management activity;
- To optimise the flow of cash through the organisation in order to maximise the potential for using it to earn investment income for the Council, and where required limit the borrowing costs;
- To optimise the returns from investments while meeting the overriding need to protect the capital sum and ensure that the cash is available when required;
- To align investments in relation to cash flow, within statutory constraints, in order to increase investment returns in future years;
- To optimise the revenue budget costs of undertaking all treasury activities;
- To monitor and review significant changes in the pattern of cash movements and interest rate movements and react accordingly;
- To incorporate any changes to CIPFA’s Treasury Management Code of Practice and the Prudential Code and Government guidance that govern effective treasury management; and
- To incorporate implementation of International Financial Reporting Standard (IFRS) 16 in April 2024.

KEY INFORMATION

Capital Investment Strategy and Capital Programme

7. The capital expenditure plans set out in this report are based on the Capital Programme 2024/25 to 2028/29 that was approved by Executive and Council in February 2024.

Prudential Indicators

8. The Prudential Indicators as set out in the Strategy provide a sound basis for future investment and borrowing decisions. A summary of the key indicators is provided in the table below and they are explained in the Treasury Management Strategy at Annex 1.

Table 1: PRUDENTIAL INDICATORS	2022/23 Actual £000	2023/24 Forecast £000	2024/25 Forecast £000	2025/26 Forecast £000	2026/27 Forecast £000

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Capital Expenditure	21,156	10,773	16,048	6,665	4,856
Capital Financing Requirement (CFR)	93,300	72,600	79,300	80,800	82,100
Cumulative External Debt	7,000	-	-	-	-
Operational Boundary for External Debt	69,000	35,000	36,000	37,000	38,000
Authorised Limit for External Debt	79,000	40,000	41,000	42,000	43,000
Liability Benchmark	(9,000)	(3,500)	3,100	11,600	11,000
Proportion of financing costs to revenue stream as a %	4.08%	3.55%	8.20%	8.34%	8.44%
Net income from commercial and service investments to net revenue stream as a %	13.52%	9.18%	10.55%	12.14%	13.96%
Credit risk indicator - portfolio average risk	A				
Liquidity risk - cash available within 3 months	£3.0 million				
Revenue impact of a 1% change in rates	£0.451 million pa				
Maturity Structure of Borrowing 2024/25 – Upper Limit	100%				
Maturity Structure of Borrowing 2024/25 – Lower Limit	0%				

CIPFA Code

9. CIPFA published the latest Prudential and Treasury Management Codes in December 2021. They require investments and investment income to be attributed to one of three purposes:

(i) Treasury management

- Arising from the organisation’s cash flows or treasury risk management activity, this type of investment represents balances which are only held until the cash is required for use; and
- Treasury investments may also arise from other treasury risk management activity which seeks to prudently manage the risks, costs or income relating to existing or forecast debt or treasury investments.

(ii) Service delivery

- Investments held primarily and directly for the delivery of public services including housing, regeneration and local infrastructure; and
- Returns on this category of investment which are funded by borrowing are permitted only in cases where the income is ‘...*either related to the financial viability of the project in question or otherwise incidental to the primary purpose...*’.

(iii) Commercial return

- Investments held primarily for financial return with no treasury management or direct service provision purpose;
- Risks on such investments should be proportionate to a council's financial capacity – i.e., that 'plausible losses' could be absorbed in budgets or reserves without unmanageable detriment to local services; and
- Councils must not borrow to invest primarily for financial return.

10. The Investment Strategy at Annex 2 covers:

- Classification of investments for service or commercial purposes;
- The authority's approach to investments for service or commercial purposes (together referred to as non-treasury investments), including defining the authority's objectives, risk appetite and risk management in respect of these investments, and processes ensuring effective due diligence;
- An assessment of affordability, prudence and proportionality in respect of the authority's overall financial capacity (ie. whether losses could be absorbed in budgets or reserves without unmanageable detriment to local services);
- Details of financial and other risks of undertaking investments for service or commercial purposes and how these are managed;
- Limits on total investments for service purposes and for commercial purposes respectively (consistent with any limits required by other statutory guidance on investments);
- Requirements for independent and expert advice and scrutiny arrangements (while business cases may provide some of this material, the information contained in them is periodically re-evaluated to inform the overall strategy); and
- Statement of compliance with paragraph 51 of the Prudential Code in relation to investments for commercial purposes, in particular the requirement that an authority must not borrow to invest primarily for financial return.

11. The Code also requires authorities to:

- Adopt a debt Liability Benchmark treasury indicator to support the financing risk management of the capital financing requirement; this is shown in chart form for a minimum of ten years, with material differences between the liability benchmark and actual loans to be explained;
- Class long term treasury investments, (including pooled funds), as commercial investments unless justified by a cash flow business case;
- Include some pooled funds (longer term instruments, including those with no fixed maturity date) in the indicator for principal sums maturing in years beyond the initial budget year;
- Ensure that the knowledge and skills register for officers and members involved in the treasury management function is proportionate to the size and complexity of the treasury management conducted;

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- Submit quarterly performance reports to Members (as part of integrated budget monitoring reports), including updates on performance against the Prudential Indicators; and
- Set out any environmental, social and governance (ESG) issues to be addressed within the treasury management policies and practices.

12. The main requirements of the Code relating to service and commercial investments are:

- The risks associated with service and commercial investments should be proportionate to their financial capacity – losses to be absorbed in budgets or reserves without unmanageable detriment to local services;
- An authority must not borrow to invest for the primary purpose of commercial return. It is not prudent for local authorities to make any investment or spending decision that will increase the Capital Financing Requirement, and so may lead to new borrowing, unless directly and primarily related to the functions of the authority;
- To conduct an annual review to evaluate whether commercial investments should be sold to release funds to finance new capital expenditure or refinance maturing debt;
- To include the new Prudential Indicator for the net income from commercial and service investments as a proportion of the net revenue stream; and
- To prepare supporting Investment Management Practices which set out how the Council will manage risks associated with non-treasury investments.

13. The underlying principles, including that an authority must not borrow to invest primarily for financial return, align with the Government's changes to PWLB borrowing terms in 2020.

OPTIONS

14. Overview & Scrutiny Committee has two options

- **Option 1:** Note the report and make no observations to the Executive.
- **Option 2:** Note the report and make any observations to the Executive.

15. Executive has two options:

- **Option 1:** Recommend the Treasury Management Strategy, Investment Strategy and Capital Strategy for 2024/25 to Council for approval;
- **Option 1:** Request further information before the Treasury Management Strategy, Investment Strategy and Capital Strategy for 2024/25 are recommended to Council for approval. This option would delay approval of the Strategy and may constrain treasury management activity.

16. Council has two options:

- **Option 1:** To approve the Treasury Management Strategy, Investment Strategy and Capital Strategy for 2024/25 to Council;
- **Option 1:** To request further information before the Treasury Management Strategy, Investment Strategy and Capital Strategy for 2024/25 are approved. This option would delay approval of the Strategy and may constrain treasury management activity.

17. A delay in approving the 2024/25 Treasury Management Strategy Statement may result in reduced returns on investments and delay borrowing to fund planned capital investment. It would also mean that the Council is at risk of non-compliance with the latest CIPFA Codes of Practice and DLUHC guidance.

LEGAL IMPLICATIONS

18. There are no further legal implications arising from this report.

FINANCIAL IMPLICATIONS

19. The financial impacts of this Strategy have been reflected within the Council's approved 2024/25 Budget. There are therefore no additional financial implications from this report.

EQUALITIES IMPLICATIONS

20. The Council has a statutory duty to consider equality implications as part of the decision making process and demonstrate this. There are no equality implications arising from this report.

ENVIRONMENTAL SUSTAINABILITY IMPLICATIONS

21. The Council aims to be a responsible investor and will consider environmental, social and governance (ESG) issues when investing.

COMMUNICATION IMPLICATIONS

22. There are no communication implications arising from this report.

RISK MANAGEMENT CONSIDERATIONS

23. These are set out in the Annexes to the report

CONSULTATION

24. The Finance & Governance Portfolio holder, the Chair of Overview & Scrutiny and Overview & Scrutiny Committee Members had an opportunity to consider the Council's approach to Treasury Management at a briefing with the Council's treasury advisors Arlingclose and the Finance team on 5 March 2024.

25. Overview & Scrutiny Committee's feedback at its meeting on 14 March 2024 will be considered by Executive on 21 March 2023 and Council on 28 March 2024.

POLICY FRAMEWORK

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26. The Strategy is part of the Council's Policy Framework as set out in Article 4 of the Constitution.

BACKGROUND PAPERS

- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2017 ('the Code')
- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2021 ('the Code')
- CIPFA Treasury Management Guidance Notes 2018 and 2021
- DLUHC Local Authorities (Capital Finance and Accounting) (England) Regulations 2003
- CIPFA Prudential Code for Capital Finance in Local Authorities (2021) (Prudential Code)
- CIPFA Prudential Code for Capital Finance in Local Authorities (2021) Guidance Notes
- DLUHC Consultation on changes to the capital framework - Minimum Revenue Provision (November 2021 to February 2022). Latest consultation closed 16 February 2024.
- *CIL Strategic Infrastructure Programme 2023-2027*, report to Executive, 23 March 2023
- *Budget and Capital Programme 2024/25*, report to Executive, 1 February 2024

ANNEXES

1. Treasury Management Strategy 2024/25
2. Investment Strategy 2024/25
3. Capital Strategy 2024/25

TREASURY MANAGEMENT STRATEGY

2024/25

March 2024

1. Introduction

Treasury management is the management of the Council's cash flows, borrowing and investments, and the associated risks.

The Council has invested substantial sums of money and is therefore exposed to financial risks including the loss of invested funds and the revenue effect of changing interest rates. The successful identification, monitoring and control of financial risk are therefore central to prudent financial management.

Treasury risk management is conducted within the framework of the Chartered Institute of Public Finance and Accountancy's *Treasury Management in the Public Services: Code of Practice 2021 Edition* (the CIPFA Code) which requires the Council to approve a treasury management strategy before the start of each financial year. This report fulfils the Council's legal obligation under the *Local Government Act 2003* to have regard to the CIPFA Code.

Investments held for service purposes and for commercial profit are considered separately in Annex 2, the Investment Strategy.

2. External Context

Source: Arlingclose

Economic background: The impact on the UK from higher interest rates and inflation, a weakening economic outlook, an uncertain political climate due to an upcoming general election, together with war in Ukraine and the Middle East, will be major influences on the Authority's treasury management strategy for 2024/25.

The Bank of England (BoE) increased Bank Rate to 5.25% in August 2023, before maintaining this level in September and then again in November. Members of the BoE's Monetary Policy Committee voted 6-3 in favour of keeping Bank Rate at 5.25%. The three dissenters wanted to increase rates by another 0.25%.

The November quarterly Monetary Policy Report (MPR) forecast a prolonged period of weak Gross Domestic Product (GDP) growth with the potential for a mild contraction due to ongoing weak economic activity. The outlook for CPI inflation was deemed to be highly uncertain, with near-term risks to CPI falling to the 2% target coming from potential energy price increases, strong domestic wage growth and persistence in price-setting.

Office for National Statistics (ONS) figures showed CPI inflation was 6.7% in September 2023, unchanged from the previous month but above the 6.6% expected. Core CPI inflation fell to 6.1% from 6.2%, in line with predictions. Looking ahead, using the interest rate path implied by financial markets the BoE expects CPI inflation to continue falling, declining to around 4% by the end of calendar 2023 but taking until early 2025 to reach the 2% target and then falling below target during the second half 2025 and into 2026.

ONS figures showed the UK economy grew by 0.2% between April and June 2022. The BoE forecasts GDP will likely stagnate in Q3 but increase modestly by 0.1% in Q4, a deterioration in the outlook compared to the August MPR. The BoE forecasts that higher interest rates will constrain GDP growth, which will remain weak over the entire forecast horizon.

The labour market appears to be loosening, but only very slowly. The unemployment rate rose slightly to 4.2% between June and August 2023, from 4.0% in the previous 3-month period, but the lack of consistency in the data between the two periods made comparisons difficult. Earnings growth remained strong, with regular pay (excluding bonuses) up 7.8% over the period and total pay (including bonuses) up 8.1%. Adjusted for inflation, regular pay was 1.1% and total pay 1.3%. Looking forward, the MPR showed the unemployment rate is expected to be around 4.25% in the second half of calendar 2023, but then rising steadily over the forecast horizon to around 5% in late 2025/early 2026.

Having increased its key interest rate to a target range of 5.25-5.50% in August 2023, the US Federal Reserve paused in September and November, maintaining the Fed Funds rate target at this level. It is likely this level represents the peak in US rates, but central bank policymakers emphasised that any additional tightening would be dependent on the cumulative impact of rate rises to date, together with inflation and developments in the economy and financial markets.

US GDP grew at an annualised rate of 4.9% between July and September 2023, ahead of expectations for a 4.3% expansion and the 2.1% reading for Q2. But as the impact from higher rates is felt in the coming months, a weakening of economic activity is likely. Annual CPI inflation remained at 3.7% in September after increasing from 3% and 3.2% consecutively in June and July.

Eurozone inflation has declined steadily since the start of 2023, falling to an annual rate of 2.9% in October 2023. Economic growth has been weak, and GDP was shown to have contracted by 0.1% in the three months to September 2023. In line with other central banks, the European Central Bank has been increasing rates, taking its deposit facility, fixed rate tender, and marginal lending rates to 3.75%, 4.25% and 4.50% respectively.

Credit outlook: Credit Default Swap (CDS) prices were volatile during 2023, spiking in March on the back of banking sector contagion concerns following the major events of Silicon Valley Bank becoming insolvent and the takeover of Credit Suisse by UBS. After then falling back in Q2 of calendar 2023, in the second half of the year, higher interest

rates and inflation, the ongoing war in Ukraine, and now the Middle East, have led to CDS prices increasing steadily.

On an annual basis, CDS price volatility has so far been lower in 2023 compared to 2022, but this year has seen more of a divergence in prices between ringfenced (retail) and non-ringfenced (investment) banking entities once again.

Moody's revised its outlook on the UK sovereign to stable from negative to reflect its view of restored political predictability following the volatility after the 2022 mini-budget. Moody's also affirmed the Aa3 rating in recognition of the UK's economic resilience and strong institutional framework.

Following its rating action on the UK sovereign, Moody's revised the outlook on five UK banks to stable from negative and then followed this by the same action on five rated local authorities. However, within the same update the long-term ratings of those five local authorities were downgraded.

There remain competing tensions in the banking sector, on one side from higher interest rates boosting net income and profitability against another of a weakening economic outlook and likely recessions that increase the possibility of a deterioration in the quality of banks' assets.

However, the institutions on our adviser Arlingclose's counterparty list remain well-capitalised and their counterparty advice on both recommended institutions and maximum duration remain under constant review and will continue to reflect economic conditions and the credit outlook.

Interest rate forecast (November 2023): Although UK inflation and wage growth remain elevated, the Authority's treasury management adviser Arlingclose forecasts that Bank Rate has peaked at 5.25%. The Bank of England's Monetary Policy Committee will cut rates in the medium term to stimulate the UK economy but will be reluctant to do so until it is sure there will be no lingering second-round effects. Arlingclose sees rate cuts from Q3 2024 to a low of around 3% by early-mid 2026.

Arlingclose expects long-term gilt yields to eventually fall from current levels (amid continued volatility) reflecting the lower medium-term path for Bank Rate. However, yields will remain relatively higher than in the past, due to quantitative tightening and significant bond supply. As ever, there will undoubtedly be short-term volatility due to economic and political uncertainty and events.

Like the BoE, the Federal Reserve and other central banks see persistently high policy rates through 2023 and 2024 as key to dampening domestic inflationary pressure. Bond markets will need to absorb significant new supply, particularly from the US government.

A more detailed economic and interest rate forecast provided by Arlingclose is included at Appendix 1.

For the purpose of setting the budget, it has been assumed that new treasury investments will be made at an average rate/yield of 5.02%, and that any new long-term loans will be borrowed at an average rate of 5.19%.

3. Local Context

At 31 December 2023, the Council had no loans. Investments included £51.0 million of treasury investments earning a return of 5.29%.

- £5.0 million was invested in unsecured bank deposits earning 5.20%;
- £36.0 million was invested in money market funds earning 5.32%; and
- 10.0million with the UK Debt Management Account Deposit Facility - DMADF - earning 5.23%.

Forecast changes in these sums at 31 March each year are set out in the balance sheet analysis in table 1 below.

Table 1: Balance sheet summary and forecast	31.3.23	31.3.24	31.3.25	31.3.26	31.3.27
	Actual	Estimate	Forecast	Forecast	Forecast
	£000	£000	£000	£000	£000
Capital financing requirement	93,300	72,600	79,300	80,800	82,100
Less: External borrowing	(7,000)	-	-	-	-
Internal borrowing	86,300	72,600	79,300	80,800	82,100
Less: Balance sheet resources	(102,400)	(89,200)	(89,200)	(82,000)	(84,100)
(Treasury investments) / New borrowing	(16,100)	(16,500)	(9,900)	(1,400)	(2,000)

The underlying need to borrow for capital purposes is measured by the Capital Financing Requirement (CFR), while balance sheet resources are the underlying sums available for investment.

The Council's current strategy is to maintain borrowing and investments below their underlying levels, known as internal borrowing.

The Council has an increasing CFR over the medium term, due to plans to invest in the capital programme.

CIPFA's *Prudential Code for Capital Finance in Local Authorities* recommends that the Council's total debt should be lower than its highest forecast CFR over the next three years. Table 1 confirms that the Council expects to comply with this recommendation.

Liability benchmark: To compare the Council’s actual borrowing against an alternative strategy, a liability benchmark has been calculated showing the lowest risk level of borrowing.

This assumes the same forecasts as table 1 above, but that cash and investment balances are kept to a minimum level of £13.0 million at each year-end. This comprises the £10.0 million minimum investment balance that the Council is required to hold at all times (to retain a desired ‘professional’ status when working with financial intermediaries) and an additional £3.0 million liquidity buffer to meet any unexpected cash flow shortfalls.

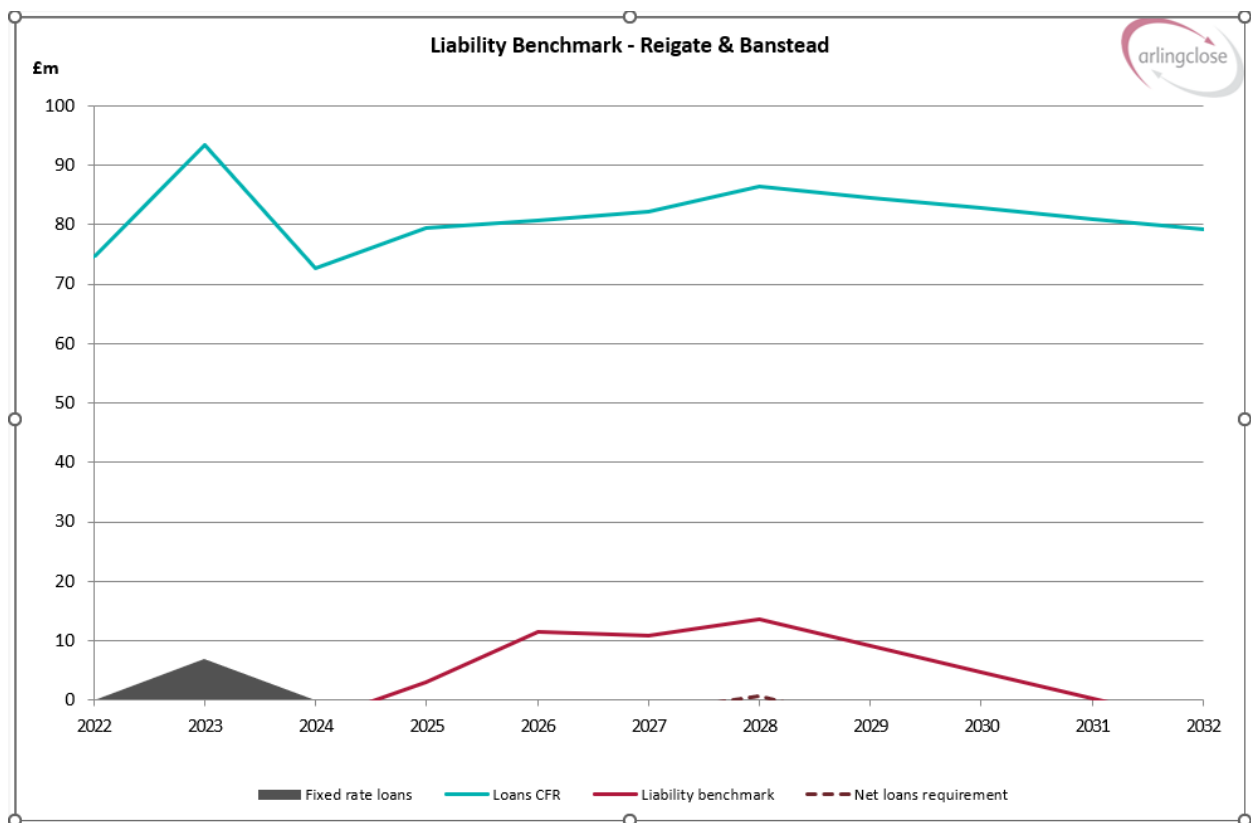
The liability benchmark is an important tool to help establish whether the Council is likely to be a long-term borrower or long-term investor in the future and helps shape its strategic focus and decision making.

The liability benchmark itself represents an estimate of the cumulative amount of external borrowing the Council must hold to fund current capital and revenue plans, while keeping treasury investments at the minimum level required to manage day-to-day cash flow.

Table 2: Prudential Indicator: Liability benchmark	31.3.23 Actual	31.3.24 Estimate	31.3.25 Forecast	31.3.26 Forecast	31.3.27 Forecast
	£000	£000	£000	£000	£000
CFR	93,300	72,600	79,300	80,800	82,100
Less: Balance sheet resources	(102,400)	(89,100)	(89,200)	(82,200)	(84,100)
Net Loans Requirement	(9,100)	(16,000)	(9,900)	(1,400)	(2,000)
Plus: Liquidity allowance	-	13,000	13,000	13,000	13,000
Liability Benchmark	(9,100)	(3,500)	3,100	11,600	11,000

The net loans requirement is negative through to 2026/27 meaning the Council is projected to have an investment balance rather than a borrowing need. This becomes a short-term borrowing requirement (indicated by a positive liability benchmark figure) from 2024/25 in order to maintain the £13.0 million minimum liquidity allowance.

Following on from the medium-term forecasts in table 2 above, the ten-year liability benchmark currently assumes no capital expenditure will be funded by borrowing after 2028 and reserves will increase by 2.5%. This is illustrated in the chart below:



The liability benchmark represents the minimum borrowing required to fund the Council’s capital program and maintain minimum balances of £13 million.

The Council is projected to have a minimum borrowing requirement of £3.1 million at 31 March 2025.

A borrowing requirement of £11.6 is expected by 31 March 2026, reducing to £11.0 million by 31 March 2027.

The net loans requirement on the graph is a lower figure and represents the borrowing that would be required if investment balances were kept at nil.

The graph represents only a snapshot in time at year end when balances are typically at their lowest and borrowing needs are highest. In year balances are expected to fluctuate to up to £32.4 million.

Borrowing in future is therefore in practice only likely to be required in the short term for some parts of the year.

Borrowing Strategy

The Council held a short-term loan of £7.0 million at 31 March 2023.

The liability benchmark forecast in table 2 confirms that the Council is only likely to need to borrow modest amounts for short term periods in the coming year.

The Council may opt to borrow additional sums to pre-fund future years’ requirements, providing this does not exceed the authorised limit for borrowing of £41.0 million.

Objectives: The Council's chief objective when borrowing is to strike an appropriately low risk balance between securing low interest costs and achieving certainty of costs over the period for which funds are required. Flexibility to renegotiate loans, should the Council's long-term plans change, is a secondary objective.

Strategy: The Council has historically been largely debt free and has borrowed on a temporary basis to fund short term cash flow shortfalls. This strategy is likely to remain the most effective in future.

Short-term borrowing sourced from other local authorities or housing associations is expected to continue to be the most cost-effective borrowing option, but the situation will remain under constant review.

The Council may on occasion arrange forward starting loans, where the interest rate is fixed in advance, but the cash is scheduled to be received at a later point in time.

Sources of borrowing: The approved sources of long-term and short-term borrowing are:

- HM Treasury's PWLB lending facility (formerly *the Public Works Loan Board*)
- UK Infrastructure Bank Ltd
- any institution approved for investments (Table 3 below)
- any other bank or building society authorised to operate in the UK
- any other UK public sector body
- UK public and private sector pension funds (except Surrey Pension Fund)
- capital market bond investors
- retail investors via a regulated peer-peer platform
- UK Municipal Bonds Agency plc and other special purpose companies created to enable local authority bond issues.

PWLB loans are no longer available to local authorities planning to buy investment assets primarily for yield; the Council intends to avoid this activity in order to retain its access to PWLB loans if required.

Municipal Bonds Agency: UK Municipal Bonds Agency plc was established in 2014 by the Local Government Association as an alternative to the PWLB. It issues bonds on the capital markets and lends the proceeds to local authorities.

This is a more complicated source of finance than the PWLB for two reasons:

- borrowing authorities will be required to provide bond investors with a guarantee to refund their investment in the event that the agency is unable to for any reason; and
- there will be a lead time of several months between committing to borrow and knowing the interest rate payable.

The Council is unlikely to borrow from this source: if it does any decision to borrow from the Agency will be the subject of a separate report to full Council.

Other sources of debt finance: In addition, capital finance may be raised by the following methods that are not borrowing, but may be classed as other debt liabilities:

- leasing
- hire purchase
- Private Finance Initiative
- similar assets based finance
- sale and leaseback

Short-term and variable rate loans: These loans leave the Council exposed to the risk of short-term interest rate rises and are therefore subject to the interest rate exposure limits in the treasury management indicators below.

4. Treasury Investment Strategy

The Council holds invested funds, representing income received in advance of expenditure plus balances and reserves.

In the past 12 months, the Council's treasury investment balance has ranged between £13.0 million and £50.8 million.

Objectives: The CIPFA Code requires the Council to invest its treasury funds prudently, and to have regard to the security and liquidity of its investments before seeking the highest rate of return, or yield. The Council's objective when investing money is to strike an appropriate balance between risk and return, minimising the risk of incurring losses from defaults and the risk of receiving unsuitably low investment income. The Council aims to be a responsible investor and will consider environmental, social and governance (ESG) factors when investing.

Strategy: New treasury investments will be made primarily to manage day-to-day cash flows using short-term low risk instruments.

The CIPFA Code does not permit local authorities to both borrow and invest long-term for cash flow management. But the Council may make long-term investments for treasury risk management purposes, including to manage interest rate risk by investing sums borrowed in advance for the capital programme for up to three years and to manage inflation risk by investing usable reserves in instruments whose value rises with inflation.

ESG policy: Environmental, Social and Governance (ESG) considerations are increasingly a factor in global investors' decision making, but the framework for evaluating investment opportunities is still developing and therefore the Council's ESG policy does not currently include ESG scoring or other real-time ESG criteria at an individual investment level.

When investing in banks and funds, the Council will prioritise banks that are signatories to the UN Principles for Responsible Banking and funds operated by managers that are signatories to the UN Principles for Responsible Investment, the Net Zero Asset Managers Alliance and/or the UK Stewardship Code.

Business models: Under the IFRS 9 accounting standard, accounting for certain investments depends on the Council’s “business model” for managing them. The Council aims to achieve value from its treasury investments by a business model of collecting the contractual cash flows and therefore, where other criteria are also met, these investments will continue to be accounted for at amortised cost.

In practice this distinction only applies to tradable investments where repayments are solely of principal and interest (such as bonds, certificates of deposit or Treasury bills): although allowable within the strategy the Council does not expect to use these products in the upcoming year.

Approved counterparties: The Council may invest its surplus funds with any of the counterparty types in table 3 below, subject to the limits shown.

Table 3: Treasury investment counterparties and limits			
Sector	Time limit	Counterparty limit	Sector limit
The UK Government	50 years	Unlimited	n/a
Local authorities & other government entities	25 years	£10 million	Unlimited
Secured investments ¹	25 years	£6 million	Unlimited
Banks (unsecured) ¹	13 months	£6 million	Unlimited
Building societies (unsecured) ¹	13 months	£3 million	£10 million
Registered providers (unsecured) ¹	5 years	£3 million	£13 million
Money market funds ²	n/a	£10 million	Unlimited
Strategic pooled funds	n/a	£2 million	£25 million
Real estate investment trusts	n/a	£2 million	£13 million
Other investments ¹	5 years	£2 million	£5 million

This table must be read in conjunction with the notes below:

- 1. Minimum credit rating:** Treasury investments in the sectors marked with an asterisk will only be made with entities whose lowest published long-term credit rating is no lower than A-.

Where available, the credit rating relevant to the specific investment or class of investment is used, otherwise the counterparty credit rating is used. However, investment decisions are never made solely based on credit ratings, and all other relevant factors including external advice will be considered.

2. **Minimum credit rating (money market funds):** Investment will only be made in money market whose lowest published credit rating is at least AAA.

This refers to the overall rating of the fund rather than the weighted average ratings of the fund's investments.

For entities without published credit ratings, investments may be made where external advice indicates the entity to be of similar credit quality.

Government: Loans to, and bonds and bills issued or guaranteed by, national governments, regional and local authorities and multilateral development banks. These investments are not subject to bail-in, and there is generally a lower risk of insolvency, although they are not zero risk. Investments with the UK Government are deemed to be zero credit risk due to its ability to create additional currency and therefore may be made in unlimited amounts for up to 50 years.

Secured investments: Investments secured on the borrower's assets, which limits the potential losses in the event of insolvency. The amount and quality of the security will be a key factor in the investment decision. Covered bonds and reverse repurchase agreements with banks and building societies are exempt from bail-in. Where there is no investment specific credit rating, but the collateral upon which the investment is secured has a credit rating, the higher of the collateral credit rating and the counterparty credit rating will be used. The combined secured and unsecured investments with any one counterparty will not exceed the cash limit for secured investments.

Banks and building societies (unsecured): Accounts, deposits, certificates of deposit and senior unsecured bonds with banks and building societies, other than multilateral development banks. These investments are subject to the risk of credit loss via a bail-in should the regulator determine that the bank is failing or likely to fail. See below for arrangements relating to operational bank accounts.

Registered providers (unsecured): Loans to, and bonds issued or guaranteed by, registered providers of social housing or registered social landlords, formerly known as housing associations. These bodies are regulated by the Regulator of Social Housing (in England), the Scottish Housing Regulator, the Welsh Government and the Department for Communities (in Northern Ireland). As providers of public services, they retain the likelihood of receiving government support if needed.

Money market funds: Pooled funds that offer same-day or short notice liquidity and very low or no price volatility by investing in short-term money markets. They have the advantage over bank accounts of providing wide diversification of investment risks, coupled with the services of a professional fund manager in return for a small fee. Although no sector limit applies to money market funds, the Council will take care to

diversify its liquid investments over a variety of providers to ensure access to cash at all times.

Strategic pooled funds: Bond, equity and property funds that offer enhanced returns over the longer term but are more volatile in the short term. These allow the Council to diversify into asset classes other than cash without the need to own and manage the underlying investments. Because these funds have no defined maturity date, but are available for withdrawal after a notice period, their performance and continued suitability in meeting the Council's investment objectives will be monitored regularly.

Real estate investment trusts: Shares in companies that invest mainly in real estate and pay the majority of their rental income to investors in a similar manner to pooled property funds. As with property funds, REITs offer enhanced returns over the longer term, but are more volatile especially as the share price reflects changing demand for the shares as well as changes in the value of the underlying properties.

Other investments: This category covers treasury investments not listed above, for example unsecured corporate bonds and company loans. Non-bank companies cannot be bailed-in but can become insolvent placing the Council's investment at risk.

Operational bank accounts: The Council may incur operational exposures, for example through current accounts, collection accounts and merchant acquiring services, to any UK bank with credit ratings no lower than A-. The Bank of England has stated that in the event of failure, banks with assets greater than £25 billion are more likely to be bailed-in than made insolvent, increasing the chance of the Council maintaining operational continuity.

The Council's business bank account provider is Lloyds bank plc. It may be necessary to hold liquid funds in the main business account overnight, for example where grant payments are received prior to allocation. Therefore, there is no limit on amounts that can be held with Lloyds. However, the Council monitors its operational accounts on a daily basis, transferring any surplus funds to investment accounts and there for minimising the amount held in the operational bank account at any time.

Risk assessment and credit ratings: Credit ratings are obtained and monitored by the Council's treasury advisers, who will notify changes in ratings as they occur. The credit rating agencies in current use are listed in the Treasury Management Practices document. Where an entity has its credit rating downgraded so that it fails to meet the approved investment criteria then:

- no new investments will be made,
- any existing investments that can be recalled or sold at no cost will be, and
- full consideration will be given to the recall or sale of all other existing investments with the affected counterparty.

Where a credit rating agency announces that a credit rating is on review for possible downgrade (also known as "negative watch") so that it may fall below the approved rating

criteria, then only investments that can be withdrawn on the next working day will be made with that organisation until the outcome of the review is announced. This policy will not apply to negative outlooks, which indicate a long-term direction of travel rather than an imminent change of rating.

Other information on the security of investments: The Council understands that credit ratings are good, but not perfect, predictors of investment default. Full regard will therefore be given to other available information on the credit quality of the organisations in which it invests, including credit default swap prices, financial statements, information on potential government support, reports in the quality financial press and analysis and advice from the Council's treasury management adviser. No investments will be made with an organisation if there are substantive doubts about its credit quality, even though it may otherwise meet the above criteria.

Reputational aspects: The Authority is aware that investment with certain counterparties, while considered secure from a purely financial perspective, may leave it open to criticism, valid or otherwise, that may affect its public reputation, and this risk will therefore be considered when making investment decisions.

When deteriorating financial market conditions affect the creditworthiness of all organisations, as happened in 2008, 2020 and 2022, this is not generally reflected in credit ratings, but can be seen in other market measures. In these circumstances, the Authority will restrict its investments to those organisations of higher credit quality and reduce the maximum duration of its investments to maintain the required level of security. The extent of these restrictions will be in line with prevailing financial market conditions. If these restrictions mean that insufficient commercial organisations of high credit quality are available to invest the Authority's cash balances, then the surplus will be deposited with the UK Government, or with other local authorities. This will cause investment returns to fall but will protect the principal sum invested.

Investment limits: The Council's revenue reserves available to cover investment losses are forecast to be £30.9 million on 31 March 2024 and £30.1 million by 31 March 2025. In order that no more than 30.0% of available reserves will be put at risk in the case of a single default, the maximum that will be lent to any one organisation (other than the UK Government) will be £10.0 million. A group of entities under the same ownership will be treated as a single organisation for limit purposes.

Limits are also placed on fund managers, investments in brokers' nominee accounts and foreign countries as below. Investments in pooled funds and multilateral development banks do not count against the limit for any single foreign country since the risk is diversified over many countries.

Table 4: Additional investment limits	Cash limit
Any group of pooled funds under the same management	£10 million per manager
Negotiable instruments held in a broker's nominee account	£13 million per broker
Foreign countries	£5 million per country

Liquidity management: The Council performs regular cashflow forecasts to determine the maximum period for which funds may prudently be committed. The forecast is compiled on a prudent basis to minimise the risk of the Council being forced to borrow on unfavourable terms to meet its financial commitments. Limits on long-term investments are set by reference to the Council's medium-term financial plan and cash flow forecast.

Liquid cash will be spread to optimise access to cash in the event of operational difficulties at any one provider (e.g., bank accounts and money market funds).

5. Treasury Management Prudential Indicators

The Council measures and manages its exposures to treasury management risks using the following indicators.

The Council measure its exposure to credit risk by monitoring the overall average credit rating / credit score of its investment portfolio. This is calculated by applying a score to each investment (AAA=1, AA+=2, etc.) and taking the arithmetic average, weighted by the size of each investment. Unrated investments are assigned a score based on their perceived risk. The 2023/24 level remains one 'notch' above the Council's minimum individual counterparty rating of A-.

Table 5: Credit risk indicator	Target
Portfolio average credit	A

The Council will measure of its exposure to liquidity risk by monitoring the amount of cash available to meet unexpected payments within a rolling three-month period, without additional borrowing.

Table 6: Liquidity risk indicator	Target
Total cash available within 3 months	£3.0 million

Interest rate risk indicator is set to measure the Council's exposure to interest rate risk by monitoring the impact that a 1% rise or fall in interest rates would have on the Council's income.

As the Council's borrowing is expected to be nil or small over the coming year investments will have the predominant impact on this indicatory. This indicator for 2024/25 reflects the expectation that a majority of the Council's treasury investments will not be held at fixed rates of interest.

Table 8: Interest rate risk indicator	Limit
Revenue budget impact of a 1% change in rates	£0.451 million pa

The impact of a change in interest rates is calculated on the assumption that maturing loans and investments will be replaced at new market rates.

Maturity structure of borrowing: This indicator is set to control the Council’s exposure to refinancing risk. The upper and lower limits on the maturity structure of borrowing will be:

Table 9: Refinancing rate risk indicator	Upper limit	Lower limit
Under 12 months	100%	0%
12 months and within 24 months	100%	0%
24 months and within 5 years	100%	0%
5 years and within 10 years	100%	0%
10 years and above	100%	0%

As the Council has relatively modest and short term overall borrowing requirement there is no significant refinancing risk. At present the Council would wish to retain maximum flexibility as to the periods in which it borrows over. The indicator will be kept under review to ensure that it remains suitable.

Time periods start on the first day of each financial year. The maturity date of borrowing is the earliest date on which the lender can demand repayment.

Long-term treasury management investments: The purpose of this indicator is to control the Council’s exposure to the risk of incurring losses by seeking early repayment of its investments. The prudential limits on the long-term treasury management investments will be:

Table 10: Price risk indicator	2023/24	2024/25	2025/26	No fixed date
Limit on principal invested beyond year end	£10.0 million	£10.0 million	£10.0 million	£10.0 million

Long-term investments with no fixed maturity date include strategic pooled funds and real estate investment trusts but exclude money market funds and bank accounts with no fixed maturity date as these are considered short-term.

6. Related Matters

The CIPFA Code requires the Council to include the following in its treasury management strategy.

Financial derivatives: Local authorities have previously made use of financial derivatives embedded into loans and investments both to reduce interest rate risk (e.g. interest rate collars and forward deals) and to reduce costs or increase income at the

expense of greater risk (e.g. LOBO loans and callable deposits). The general power of competence in section 1 of the *Localism Act 2011* removes much of the uncertainty over local authorities' use of standalone financial derivatives (i.e., those that are not embedded into a loan or investment).

The Council will only use standalone financial derivatives (such as swaps, forwards, futures and options) where they can be clearly demonstrated to reduce the overall level of the financial risks that the Council is exposed to. Additional risks presented, such as credit exposure to derivative counterparties, will be considered when determining the overall level of risk. Embedded derivatives, including those present in pooled funds and forward starting transactions, will not be subject to this policy, although the risks they present will be managed in line with the overall treasury risk management strategy.

Financial derivative transactions may be arranged with any organisation that meets the approved investment criteria, assessed using the appropriate credit rating for derivative exposures. An allowance for credit risk calculated using the methodology in the Treasury Management Practices document will count against the counterparty credit limit and the relevant foreign country limit.

In line with the CIPFA Code, the Council will seek external advice and will consider that advice before entering into financial derivatives to ensure that it fully understands the implications.

Markets in Financial Instruments Directive: The Council has opted up to professional client status with its providers of financial services, including advisers, banks, brokers and fund managers, allowing it access to a greater range of services but without the greater regulatory protections afforded to individuals and small companies. Given the size and range of the Council's treasury management activities, the Chief Finance Officer believes this to be the most appropriate status. The Council is required to have at least £10.0 million in investments at all times in order to maintain profession status.

7. Financial Implications

The budget for investment income in 2024/25 is £0.8 million, based on an average investment portfolio of £18.5 million at an interest rate of 5.02%.

If actual levels of investments and borrowing, or actual interest rates, differ from those forecasts, performance against budget will be correspondingly different.

8. Other Options Considered

The CIPFA Code does not prescribe any particular treasury management strategy for local authorities to adopt. The Chief Finance Officer, having consulted the Portfolio holder for Finance & Governance, believes that the above strategy represents an appropriate balance between risk management and cost effectiveness. Some alternative strategies, with their financial and risk management implications, are listed below.

Table 11: Options Considered

Alternative	Impact on income and expenditure	Impact on risk management
Invest in a narrower range of counterparties and/or for shorter times	Interest income will be lower	Lower chance of losses from credit related defaults, but any such losses may be greater
Invest in a wider range of counterparties and/or for longer times	Interest income will be higher	Increased risk of losses from credit related defaults, but any such losses may be smaller
Borrow additional sums at long-term fixed interest rates	Debt interest costs will rise; this is unlikely to be offset by higher investment income	Higher investment balance leading to a higher impact in the event of a default; however long-term interest costs may be more certain
Borrow short-term or variable loans instead of long-term fixed rates	Debt interest costs will initially be lower	Increases in debt interest costs will be broadly offset by rising investment income in the medium term, but long-term costs may be less certain
Reduce level of borrowing	Saving on debt interest is likely to exceed lost investment income	Reduced investment balance leading to a lower impact in the event of a default; however long-term interest costs may be less certain

Arlingclose Economic & Interest Rate Forecast December 2023

Underlying assumptions:

- *UK inflation and wage growth remain elevated but have eased over the past two months fuelling rate cuts expectations. Near-term rate cuts remain unlikely, although downside risks will increase as the UK economy likely slides into recession.*
- *The MPC's message remains unchanged as the Committee seeks to maintain tighter financial conditions. Monetary policy will remain tight as inflation is expected to moderate to target slowly, although some wage and inflation measures are below the Bank's last forecasts.*
- *Despite some deterioration in activity data, the UK economy remains resilient in the face of tighter monetary policy. Recent data has been soft but mixed; the more timely PMI figures suggest that the services sector is recovering from a weak Q3. Tighter policy will however bear down on domestic and external activity as interest rates bite.*
- *Employment demand is easing. Anecdotal evidence suggests slowing recruitment and pay growth, and we expect unemployment to rise further. As unemployment rises and interest rates remain high, consumer sentiment will deteriorate. Household and business spending will therefore be weak.*
- *Inflation will fall over the next 12 months. The path to the target will not be smooth, with higher energy prices and base effects interrupting the downtrend at times. The MPC's attention will remain on underlying inflation measures and wage data. We believe policy rates will remain at the peak for another 10 months, or until the MPC is comfortable the risk of further 'second-round' effects has diminished.*
- *Maintaining monetary policy in restrictive territory for so long, when the economy is already struggling, will require significant loosening in the future to boost activity.*
- *Global bond yields will remain volatile. Markets are currently running with expectations of near-term US rate cuts, fuelled somewhat unexpectedly by US policymakers themselves. Term premia and bond yields have experienced a marked decline. It would not be a surprise to see a reversal if data points do not support the narrative, but the current 10-year yield appears broadly reflective of a lower medium-term level for Bank Rate.*
- *There is a heightened risk of fiscal policy and/or geo-political events causing substantial volatility in yields.*

Forecast:

- *The MPC held Bank Rate at 5.25% in December. We believe this is the peak for Bank Rate.*

- The MPC will cut rates in the medium term to stimulate the UK economy but will be reluctant to do so until it is sure there will be no lingering second-round effects. We see rate cuts from Q3 2024 to a low of around 3% by early-mid 2026.
- The immediate risks around Bank Rate have become more balanced, due to the weakening UK economy and dampening effects on inflation. This shifts to the downside in the short term as the economy weakens.
- Long-term gilt yields are now substantially lower. Arlingclose expects yields to be flat from here over the short-term reflecting medium term Bank Rate forecasts. Periodic volatility is likely.

	Current	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26
Official Bank Rate													
Upside risk	0.00	0.00	0.25	0.25	0.50	0.50	0.50	0.50	0.50	0.75	0.75	1.00	1.00
Central Case	5.25	5.25	5.25	5.25	5.00	4.75	4.25	4.00	3.75	3.50	3.25	3.00	3.00
Downside risk	0.00	0.00	-0.25	-0.50	-0.75	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00
3-month money market rate													
Upside risk	0.00	0.00	0.25	0.25	0.50	0.50	0.50	0.50	0.50	0.75	0.75	1.00	1.00
Central Case	5.40	5.40	5.40	5.30	5.15	4.80	4.30	4.10	3.80	3.50	3.25	3.05	3.05
Downside risk	0.00	0.00	-0.25	-0.50	-0.75	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00
5yr gilt yield													
Upside risk	0.00	0.25	0.75	0.85	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Central Case	3.77	3.75	3.75	3.75	3.70	3.60	3.50	3.50	3.40	3.30	3.30	3.30	3.35
Downside risk	0.00	-0.25	-0.75	-0.85	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00
10yr gilt yield													
Upside risk	0.00	0.25	0.75	0.85	0.85	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Central Case	3.72	3.75	3.80	3.80	3.80	3.80	3.80	3.80	3.75	3.65	3.60	3.65	3.70
Downside risk	0.00	-0.25	-0.75	-0.85	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00
20yr gilt yield													
Upside risk	0.00	0.25	0.75	0.85	0.85	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Central Case	4.16	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.20	4.25
Downside risk	0.00	-0.25	-0.75	-0.85	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00
50yr gilt yield													
Upside risk	0.00	0.25	0.75	0.85	0.85	0.90	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Central Case	3.76	3.80	3.85	3.90	3.90	3.90	3.90	3.90	3.90	3.90	3.95	3.95	3.95
Downside risk	0.00	-0.25	-0.75	-0.85	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00

PWLB Standard Rate = Gilt yield + 1.00%

PWLB Certainty Rate = Gilt yield + 0.80%

PWLB HRA Rate = Gilt yield + 0.40%

UK Infrastructure Bank Rate = Gilt yield + 0.40%

INVESTMENT STRATEGY

2024/25

March 2024

1. Introduction

The Council invests its cash for three broad purposes:

- (i) because it has surplus funds as a result of its day-to-day activities, for example when income is received in advance of expenditure (known as **treasury management investments**);
- (ii) to support local public services by lending to or buying shares in other organisations (**service investments**); and
- (iii) to earn investment income (known as **commercial investments** where this is the main purpose).

This investment strategy meets the requirements of statutory guidance issued by the government in January 2018.

2. Treasury Management Investments

The Council typically receives its income (e.g. from taxes and grants) before it pays for its expenditure (e.g. through payroll and invoices). It also holds reserves for future expenditure and collects local taxes on behalf of other local authorities and central government.

These activities, plus the timing of borrowing decisions, lead to a cash surplus which is invested in accordance with guidance from the Chartered Institute of Public Finance and Accountancy.

The balance of the Council's treasury management investments is expected to fluctuate between £13.0m and £32.4m during the 2024/25 financial year.

Contribution: The contribution that these investments make to the objectives of the Council is to support effective treasury management activities.

Further details: The Council's policies and its plan for 2024/25 for treasury management investments are covered in a separate document, the treasury management strategy, at Annex 1.

3. Service Investments: Loans

Contribution: The Council lends money to its subsidiaries to support local public services and stimulate local economic growth. The largest loan currently is to a Council Subsidiary to provide a vehicle for economic regeneration to support corporate objectives.

Security: The main risk when making service loans is that the borrower will be unable to repay the principal lent and/or the interest due. In order to limit this risk, and ensure that total exposure to service loans remains proportionate to the size of the Council, upper limits on the outstanding loans to each category of borrower have been set as follows:

Table 1: Loans for service purposes	31.3.2024 Estimated 2023/24			2024/25
	Balance Owing	Loss Allowance	Net Balance In Council Accounts	Approved Limit
Category of borrower	£000	£000	£000	£000m
Subsidiary ¹	13,258	(3,880)	9,378	13,258
TOTAL	13,258	(3,880)	9,378	13,258

Note 1 Greensand Holdings Limited

Loss allowance: Accounting standards require the Council to set aside loss allowance for loans, reflecting the likelihood of non-payment. The figures for loans in the Council's statement of accounts are shown net of this loss allowance. However, the Council makes every reasonable effort to collect the full sum lent and has appropriate credit control arrangements in place to recover overdue repayments.

Risk assessment: The Council assesses and mitigates the risk of loss before entering into and whilst holding service loans by:

- Assessing the markets in which the Council is looking to invest, to ascertain why the market is currently not delivering the outcomes the Council requires through its Corporate Objectives. If this is due to financial reasons the Council will then assess whether a service loan would provide the means to achieve the desired outcome.
- Upon determining that a service loan may be required, the Council will then seek external advice where necessary, this will include the use of external legal, financial and tax advice as appropriate.
- A credit check and analysis of the beneficiary's financial statements will also be carried out to determine their financial strength. Loans will only be entered into should the beneficiary be of a suitable strength, and additional security may be sought, for instance, through a charge on land, should the Council require this.
- In order to ensure the objectives of the Council are delivered, the terms of the loan may oblige the borrower to meet certain criteria, for instance to provide additional affordable housing on a housing development.
- Where possible, the Council will also place a representative on the board of the project, in order to ensure effective on-going monitoring of the project is maintained; and

- Once the loan has been made, the Council will continue to monitor credit ratings and financial statements of the beneficiary to ensure loss adjustments can be made accurately and in a timely manner should the beneficiary's credit rating or financial performance decrease.

4. Service Investments: Shares

Contribution: The Council invests in the shares of its subsidiaries to support local public services and stimulate local economic growth.

The Council has a 10% share in Pathway for Care Limited: a supported living company that provides housing and care to people with complex health needs. In January 2024 the company was placed into administration.

Security: Shares can fall in value meaning that the initial outlay may not be recovered. In order to limit this risk, upper limits on the sum invested in each category of shares have been set as follows:

Table 2: Shares held for service purposes	31.3.2023 Estimated value			2024/25
	Amounts Invested	Gains Or Losses	Value In Accounts ¹	Approved Limit
Category of company	£000	£000	£000	£000
Subsidiaries	1,100	-	1,100	1,100
TOTAL	1,100	-	1,100	1,100

Note 1: Before provision for credit loss.

Risk assessment: The Council assesses the risk of loss before entering into and whilst holding shares by:

- Assessing the markets in which the Council is looking to invest, to ascertain why the market is currently not delivering the outcomes the Council requires through its Corporate Objectives. If this is due to financial reasons the Council will then assess whether a service loan would provide the means to achieve the desired outcome;
- A credit check and analysis of the beneficiary's financial statements will also be carried out to determine their financial strength. Shares will only be bought if the beneficiary is of a suitable strength, and additional security may be sought, for instance, through a charge on land, should the Council require this; and
- In order to ensure the objectives of the Council are delivered, the terms of the agreement may oblige the company to meet certain criteria, as the council has significant influence.

Non-specified Investments: Shares are the only investment type that the Council has identified that meets the definition of a non-specified investment in the government

guidance. The limits above on share investments are therefore also the Council's upper limits on non-specified investments.

The Council has not adopted any procedures for determining further categories of non-specified investment since none are likely to meet the definition.

5. Commercial Investments: Property

The Department for Levelling Up, Housing and Communities defines property to be an investment if it is held primarily or partially to generate a profit.

Contribution: The Council has invested in local commercial and residential property with the primary intention for regeneration and housing development either directly or indirectly within the wider region by providing additional income that is then spent on regeneration, economy and housing within the local area.

Properties that fall into the investment asset category are listed in the table below.

Table 3: Property held for investment purposes	Actual	31.3.2023		31.3.2024	
	Purchase Cost	Gains or (Losses)	Estimated Value	Gains or (Losses)	Estimated Value
Property	£000	£000	£000	£000	£000
Units 1-5 Redhill Distribution Centre, Salbrook Road, Salfords RH1 5DY	15,903	(973)	15,882	(1,387)	14,495
Regent House, 1-3 Queensway, Redhill, RH1 1QT	16,313	(450)	11,983	(1,074)	10,903
Forum House, 41-51 Brighton Road, Redhill RH1 6YS	6,067	(170)	5,072	(980)	4,092
Beech House, 35 London Road, Reigate RH2 9PZ	6,305	(122)	3,789	(923)	2,866
55-57, 59, 61 & 63 Victoria Road, Horley RH6 7QH	1,135	(22)	1,019	(50)	969
TOTAL	45,725	(1,737)	37,745	(4,414)	33,331

Security: In accordance with government guidance, the Council considers a property investment to be secure if its accounting valuation is at or higher than the debt currently outstanding for the asset. The Council did not borrow to fund the above assets and is not expected to require significant borrowing for them in future. Therefore, the Council is content that the properties meet the definition of being secure.

The condition of the Council's property portfolio is closely monitored by the Property Services Team, and the cost of maintaining the buildings is covered by the approved maintenance budget.

Asset values are reviewed by an independent valuer on a regular basis, investments properties valuations are carried out annually.

Liquidity: Compared with other investment types, property is relatively difficult to sell and convert to cash at short notice and can take a considerable period to sell in certain market conditions. The Council recognised that these assets are illiquid and therefore ensures that adequate cash is available in other more liquid investments in order to meet short term cash flow needs.

6. Proportionality

Whilst the Council is dependent on some profit generating investment activity from treasury management and commercial property investments to achieve a balanced revenue budget, this amounts to less than 1% of the overall gross revenue budget and therefore is considered proportionate.

The assumptions around profit-generating investment activity are reviewed as part of the annual budget monitoring process and, if necessary, revised as part of the following year's budget forecasts.

7. Borrowing in Advance of Need

Government guidance is that local authorities must not borrow more than or in advance of their needs purely in order to profit from the investment of the extra sums borrowed.

The Council is not planning to borrow in advance of need purely to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward-approved CFR estimates and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.

8. Capacity, Skills and Culture

Elected Members and officers:

The Council arranges annual training for Members on Treasury Management and the current borrowing and investment environment; the most recent training took place in March 2024 led by the Council's treasury advisers and the Finance team. Participants are encouraged to ask questions to further their understanding of the approach to decision-making for both investments and borrowing. Further briefings may be arranged in consultation with lead Members.

The Council employs professionally qualified and experienced staff in senior positions with responsibility for making capital expenditure, borrowing and investment decisions.

Where Council officers do not have the knowledge and skills required, use is made of external advisers and consultants that are specialists in their field. The Council currently employs Arlingclose Limited as treasury management advisers. This approach is more cost effective and practical than employing such staff directly and ensures that the Council has access to knowledge and skills commensurate with its risk appetite.

Commercial deals: Officers with relevant professional disciplines are involved in negotiating such arrangements and are aware of the core principles of the prudential framework and of the regulatory regime within which local authorities operate and considerable due diligence is undertaken in all instances. Alongside the internal teams the Council also uses, where appropriate, external advisors to complete due diligence processes.

Corporate governance: All decisions regarding new loans or investments of this nature are considered by the Chief Finance Officer before being recommended for approval at Council. Reports to Members will have been through a fully costed business case that includes any investment/loan requirements and financial/risk implications. A significant amount of due diligence work is undertaken in each case to ensure that business cases are robust.

9. Investment Indicators

The Council has set quantitative indicators to allow Members and the public to assess the Council's total risk exposure as a result of its investment decisions.

Total risk exposure: The first indicator shows total exposure to potential investment losses. This includes amounts the Council is contractually committed to lend but have yet to be drawn down.

Table 4: Total investment exposure	31.03.2023 Estimated	31.03.2024 Estimated	31.03.2025 Forecast
Total investment exposure	£000	£000	£000
Treasury management investments	16,000	16,500	13,000
Service investments: Loans	8,982	9,378	6,633
Service investments: Shares (at cost)	1,100	1,100	1,100
Commercial investments: Property	37,745	33,331	29,433
TOTAL INVESTMENTS	63,827	60,309	50,166
Commitments to lend	-	652	656

Table 4: Total investment exposure	31.03.2023 Estimated	31.03.2024 Estimated	31.03.2025 Forecast
Total investment exposure	£000	£000	£000
TOTAL EXPOSURE	63,827	60,961	50,822

How investments are funded: Government guidance is that these indicators should include information about how investments are funded.

Since the Council does not normally associate particular assets with particular liabilities, this guidance is not straightforward to comply with. To date these investments have been funded by usable reserves and income received in advance of expenditure. It is planned that this approach will continue in the medium term as internal resources allow.

Rate of return received: This indicator shows the investment income received less the associated costs, including the cost of borrowing where appropriate, as a proportion of the sum initially invested.

Note that due to the complex local government accounting framework, not all recorded gains and losses affect the revenue account in the year they are incurred.

Table 5: Investment rate of return (net of all costs)			
	2022/23 Actual	2023/24 Forecast	2024/25 Forecast
Investments net rate of return			
Treasury management investments	2.21%	2.49%	2..36%
Service investments: Loans	2.69%	2.55%	2.42%
Service investments: Shares	-	-	-
Commercial investments: Property	5.92%	5.66%	5.41%

The indicators used to report on the risks and opportunities associated with investment decisions will be kept under review as the Council's Investment Strategy and activities evolve over time.

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CAPITAL STRATEGY

2024/25

March 2024

1. Introduction

This capital strategy report sets out a high-level overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of local public services, along with an overview of how associated risk is managed and the implications for future financial sustainability.

Decisions made this year on capital and treasury management will have financial consequences for the Council for many years into the future. They are therefore subject to both a national regulatory framework and to local policy framework, summarised in this report.

2. Capital Expenditure and Financing

Capital expenditure is where the Council spends money on assets, such as property or vehicles, that will be used for more than one year. In local government this includes spending on assets owned by other bodies, and loans and grants to other bodies enabling them to buy assets.

In 2024/25, the Council is planning capital expenditure of £16.05 million as summarised below:

Table 1: Prudential Indicator: Estimates of Capital Expenditure	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget	2026/27 budget
	£000	£000	£000	£000	£000
Capital Programme 2024/25 to 2028/29	21,156	4,339	10,241	3,938	4,856
Other fully-funded schemes ¹	-	6,434	5,807	2,727	-
TOTAL	21,156	10,773	16,048	6,665	4,856

1. Schemes approved by Executive in March 2023 that are to be funded through the Community Infrastructure Levy (CIL).

Setting the Capital programme: Service Teams bid to include projects in the Capital Programme as part of the service & financial planning process in preparation for setting the Revenue Budget and Capital Programme and refreshing the Medium-Term Financial Plan each year.

The Management Team appraises all bids and makes recommendations to the Executive. The final Capital Programme is then presented to Executive and to Council

for approval by 12 March each year. Additional capital requirements and opportunities identified through the year are considered on their merits in line with the above governance controls. Any in year changes to the capital budget will be made in accordance with the constitution, including appropriate approval by Executive and Council.

All capital expenditure must be financed, either from external sources (such as government grants, section 106, community infrastructure levy and other contributions), the Council's own resources (revenue contributions, reserves and capital receipts) or borrowing.

The planned financing of the above expenditure is as follows:

Table 2: Capital financing	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget	2026/27 budget
	£000	£000	£000	£000	£000
Grants & Contributions	4,414	8,578	2,600	1,520	1,700
Capital Receipts – received in year	-	35,000	-	-	-
Capital Receipts Reserve	-	3,655	-	-	-
Revenue Resources	124	809	-	-	-
Debt	16,618	(37,269)	13,488	5,145	3,156
TOTAL	21,156	10,773	16,048	6,665	4,856

The Council's total outstanding borrowing is measured by the capital financing requirement (CFR). This increases with any new capital expenditure financed by borrowing and reduces with any minimum revenue provision (MRP) payments or any use of capital receipts to replace borrowing.

The Council approves the MRP policy each year as part of the Annual Treasury Management Strategy.

Table 3: Replacement of prior years' debt finance	2022/23 actual	2023/24 forecast	2024/25 budget	2025/26 budget	2026/27 budget
	£000	£000	£000	£000	£000
Minimum revenue provision (MRP)	584	629	1,038	1,054	1,060
Capital receipts	-	35,000	-	-	-
TOTAL	584	35,629	1,038	1,054	1,060

The Minimum Revenue Provision Policy is set out at Appendix 1.

The CFR is expected to reduce by £1.0 million during 2024/25. Based on the above figures for expenditure and financing, the Council's forecast CFR is as follows:

Table 4: Prudential Indicator: Estimates of Capital Financing Requirement	31.3.2023 Actual	31.3.2024 Forecast	31.3.2025 Budget	31.3.2026 Budget	31.3.2027 Budget
	£000	£000	£000	£000	£000
TOTAL CFR	93,300	72,600	79,300	80,800	82,100

Asset management: To ensure that capital assets continue to be of long-term use, the Council has an Asset Management Strategy in place. This Strategy is used to identify opportunities to expand the Council's property assets or dispose of surplus assets where appropriate.

It also allows for a review of the state of repair of assets and provides the basis for recommending a rolling investment programme in property assets to maintain and enhance the income derived from them.

The Council's Asset Management Strategy is summarised at Appendix 3.

Asset disposals: When a capital asset is no longer needed, it may be sold so that the proceeds, known as capital receipts, can be spent on new assets or to repay debt.

Repayments of capital grants, loans and investments also generate capital receipts.

There are currently no plans for significant capital receipts to be received in 2024/25 or 2025/26.

The Council's Flexible Use of Capital Receipts Strategy is set out at Appendix 2.

3. Treasury Management

Treasury management is concerned with keeping sufficient but not excessive cash available to meet the Council's spending needs, while managing the risks involved. Surplus cash is invested until required, while a shortage of cash will be met by borrowing, to avoid excessive credit balances or overdrafts in the bank current account.

This Council is typically cash rich in the short-term as revenue income is received before it is used. Revenue cash surpluses are offset against capital cash shortfalls to reduce overall borrowing. At 31 March 2024 the Council had no loans.

Borrowing strategy: The Council's main objectives when borrowing is to achieve a low but certain cost of finance while retaining flexibility should plans change in future.

The Council has historically been largely debt free but has borrowed on a temporary basis to fund short term cash flow shortfalls. As the Council has a modest and relatively short-lived expected future borrowing requirement short term borrowing is expected to continue to be the most cost-effective option.

The Council does not borrow to invest for the primary purpose of financial return and therefore retains full access to the Public Works Loans Board if needed.

Projected levels for total outstanding debt (which comprises borrowing) are shown below, compared with the capital financing requirement.

Table 5: Prudential Indicator: Gross Debt and the Capital Financing Requirement	31.3.2023 Actual	31.3.2024 Forecast	31.3.2025 Budget	31.3.2026 Budget	31.3.2027 Budget
	£000	£000	£000	£000	£000
Debt	7,000	-	-	-	-
Capital Financing Requirement	93,300	72,600	79,300	80,800	82,100

Statutory guidance is that debt should remain below the capital financing requirement, except in the short-term. As can be seen from the table above, the Council expects to comply with this in the medium term.

Liability Benchmark: To compare the Council's actual borrowing against an alternative strategy, a Liability Benchmark has been calculated showing the lowest risk level of borrowing.

This assumes that cash and investment balances are kept to a minimum level of £13.0 million at each year-end.

The benchmark currently shows the Council does expect to borrow by 31 March 2024. A borrowing need of £3.1 million is forecast 31 March 2025, increasing to £11.0 million by 31 March 2027.

The Council plans to borrow at or as near as possible to the Liability Benchmark in future as is illustrated by the table below.

Table 6: Borrowing and the Liability Benchmark	31.3.2023 actual	31.3.2024 actual	31.3.2025 budget	31.3.2026 budget	31.3.2027 budget
	£000	£000	£000	£000	£000
Outstanding/ estimated borrowing	7,000	-	-	-	-
Liability benchmark	(9,000)	(3,500)	3,100	11,600	11,000

Affordable Borrowing Limit: The Council is legally obliged to set an affordable borrowing limit (also termed the authorised limit for external debt) each year. In line with statutory guidance, a lower “operational boundary” is also set as a warning level should debt approach the limit.

Table 7: Prudential Indicators: Authorised limit and operational boundary for external debt	2023/24 limit	2024/25 limit	2025/26 limit	2026/27 limit
	£000	£000	£000	£000
Authorised limit – borrowing	40,000	41,000	42,000	43,000
Operational boundary – borrowing	35,000	36,000	37,000	38,000

Treasury investment strategy: Treasury investments arise from receiving cash before it is paid out again. Investments made for service reasons or for pure financial gain are not generally considered to be part of treasury management.

The Council’s policy on treasury investments is to prioritise security and liquidity over yield, that is to focus on minimising risk rather than maximising returns.

Cash that is likely to be spent in the near term is invested securely, for example with the government, other local authorities or selected high-quality money market funds and banks, to minimise the risk of loss, the Council may request its money back at short notice.

Table 8: Treasury management investments	31.3.2023 actual	31.3.2024 forecast	31.3.2025 budget	31.3.2026 budget	31.3.2027 budget
	£000	£000	£000	£000	£000
Near-term investments	6,100	6,500	3,000	3,000	3,000
Longer-term investments	10,000	10,000	10,000	10,000	10,000
TOTAL	16,100	16,500	13,000	13,000	13,000

The Council is required to have at least £10 million in investments at all times to retain a desired professional status when working with financial intermediaries. As this is a constant requirement that remains indefinitely it is considered a long-term investment balance, although it may be invested in short-term products.

Risk management: The effective management and control of risk are prime objectives of the Council's treasury management activities. The treasury management strategy therefore sets out various indicators and limits to constrain the risk of unexpected losses and details the extent to which financial derivatives may be used to manage treasury risks.

In managing the overall programme of investment there are inherent risks associated such as changes in interest rates, credit risk of counter parties.

Accordingly, the Council will ensure that robust due diligence procedures cover all external capital investment. Where possible contingency plans will be identified at the outset and enacted when appropriate.

No project or investment will be approved where the level of risk - determined by the Council or Chief Finance Officer, as appropriate - is unacceptable.

Governance: Decisions on treasury management investment and borrowing are made daily and are therefore delegated to the Chief Finance Officer and Finance staff, who must act in line with the Treasury Management Strategy approved by Council.

Quarterly reports on treasury management activity are presented to the Overview & Scrutiny Committee and Executive.

4. Investments for Service Purposes

The Council makes investments to assist local public services, to stimulate local economic growth.

The largest loan currently is to a Council subsidiary to provide a vehicle for both the delivery of housing and infrastructure to seek to meet the corporate objectives of the Council.

Total property investments are currently valued at £33.3 million with the largest being the Redhill Distribution Centre which provides a net return after costs of 5.41%.

Risk management: The Council is exposed to a range of risks with regard to the continued affordability and delivery of it's the Capital Programme including:

- Financial risks related to the investment of the Council's assets, cash flow and market volatility;
- Macroeconomic risks related to the growth or decline of the local economy, interest rates, inflation and the wider national and global economy;
- Reputational risks related to the Council's dealings and interests, and the impact of adverse outcomes on the Council's reputation and public perception; and

- Governance risks related to ensuring that prudence and careful consideration are prominent in the Council's decision-making.

Due diligence is undertaken on acquisitions and external advice is sought wherever necessary.

When making decisions - particularly around assets which generate a return - due diligence processes include second opinion on asset values, site visits, surveys and market intelligence. They also include risk analysis and sensitivity analysis in order to model how affordability is impacted by stress testing key underlying assumptions. Consideration is also made to the profile of the Council's asset base - and how effectively risk is spread across different asset types and sectors.

Governance: The Overview & Scrutiny Committee is responsible for scrutiny and governance of Treasury Management. It reviews the Treasury Management Strategy, and all Treasury Management reports. The Capital Programme is monitored by the Overview & Scrutiny Committee and the Executive as well as receiving all Treasury Management reports. Council approves the Treasury Management Strategy each year along with quarterly performance updates. The Chief Finance Officer is responsible for ensuring that adequate due diligence is carried out before investment is made.

Service teams bid to include projects in the Capital Programme as part of the service & financial planning process in preparation for setting the Revenue Budget and Capital Programme and updating the Medium-Term Financial Plan each year.

The officer Management Team appraises all bids and makes recommendations to the Executive. The recommended Capital Programme is then presented to Executive and to Council for approval by March each year.

Additional capital requirements and opportunities identified through the year are considered on their merits in line with the above governance controls. Any in year changes to the capital budget will be made in accordance with the constitution, including appropriate approval by Executive and/or Council. Due diligence is undertaken on acquisitions and external advice is sought wherever necessary.

Table 9: Prudential indicator: Net income from commercial and service investments to net revenue stream	2022/23 Actual	2023/24 Forecast	2024/25 Budget	2025/26 Budget	2026/27 Budget
Total net income from service and commercial investments - £000s	2,013	2,037	2,343	2,694	3,098
Proportion of net revenue stream - %	13.52%	9.18%	10.55%	12.14%	13.96%

5. Liabilities

The Council is committed to making future payments to cover its pension fund deficit valued at £1.89 million and has made provisions to cover risks such as insurance claims.

Governance: Decisions on incurring new discretionary liabilities are taken by service managers in consultation with the Chief Finance Officer.

The risk of liabilities crystallising and requiring payment is monitored by the Corporate Governance Group and reported quarterly to the Overview & Scrutiny Committee and the Executive.

6. Revenue Budget Implications

Although capital expenditure is not charged directly to the revenue budget, interest payable on loans and MRP are. The net annual charge is known as financing costs; this is compared to the net revenue stream i.e., the amount funded from council tax, business rates and general government grants.

Table 10: Prudential Indicator: Proportion of financing costs to net revenue stream	2022/23 Actual	2023/24 Actual	2024/25 Budget	2025/26 Budget	2026/27 Budget
Financing costs – in £000	607	788	1,820	1,852	1,874
Proportion of net revenue stream	4.08%	3.55%	8.20%	8.34%	8.44%

Sustainability: The Chief Finance Officer is satisfied that the proposed capital programme is prudent, affordable and sustainable because only modest amount of short-term borrowing is expected over a short-term period, and only modest MRP costs are expected over a more extended period.

7. Knowledge and Skills

The Finance Team has responsibility for preparing and on-going management of the capital and treasury management strategies and Capital Programme. The team is staffed by professionally qualified accountants with extensive local government finance experience. Team members attend all relevant training courses, workshops and events to ensure that their knowledge and skills are up to date and the Council is in a position to address all new technical developments.

Overall responsibility for capital and treasury activities lies with the Council's Chief Finance Officer who, in accordance with statute, is professionally qualified and is suitably experienced to hold the post.

The Council provides training to Members on an annual basis, which is delivered by Council Officers and external advisors. Members are updated on developments and any issues of significance throughout the year with information presented to the Overview & Scrutiny Committee, Audit Committee, Executive and at Member briefings.

The Council uses Arlingclose Limited, as its external Treasury Management advisors and recognises that that it is essential to engage with external providers of expertise in order to acquire access to specialist skills and resources. When looking at commercial activity transactions, officers from relevant professional disciplines from across the Council are involved in conducting due diligence exercises.

Alongside the internal resources the Council also uses, where appropriate, external advisors to complete the due diligence process.

Minimum Revenue Provision (MRP) Policy

1. The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the MRP). It is also allowed to undertake additional voluntary payments if required (Voluntary Revenue Provision - VRP).
2. MHCLG regulations require the full Council to approve an MRP Statement in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision.
3. Council is recommended to approve the following MRP Statement for 2024/25:

From 1 April 2008 for all unsupported borrowing (including PFI and finance leases) the Minimum Revenue Policy will be the Asset life method – MRP will be based on the estimated life of the assets, in accordance with the regulations and will be set aside in the year after the asset becomes operational. This will be a combination of the annuity method and straight-line method:

- Operational land and buildings - 50 years annuity method;
- Investment Properties - 50 years annuity method;
- General Fund Housing - 50 years straight line method;
- Infrastructure - 50 years straight line method;
- Plant and Equipment - 30 years straight line method;
- ICT- 5 years straight line method; and
- Vehicles - 8 years straight line method.

MRP on Capital Loans and Share Capital.

4. Under local authority capital accounting regulations loans to third parties for capital purposes and share capital are deemed to be capital expenditure of the authority. The Council has made loans to its companies (Greensand Holdings Limited and holds share capital in Pathway for Care Limited).
5. The Capital Financing Requirement (CFR) includes the value of the loans and investments (share capital). Funds repaid by the companies will be classed as capital receipts and offset against the CFR, which will reduce accordingly.
6. The repayments of principal will be set aside as capital receipts to finance the initial capital advance in lieu of making MRP. Also, an expected credit loss was recognised where deemed applicable.

7. In years where there is no principal repayment on loans that are investments for commercial purposes, MRP will be charged in accordance with the MRP policy for the assets funded by the loan, including where appropriate, delaying MRP until the year after the assets become operational. Sufficient MRP will be charged to ensure that the outstanding capital financing requirement (CFR) on the loan is no higher than the principal amount outstanding less the expected credit loss. This option was proposed by the government in its recent MRP consultation and in the Authority's view is consistent with the current regulations.

MRP Overpayments.

8. MHCLG Guidance includes the provision that any MRP charges made over the statutory minimum may be reclaimed in later years if deemed necessary or prudent. In order for these sums to be reclaimed, the MRP policy must disclose the cumulative overpayment made each year.
9. There are currently no plans to make any Voluntary Revenue Provision (VRP) payments or general MRP overpayments in 2024/25.

MRP Consultation and other changes

10. The Statutory Guidance on MRP has been amended to extend the treatment previously expected for finance leases to all leases. More information around IFRS 16 Implementation of IFRS 16 is detailed at Appendix 4.
11. The MRP charge for the year should be the element of the rent that goes to write down the lease liabilities. As this is generally the only element of the rent that has not already been charged to revenue, it is basically an instruction for the total charge to the General Fund Balance to equal the rents payable for the year.
12. On 21 December 2023 the government issued a further consultation document on proposed changes to the MRP Regulations building on the consultations carried out from November 2021 to February 2022 and June to July 2022 on proposals to strengthen the duty to make MRP with the objective of eradicating imprudent MRP policies relating to investment properties, capital loans and abatement by capital receipts. The latest proposed draft regulations remain substantively the same as previously consulted on in the June-July 2022 consultation, with some minor changes to reflect responses. This consultation closed on 16 February 2024 with the proposed revised regulations due to come into effect from 1 April 2024.
13. The revised regulations provide that:

- Capital receipts may not be used in place of the revenue charge for MRP;
 - Prudent MRP must be determined with respect to the authority's total Capital Financing Requirement; and
 - Capital loans can be excluded from the MRP requirement (if they are not made for commercial reasons) but a charge must be made for expected credit losses.
14. There are no substantive changes to the regulations, therefore the Council's current MRP policy remains in line with them.

Flexible Use of Capital Receipts Strategy

The Department for Levelling up, Housing and Communities (DLUHC) has confirmed the extension for the use of capital receipts to fund the revenue costs of transformation.

The flexible use of capital receipts is designed to offset the revenue cost of transformational projects which are expected to deliver future ongoing revenue savings for either the Council or other public sector delivery partners.

In order to take advantage of the change of use to capital receipts, the Council must act in accordance with the statutory guidance issued by the Secretary of State. This guidance requires the Council to prepare, publish and maintain a Flexible Use of Capital Receipts Strategy.

Qualifying expenditure.

Qualifying expenditure is expenditure on any project that is designed to generate ongoing revenue savings in the delivery of public services and/or transform service delivery to reduce costs and/or transform service delivery in a way that reduces costs or demand for services in future years for any of the public sector delivery partners.

Projects

There are currently no projects in place that plan to make use of the capital receipts flexibility. Should this change, details of the expected savings/service transformation will be provided to full Council alongside the impact on the Council's Prudential Indicators.

Asset Management

Management of the Council's property maintenance programme, condition surveys and project management of small to medium size construction projects is carried out by the Property Services team. This team incorporates Facilities Management, with responsibility for the day to day running of the buildings to support and enable ongoing service delivery. The team is augmented by external consultants when specialist advice or additional resources are required.

Compliance with numerous statutory requirements relating to maintenance and management of properties are dealt with in-house, augmented by external consultants when specialist advice is required. The main legislative areas covered are:

- Disability Discrimination Act;
- Control of Asbestos Regulations;
- Health and Safety at Work Act;
- Environment Protection Act (contaminated land);
- Control of Substances Hazardous to Health Regulations (Legionella);
- The Regulatory Reform (Fire Safety) Orders;
- Gas safety and fixed wire testing;
- Fire risk assessments; and
- Lifts and Lifting Operations Lifting Equipment Regulations (LOLER).

Health and Safety schedules have been checked and updated, with all due inspections and certifications in hand.

A rolling five-year programme of condition surveys, regular inspection of the properties and liaison with service managers determines the revenue and capital budgets required over the medium term.

The objective is to reduce reliance on capital to fund planned and reactive maintenance, through continued aggregation of planned maintenance contracts and efficient re tendering of services that the Council purchases from external contractors.

Budgets for, and the cost of, repairs and maintenance are split between planned maintenance and reactive maintenance in order to monitor and measure the progress of improving the proportion of expenditure on the former at the expense of the latter.

All procurements are undertaken in accordance with the Council's Contract Procedure Rules and making use of the Council's E-Procurement system. This approach ensures both compliance with legislation governing public sector procurement and an open and competitive process for securing the most economically advantageous terms.

Implementation of IFRS16: Leases

From 1 April 2024 the accounting standard which sets out guidelines for accounting for leases changes from IAS (International Accounting Standard) 17 to IFRS (International Financial Reporting Standard) 16.

From this date the way the Council accounts for the assets that it leases will change.

The definition of a lease has been adapted for the public sector as being '*a contract, or part of a contract, that conveys the right to use an asset for a period of time.*'

Adoption of IFRS16 will bring additional lease liabilities on to the balance sheet (e.g. right of use, embedded, rolling and peppercorn leases) which will have an impact on the Council's Prudential Indicators, including the Capital Financing Requirement (CFR), Minimum Revenue Provision (MRP), Authorised Borrowing Limit and Operational Boundary for Borrowing.

When a leased asset is recognised in the balance sheet a corresponding liability will then be created, representing the obligation to make lease payments for the life of the contract.

When lease payments are made, rather than being reported as an expense against a service, the cost will be split between paying off the liability and interest payments.

The leased asset will be depreciated in the same way as similar assets of that class, usually over the life of the lease, unless the asset's useful life is shorter.



Signed off by	Head of Planning
Author	Andrew Benson Head of Planning Services Tanya Mankoo-Flatt, Principal Planning Development Officer
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To	Executive Meeting Council Meeting
Date	Thursday, 21 March 2024 Thursday, 28 March 2024
Executive Member	Portfolio Holder for Place, Planning and Regulatory Services

Key Decision Required	Y
Wards Affected	(All Wards);

Subject	Local plan (Core Strategy) Review, and Indicative New Local Plan Timetable and Statement of Community Involvement (SCI) Update.
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Recommendations	
<p>Executive is asked to approve :</p> <ul style="list-style-type: none"> (i) and adopt the updated Reigate & Banstead Statement of Community Involvement (SCI) in Planning (Annex 5); and (ii) a review of the Statement of Community Involvement’s (SCI’s) requirements on publication of names and postal addresses from comments on planning and related applications. <p>Council is asked to approve and adopt:</p> <ul style="list-style-type: none"> (iii) the review of the Reigate & Banstead local plan: Core Strategy policies (Annex 1), which concludes that the Core Strategy policies remain “up to 	

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date” and effective for the purposes of planning decisions, and that it be published; and

- (iv) That, subject to the approval of Recommendation (iii), an indicative timetable for a new local plan (Annex 4) be approved.**

Reasons for Recommendations

The local plan Core Strategy forms part of the Council’s Policy Framework and the Borough’s development plan, and was adopted 3 July 2014. The Council is legally required to review its local plan policies every 5 years from the date of adoption to consider whether they remain up to date and effective for assessing development proposals.

With the first review of the local plan Core Strategy approved and adopted by the Council on 2 July 2019, its policies have been reviewed again to comply with legal requirements and to ensure that it remains effective for determining applications for development (it needs to be updated if the review shows it to be out of date).

Adopting and publishing the review will ensure compliance with statutory requirements and confirms their continued effectiveness for decision making.

The Local Development Scheme (LDS) sets out the Council’s timetable for the scope and preparation stages of its local plan and associated policies map. The current LDS was adopted by the Council on 27 October 2022. In October 2023, government passed a new Act, the Levelling-up and Regeneration Act 2023, which includes a new system for making local plans, with different stages, which the current LDS does not reflect, and which removes the need for a LDS, and replaces this with a local plan “timetable”. The Council therefore needs a new timetable for preparing its next local plan.

The Statement of Community Involvement (SCI) is a statutory document that the Council is required to prepare and maintain, which sets out how it will involve people who may have an interest in the development of the Borough in decisions about its planning and development. The current SCI was adopted April 2019 and must be reviewed at least every 5 years, and updated when needed.

The SCI includes the requirement for names and addresses of those commenting on planning and related applications to be published. This has been a fundamental part of the transparency and accountability of the planning process but is governed by new guidance meaning a fully informed and considered review is recommended.

Executive Summary

As a statutory planning document and part of the Council’s Policy Framework, the local plan Core Strategy is a key strategy for the Borough and is part of the Borough’s development plan. It sets the Vision, development needs and the policy framework for the management and development of the Borough for the period 2012 to 2027. The strategy identifies where, when and how these needs will be provided.

A thorough review of the local plan Core Strategy is set out in Annex 1. The Review demonstrates that the Core Strategy remains up-to-date and effective, is in general

conformity with national policy, and has not become outdated by local evidence or circumstances. It remains effective in delivering its strategy, as demonstrated by Council monitoring and national housing delivery monitoring. As all the Core Strategy policies remain up-to-date and effective, they can continue to be used to assess planning applications and appeals.

Production of a new local plan, which will establish the development needs for the 15 years post-2027, was commenced in early 2023 with a formal launch in February 2023. The Council is currently preparing evidence and collating data which will inform the new local plan. Notwithstanding this new local plan work, there remains a statutory requirement to review our adopted local plan policies every 5 years from adoption, and to publish the review where it determines that policies do not need updating.

Recommendations (i) and (ii) are subject to approval by Executive.

Recommendations (iii) and (iv) are subject to approval by Council

Statutory Powers

1. The Planning and Compulsory Purchase Act 2004, The Planning Act 2008, The Localism Act 2011, the Housing and Planning Act 2016 and the Town and Country (Local Planning) (England) Regulations 2012 (as amended) ('the Local Plan Regulations 2012), provide the current statutory framework for the preparation and review of local plan documents by the Local Planning Authority.
2. National policy in relation to the review of local plan documents is provided by the National Planning Policy Framework (NPPF) December 2023, and the Planning policy for traveller sites 2023 (PPTS 2023), the former supported by National Planning Practice Guidance (PPG).
3. Regulation 10A was introduced into the of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) on 6 April 2018, and requires Councils to complete a review of local plan documents every five years, starting from the date of adoption of the document. If a review shows that any policies are out of date because of changes to national policy or local evidence and circumstances or other factors, the policies should be updated, using the same process as for preparing a new local plan.

Background

4. The statutory requirement to complete a review of local plan documents every 5 years, from the date of their adoption was introduced in 2018 through the 'Local Plan Regulations'. The Reigate and Banstead local plan Core Strategy (CS) sets out the strategic development needs for the Borough over the 15 year period 2012-2027 (often referred to as "the plan period", and where, when and how these development needs will be provided for. It was adopted on 3 July 2014, and its first review, which concluded it remained up to date and effective, was approved and adopted by the Council on 2 July 2019, within 5 years of its adoption. In the period since then, the

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second part of the Borough's local plan, the Development Management Plan (DMP) was adopted on 26 September 2019.

5. Together with Surrey County Council's Minerals and Waste local plans, the CS and DMP constitute the Borough's statutory development plan for the purposes of section 38 "development plan" of the Planning and Compulsory Purchase Act 2004 (as amended).
6. The Core Strategy was prepared in accordance with relevant legislation (as confirmed in the Core Strategy Inspector's report) and was therefore found to be legally compliant. The Core Strategy was also deemed "sound" subject to making a number of main modifications, when assessed against national policy that was in force at the time of the examination (the National Planning Policy Framework 2012). The Core Strategy was amended to reflect the Main Modifications and subject to consultation and regulatory appraisals before it was adopted.
7. Alongside the additional requirement added to the Local Plan Regulations, the NPPF was updated in 2018 to reflect the requirement for local planning authorities to complete a review of each local plan every 5 years of its adoption. NPPF paragraph 33 requires policies in local plans to "*be reviewed to assess whether they need updating at least once every five years,*" from the date of their adoption, "*and should then be updated as necessary*". There is a clear distinction in law and policy between the requirement for a review of local plan policies, which is an assessment of whether a policy remains up to date and effective, and a subsequent update of local plan policies, if judged to be required. Whether, having reviewed local plan policies and update of policies is required, is a matter of judgement for the Council to make.
8. The local plan review process ensures that a local plan and its policies remain effective. Review of local plan policies at least every 5 years is crucial in ensuring that development plan policies are up to date for determination of applications. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Due weight should be given to relevant policies in existing plans according to their consistency with the National Planning Policy Framework. It will be up to the decision-maker to decide the weight to give to the policies.
9. National planning policy (NPPF paragraph 31) requires the review of all policies to be underpinned by relevant and up to date evidence, which should be adequate and proportionate, and take into account relevant market signals.
10. The PPG advises (Paragraph Reference 61-065-20190723; Revision date: 23 07 2019) that when determining whether a plan or policies within a plan should be updated, a local authority "can consider information such as (but not exclusively):
 - conformity with national planning policy (note the NPPF uses the synonym "consistent")
 - changes to local circumstances; such as a change in Local Housing Need;

- their Housing Delivery Test performance;
- whether the authority can demonstrate a 5 year supply of deliverable sites for housing;
- whether issues have arisen that may impact on the deliverability of key site allocations;
- their appeals performance;
- success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report;
- the impact of changes to higher tier plans;
- plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need;
- significant economic changes that may impact on viability; and
- whether any new social, environmental or economic priorities may have arisen”

In reviewing local plans, a Council can consider the above information, but is not required to, and may it also consider other information not included in the list, including, as the PPG advises, any relevant up to date evidence.

Key Information

11. *‘Reigate & Banstead 2025’* is the Council’s five-year plan (for 2020 to 2025) which sets out its priorities for the next five years, including its plans to tackle climate change and how it will support the Borough’s towns and villages, and local businesses. To support its delivery, the Council has adopted several strategies; its *‘Housing Delivery Strategy 2020-2025’*, *‘Environmental Sustainability Strategy’*, *‘Economic Development Framework’*, and *‘Commercial Strategy’*. Alongside the Core Strategy and Development Management Plan, these Council strategies help the Council to achieve the desired changes in the Borough set out in the Council’s 5-year plan. The Council has started work on a new Council plan for the period 2026-2031. Progress on delivery against all of these Council strategies is reported on our website annually.

Review of the local plan Core Strategy

12. As legally required, the Council must review its local plan Core Strategy every 5 years starting from the date of its adoption. With the first review of the local plan Core Strategy approved and adopted by the Council on 2 July 2019, its policies have been assessed again to comply with legal requirements and to ensure that it remains up to date and effective for determining applications and appeals for development.
13. It is important to note that there is a clear distinction between a review of a local plan, and a subsequent revision or update to a local plan. The Local Plan Regulations require a review but whether, having conducted the review, an update is required, is a matter of judgment for the Council. The NPPF 2023 (paragraph 32) makes this distinction clear by confirming that policies in local plans “*should be reviewed to*

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assess whether they need updating at least once every five years, and then should be updated as necessary", confirming that a review may be a precursor to preparation or a new or updated plan if the review assessment show the policies to be out of date and therefore no longer effective.

14. The Planning Advisory Service (PAS) has produced detailed advice to assist Councils reviewing, updating, or preparing local plans, in the form of a '*Local Plan Route Mapper*' along with a four-part *Toolkit* (October 2021). In carrying out this review of the Core Strategy, officers have considered the advice in the PAS '*Route Mapper*', in particular the section '*Reviewing the need to update your local plan policies*' at pages 14 to 20. Part 1 '*Local Plan Review Assessment*' of the PAS Toolkit is a matrix consisting of set of questions to help local planning authorities in reviewing their local plan policies to decide whether they remain up to date and effective for decision making, or whether they will need updating. The aim of the PAS Route Mapper Part 1 toolkit is to enable councils to demonstrate that a local plan review has been undertaken in a robust and objective way. In reviewing each policy and completing the local plan review document (Annex 1), Council officers have completed PAS Toolkit Part 1 "Local Plan Review" which is provided at Annex 3. The other parts of the PAS Toolkit relate to updating or preparing a new local plan.
15. Whilst there is no prescribed format for a local plan review, the PPG (Paragraph Reference: 61-070-20190315) advises that "*if a local planning authority decides that they do not need to update their policies, they must publish the reasons for this decision within 5 years of the adoption date of the plan. A local planning authority will not necessarily need to revise their entire plan in whole and may publish a list of which policies they will update and which policies they consider do not need updating.*" This amplifies the requirements at section 17(6B) (b) of the 2004 Planning and Compulsory Purchase Act (as amended).
16. As part of the review process and in accordance with national planning guidance (Reference ID: 61-075-20190723), Council officers have engaged with our Duty to Co-operate partners regarding the draft local plan review. Duty to Cooperate bodies include a specific prescribed set of other public bodies as set out in Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council also went beyond the list of prescribed bodies to invite comments from the Council's "specific consultation bodies", which includes County Councils, adjoining and other nearby Local Planning Authorities and Parish Councils, and infrastructure providers to let us know of any comments they might have on our draft local plan review. All of these were invited to contribute to the review of the Core Strategy with their comments. A formal consultation of all specific and general consultation bodies and prescribed bodies is not required for local plan reviews and would be disproportionate.
17. A summary of the comments received on the draft Core Strategy Review from the ten organisations that responded, and officer responses is provided at Annex 2. These comments have been taken into account in finalising the Review.

18. In producing a new local plan, for which early evidence work has been commenced, the Council will engage with local communities and with organisations with interest in the Borough's development and / or preservation, as summarised in the SCI.
19. Should Recommendation iii of this report be agreed, the adoption and publishing of the local plan review will ensure compliance with statutory requirements and confirm their continued effectiveness for decision making.

New local plan timetable

20. A requirement of the current system of making local plans is to prepare a local plan in accordance with the scope and timetable set out in a Local Development Scheme (LDS). The current LDS was adopted by the Council 27 October 2022, and sets out the Council's timetable for preparation of a single new local plan and associated Policies Map. However, the Levelling-up and Regeneration Act 2023 includes provisions for introducing a new system of making local plans, which the current LDS does not reflect.
21. The new system of local plan making has not yet come into force, but the LUR Act specifies that it will on a day that the Secretary of State may appoint by regulation, which is currently unknown, but which Government have indicated may be around Autumn 2024..
22. It is the government's stated intention that new local plans currently being prepared will need to be submitted for independent examination by 30 June 2025 (or proactively working towards that date) and adopted by the end of 2026 to be prepared under the current plan making system (government consultations "*Levelling-up and Regeneration Bill: reforms to national planning policy*" December 2022 to March 2023 and reiterated in its "*Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms*" July to October 2023). Local plans which will be submitted after 30 June 2025 will need to be prepared under the newly emerging plan system. As is demonstrated through the Council's current 2022 LDS, it is not possible for the Council to prepare a robust effective new local plan to submit in that timescale.
23. Therefore a new "local plan timetable" has been prepared, based on the requirements of section 15B of the LUR Act 2023 and other information from government's consultation material about the new local plan making system.
24. The indicative "local plan timetable" is presented at Annex 4, and it is recommended that this be adopted and subsequently published online should Recommendation iii be agreed. As required, it would take effect from the date of its publication, and will be maintained and updated through the stages in preparation of the new local plan.

Revision of the Statement of Community Involvement

25. The Planning and Compulsory Purchase Act 2004 requires each local authority to prepare and maintain a Statement of Community Involvement (SCI) that sets out how

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and when the Council will engage with the community and other stakeholders regarding planning matters.

26. Councils are legally required to review their SCI at least every five years. The Statement of Community Involvement (SCI) does not necessarily need to be updated if a review shows it to be up to date. The current SCI was adopted and published in April 2019. Whilst there have been no changes to legal requirements nor to guidance about SCIs, our review assessment of the current SCI indicated that it would benefit from minor updates. These amendments to the SCI are to make it more accessible, to reflect new technology, and to improve the document for readers with visual impairments.
27. The SCI includes the Council's practice of publishing the names and addresses of those commenting on planning and related applications. This has been a long-standing requirement and is the norm amongst local planning authorities nationwide. However, it has recently been clarified by the Information Commissioner's Office (ICO) that local planning authorities have discretion about whether to publish such information and it is therefore prudent to undertake a review of the practice, fully informed by relevant guidance and an understanding of the arguments for and against making such a change.

Options

28. Executive has the following Options:

Recommendation (i)

Option 1: To approve and publish the revised Statement of Community Involvement (SCI) in Planning, to advise communities and interested groups and individuals how they can be involved in planning the future development and preservation of the Borough.

This is the recommended Option.

Option 2: To not approve and publish the revised Statement of Community Involvement (SCI) in Planning. This option would mean that people, communities and local groups may not always be aware of the various ways to be involved in the Borough's planning, including through using the latest digital technology.

This option is not recommended.

Recommendation (ii)

Option 1: That the Executive agrees to review the section in the Statement of Community Involvement (SCI) on publication of names and postal addresses from comments on planning and related applications.

This would allow an informed and considered approach to the practice to take account of latest guidance and arguments for and against.

This is the recommended Option.

Option 2: To not review the section in the Statement of Community Involvement (SCI) on publication of names and postal addresses from comments on planning and related applications.

This would not allow for a review of the matter taking account of the latest guidance.

This option is not recommended

29. Council has the following Options:

Recommendation (iii)

Option 1: To approve, adopt and publish the review of the Reigate & Banstead Local Plan: Core Strategy.

The Council is required to complete a review of the local plan Core Strategy by 2nd July in order to comply with legislative requirements.

A comprehensive review of all local plan Core Strategy policies has been conducted, taking account of relevant legislation, policy and guidance. It has considered many factors, as advised by the Planning Practice Guidance, including conformity with current national policy, local circumstances (including any changes in circumstances), and relevant evidence and monitoring data as to the current local situation and performance of the plan.

The review has concluded that none of the policies presently require updating or modification. Adopting and publishing the review will provide certainty and clarity to all stakeholders in respect of the status of the Core Strategy.

This is the recommended Option.

Option 2: To not approve, adopt and publish the review of the Reigate & Banstead Local Plan: Core Strategy.

The Council is required to complete a review of the local plan Core Strategy by 2nd July in order to comply with legislative requirements. Failing to adopt the review would mean that the Council does not comply with its statutory obligations, and may well have adverse consequences for how much weight / consideration the Core Strategy policies are given in the determination of planning applications and planning appeals, particularly given national policy regarding calculating housing land supply, and could give rise to considerable uncertainty for all parties.

This option is not recommended.

Option 3: Adopt a review with different conclusions to those set out.

Council could chose to adopt a review that concludes that one or more of the policies in the Core Strategy does require updating or modification. However, as above, a comprehensive review has been conducted; taking account of relevant legislation, policy and guidance and this has concluded that none of the policies presently requires updating or modification. Clear evidence or explanation would be needed

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to support alternative conclusions. A conclusion that policies do need updating would have implications for the weight which might be afforded to those policies in the determination of planning applications until such time as the Council had completed the full (or partial) updating of those policies through the normal plan-making process.

This option is not recommended.

Recommendation (iv)

Option 1: To approve and publish the new indicative timetable for preparation of a new local plan.

This recommended option would confirm the Council's intended progress towards preparing and adopting a single new local plan, which will include strategic, local, and design code policies and site allocations for the Borough as well as a Policies Map under the new system for preparing local plans.

Despite the current considerable legislative and policy uncertainty relating to local plan preparation, it is helpful to the Council and to interested parties to have an indication of dates being worked to.

This is the recommended Option.

Option 2: To not approve the new timetable for preparing a local plan under the new system

The current published timetable, the Council's Local Development Scheme (LDS) has submission of the local plan in August 2026 and adoption in July 2027, which would not be possible under the government's stated intended "cut off dates" for plans to be examined and adopted under the current plan-making system. The Council would need to take a report with new timetable for agreement at a future date.

This option is not recommended.

Legal Implications

30. The review of the local plan Core Strategy has been carried out in accordance with the relevant legislative requirements, policy and guidance.
31. The risk of legal challenge in relation to the review is considered below, under the Risk Management Section of this report.

Financial Implications

32. The local plan Core Strategy review has been undertaken within the approved revenue budget of the Planning Policy Team.
33. The approval, adoption and publication of the local plan review will not result in any additional financial implications.

Equalities Implications

34. As a public authority, in exercising its public functions, service provision and internal operations, the Council is required (under the Equality Act 2010) to consider the need to eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity between people who share a 'protected characteristic' and people who do not; and foster good relations between people who share a 'protected characteristic' and people who do not. The term 'protected characteristic' refers to age, disability, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief, sex, sexual orientation, and gender reassignment. If we fail to consider how a policy or proposal might affect different groups in different ways, the policy is unlikely to have the intended effect, and could contribute to greater inequality and poor outcomes for some.
35. In preparing its Core Strategy, as a new policy, the Council carried out an Equalities Impact Assessment in 2009 to identify any potential equalities issues that might arise, and to enable them to be addressed through preparation of the policies. The equalities assessment concluded that the Core Strategy would have a positive impact on a number of groups with protected characteristics, and a neutral impact on others.
36. The local plan Core Strategy review considers whether the Council's existing policies remain up to date, and that review concluded that the policies do not currently need updating. However as the baseline equalities data has changed since the Core Strategy was examined, the adopted Core Strategy policies have been subject to Equality Impact Assessment again, which also concluded that the Core Strategy would have a positive impact on a number of groups with protected characteristics, and a neutral impact on others.
37. The Statement of Community Involvement in Planning has been updated to reflect changes in document accessibility for people with limited vision, technological and social media changes and greater use of visual on-line methods for engaging people who we rarely hear from.

Communication Implications

38. Should the Council approve and adopt the local plan Core Strategy review, it will be published on the Council's website, which will meet the PPG requirements summarised in paragraph 10 above. The conclusions of the local plan review will be of interest to local communities and stakeholders. Any enquiries will be dealt with by the Planning Policy team with support from the Communications team as appropriate.
39. The revised Reigate & Banstead Statement of Community Involvement (SCI) in Planning, and the indicative timetable for producing a new local plan will also be published on the Council's website, and will be made available by the Planning Policy Team in other formats, such as large print or other languages if required.

Environmental Sustainability Implications

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40. As the first, strategic part of the Borough's Local Plan, the Core Strategy sets the high level policy and strategy, including Policies CS10 'Sustainable Development' and CS11 'Sustainable Construction', both of which have been found to remain up to date and effective in the local plan Core Strategy Review (Annex 1). These policies have subsequently been supplemented by the Council's adoption of detailed DMP policies and SPD guidance in relation to Climate Change and Sustainable Construction.
41. Given the issues it covers, the Council's Statement of Community Involvement (SCI) in Planning does not have implications for environmental sustainability.

Risk Management Considerations

42. Relevant national legislation, policy and guidance have all been considered. We have invited comments on the draft local plan Review from stakeholders categorised as 'prescribed bodies' under the Duty to Co-operate, and from specific consultees. In following the legal and guidance requirements we are minimising the risk of legal challenge to the Review.

Consultation

43. National planning guidance (PPG Reference ID: 61-068-20190723) is clear that local authorities are expected to have due regard to the Duty to Cooperate when reviewing local plans to assess if they need updating. Accordingly we sought the views of, and invited comments on the draft LP CS Review from stakeholders categorised as 'prescribed bodies' under the Duty to co-operate, and also additionally from specific consultees. There is not requirement to undertake a full public consultation on a local plan review. The comments received (see Annex 2 for comments and officer responses) were taken into account in finalising the local plan Core Strategy Review.
44. The draft local plan Core Strategy Review was also presented at meetings of the Council's Leaders and Local Plan Advisory Group (LPAG), and to the Council's Executive for comments.
45. Should the Council agree to Recommendation iii, to adopt the LP CS Review, it will be published on the Council's website as required.

Policy Framework

46. The Council's Policy Framework includes this Local Plan Core Strategy as a development plan document prepared in accordance with the Planning and Compulsory Purchase Act 2004 (or as subsequently amended). The full Council can approve or adopt the policy framework, which includes the Core Strategy.

Background Powers

1. Review of the Reigate & Banstead local plan: Core Strategy – Report to Council, 2 July 2019 and Minute [Agenda for Council on Tuesday, 2nd July, 2019, 8.30 pm | Reigate and Banstead Borough Council \(moderngov.co.uk\)](#)

2. National Planning Policy Framework December 2023
3. Planning Practice Guidance (PPG)
4. Planning Advisory Service (PAS) 'Local Plan Route Mapper' Oct 2021; particularly Section A (pages 14-20)
5. Housing Monitors 2019, 2020, 2021, 2022, 2023
6. Local Development Scheme (LDS), Oct 2022
7. Statement of Community Involvement (SCI), April 2019

Annexes

Annex 1: Local Plan Core Strategy Review, March 2024

Annex 2: Duty to Co-operate Responses to the draft Local Plan Core Strategy Review 2024

Annex 3: Completed Planning Advisory Service (PAS) Local Plan Route Mapper 'Toolkit Part 1: Local Plan Review', March 2024

Annex 4: Indicative new Local Plan timetable, March 2024

Annex 5: Statement of Community Involvement (SCI) in Planning, March 2024

Annex 6 Equalities Impact Assessment of local plan review, March 2024

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Review of Reigate & Banstead Local Plan: Core Strategy

Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

March 2024

Review of the Reigate & Banstead Local Plan: Core Strategy

1. Introduction

- 1.1 The Reigate & Banstead Local Plan: Core Strategy (“the Core Strategy”) was adopted by Full Council on 3rd July 2014. The Core Strategy forms part of the Borough’s statutory development plan for the purposes of section 38 of the Planning and Compulsory Purchase Act 2004 (as amended).
- 1.2 The Core Strategy quantifies the overall needs for development in the Borough for the period from 2012 to 2027 (referred to as the “plan period”), and sets out the spatial strategy to deliver those needs. The plan sets out the amount, type and location of the development, including the Borough’s local plan housing requirement for the plan period.
- 1.3 The Core Strategy, as the strategic, part 1 of the Borough’s Local Plan, was prepared in accordance with relevant legislation in place at the time (as confirmed in the Core Strategy Inspector’s Report as being legally compliant). As well as being found legally compliant, the Inspector also found the Core Strategy to be “sound” subject to a number of main modifications, which the Council made before its adoption. The “soundness” test includes finding it to be “*consistent with national policy*” at the time of the local plan examination (which was the 2012 National Planning Policy Framework, under which the CS was examined).
- 1.4 The Council reviewed its Core Strategy in 2019, less than 5 years after it was adopted, and concluded that none of its policies needed to be updated at the time, but that several issues needed to be closely monitored and could trigger the need for a further review. The Core Strategy review was approved and adopted by the Full Council on 2nd July 2019, within five years of its adoption. The Core Strategy therefore continues to be part of the statutory development plan for the Borough (for the purposes of section 38 of the Planning and Compulsory Purchase Act 2004 (as amended)), along with the local plan “part 2”, the Development Management Plan, adopted by Full Council on 26th September 2019.
- 1.5 The Development Management Plan (DMP) provides more detailed policies which are used for determining applications, and allocates sites to help to deliver some of the higher level policy aims of the Core Strategy. The DMP also includes an Affordable Housing policy, and updated retail requirements, which supersede those in the Core Strategy.
- 1.6 The Core Strategy contains (see Core Strategy paragraph 1.6):
 - a) A spatial vision setting out what we want the Borough to look like in the future
 - b) A set of strategic objectives, outlining the issues that need to be addressed in order to realise our spatial vision
 - c) A series of strategic policies that will deliver our vision and objectives.

These policies are specific to Reigate & Banstead, but also recognise the difference that exist within the Borough.

The policies provide a framework to inform and co-ordinate future development and investment in the Borough, and to guide decision-making on development proposals.
- 1.7 The Core Strategy policies are divided into three types:

spatial strategy policies (Policies CS1- CS5),

place-shaping policies (Policies CS6 to CS9), and
cross-cutting policies (Policies CS10 to CS18).

- 1.8 The Core Strategy plan period covers 2012-2027, and includes a specific commitment (at paragraph 8.17) to commence a review within 5 years of its adoption date (3 July 2014). The CS Review was approved and adopted by the Council on 2 July 2019. This second review is as required by national legislation (see below), to ensure that its policies remain up to date, robust, and effective for the purposes of decision making.

Legislation, policy and guidance regarding local plan reviews

- 1.9 The preparation and revision of local plans is governed by the Planning Acts, notably the Planning and Compulsory Purchase Act 2004 (as amended), and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The key national planning policy for making and reviewing local plans is provided in the [National Planning Policy Framework](#) (NPPF) Dec 2023, and guidance in the [on-line live national Planning Practice Guidance](#) (PPG) - in particular its guidance on Plan-making / Plan reviews.
- 1.10 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) “the Local Plan Regulations” was updated on 6 April 2018 to include the statutory requirement that local planning authorities must complete a review of local development documents **every five years starting from** the date of **adoption**. The first review was undertaken and adopted by the Council on 2 July 2019. The Council is therefore legally required to complete another review of its local plan Core Strategy policies before 2nd July 2024.
- 1.11 The requirement to review local plans at least every five years is stated explicitly in national planning policy in the National Planning Policy Framework December 2023 (“NPPF 2023”) paragraphs 31 to 33. Paragraph 33 requires policies in local plans to “*be reviewed to assess whether they need updating at least once every five years,*” from the date of their adoption, “*and should then be updated as necessary*”. There is a clear distinction in law and policy between the review of local plan policies, which is an assessment, and their update; with updates only being required where necessary. Statute and policy require a review of the plan policies, but having reviewed each policy, whether updates are required is a matter of judgement for the Council. The 2024 review will inform the Council’s decision whether to update any of its Core Strategy policies.
- 1.12 National policy requires that “*strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities*” (NPPF Dec 2023 paragraph 22), and local planning authorities are therefore required to plan for the full plan period. National planning guidance (in the online PPG) advises that “*Policies age at different rates according to local circumstances, and a plan “does not become out-of-date automatically after 5 years*”. (PPG Paragraph Reference : 61-064-20190315 Revision date: 15 03 2019).
- 1.13 It is clear from this policy and guidance that the purpose of the reviews is not to frequently change the strategic decisions and direction of growth in the Borough, which would undermine the clear national policy intention for strategic policies to “*anticipate and respond to long-term requirements and opportunities*”. This reflects the Government’s commitment to a plan-led approach and is integral to providing certainty to all stakeholders

as to how an area will grow and evolve, including developers and infrastructure providers who may be making long-term investment decisions.

- 1.14 In respect of strategic housing requirement policies, the NPPF (paragraph 33) states that *“relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly”*. The PPG amplifies this with the guidance that *“Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method...”* (PPG Paragraph Reference 61-062-20190315; Revision date: 15 03 2019). As “significant” in this context has not been defined, it is for each local authority to decide whether its local housing need has changed significantly.
- 1.15 National planning policy (NPPF paragraph 31) requires the review of all policies to be underpinned by relevant and up to date evidence, which should be adequate and proportionate, and take into account relevant market signals.
- 1.16 The PPG advises (Paragraph Reference 61-065-20190723; Revision date: 23 07 2019) that when determining whether a plan or policies within a plan should be updated, a local authority *“can consider information such as (but not exclusively):*
- *conformity with national planning policy (note the NPPF uses the synonym “consistent”)*
 - *changes to local circumstances; such as a change in Local Housing Need;*
 - *their Housing Delivery Test performance;*
 - *whether the authority can demonstrate a 5 year supply of deliverable sites for housing;*
 - *whether issues have arisen that may impact on the deliverability of key site allocations;*
 - *their appeals performance;*
 - *success of policies against indicators in the Development Plan as set out in their Authority Monitoring Report;*
 - *the impact of changes to higher tier plans;*
 - *plan-making activity by other authorities, such as whether they have identified that they are unable to meet all their housing need;*
 - *significant economic changes that may impact on viability; and*
 - *whether any new social, environmental or economic priorities may have arisen”*

In reviewing local plans, a Council **can** consider the above information, but is not required to, and may also consider other information not included in the list, including new evidence.

- 1.17 The legal and policy requirements and guidance listed above has been taken into account in preparing this Core Strategy review. Additionally, Written Ministerial Statements (WMSs) which the government uses to publicly record their discussions and announcements, announcing policy or legislation changes affecting the planning system, can impact upon the preparation of development plans, as advised in NPPF Dec 2023 paragraph 6 *“Other*

statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements”.

- 1.18 One such WMS provided by the Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations (The Rt Hon. Michael Gove MP) on 6 December 2022 was “Update on the Levelling Up Bill”. That WMS included the statement that “***It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character or an area, or heritage assets.***”
- 1.19 This WMS of 6 Dec 2022 is particularly relevant here. It clarifies that it is a local authority’s choice to alter Green Belt boundaries for housing development to meet identified local housing needs, against the current requirement often cited by local plan inspectors to accommodate the area’s full local housing needs if they cannot be sustainably planned for elsewhere in the area.
- 1.20 The NPPF December 2023, as in the September 2023 NPPF, does not actually require alteration of Green Belt boundaries to meet housing needs, but rather it provides the opportunity to do so through demonstration of Exceptional Circumstances should the relative sustainability of this spatial option be demonstrated through the preparation of a plan. The approach therefore remains the same, that Green Belt boundaries should only be changed through local plan where exceptional circumstances are fully evidenced and justified through the plan making process. The approach for concluding that “exceptional circumstances” exist to justify changes to Green Belt boundaries, remains unchanged (NPPF December 2023; paragraph 146).
- 1.21 Although the amendments to national policy in the NPPF in this respect do not actually change the national policy position, by the clarification they provide, they should ensure that the national policy position is fully reflected in the examination of local plans which include a strategic policy setting a local plan housing requirement at a sustainable level, directed towards meeting identified local housing need for authorities with considerable constraints, including a high proportion of Green Belt, such as Reigate & Banstead Borough Council.
- 1.22 As noted at paragraph 2.3 above, the Core Strategy was examined against the March 2012 National Planning Policy Framework (NPPF). Since then, the Government has published several revisions and updates to the NPPF, in July 2018 and February 2019 (before the 2019 local plan Core Strategy review), and three times since, in July 2021, with minor changes in September 2023, and a further update in December 2023).
- 1.23 In summary, the key changes to the NPPF since 2012, of particular relevance for local plan making and review, are:
- Introduction of a standard methodology for calculating local housing need as an “advisory starting point for establishing a housing requirement for the area”, replacing the old approach of “objectively assessed needs”.
 - Expectation for at least 10% of housing to be accommodated on small/medium sized sites (up to 1 hectare).
 - Expectation for at least 10% of housing on major developments to be available for affordable home ownership, except in the specified circumstances.

- Changes to the calculation of five year supply for strategic policies over five years old and to reflect the introduction of the Housing Delivery Test.
- Continued strong protection of the Green Belt, including need to demonstrate that all other reasonable options for meeting identified development needs have been fully considered before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. When reviewing Green Belt boundaries, consideration is now also required to be given to prioritising previously developed land, and / or land that is well served by public transport. Local planning authorities are also now required to establish ways in which compensatory improvements to the environmental quality and accessibility of remaining Green Belt land can offset de-designation of other Green Belt land.
- Changes to protections on habitats and biodiversity, including strengthening of protections of irreplaceable habitats (including ancient woodland) and clarity over the approach to developments which may impact upon sites protected under the Conservation of Habitats and Species Regulations 2017.
- Greater focus on optimising use of land, particularly of previously developed land, and for making efficient use of land by maximising densities, and applying minimum density standards where appropriate in town centres and other locations well served by public transport.
- Support for mitigation and adaptation to climate change (including by effectively using land in urban areas), including by encouraging more tree planting. It includes a requirement for local plan policies and decisions to ensure new streets are tree-lined, and other trees are incorporated elsewhere within developments, including measures taken to maintain new trees, and also retention of existing trees.
- Flooding and coastal change.
- Strengthened focus on design quality to achieve well-designed and “beautiful places”, including preparation (with community engagement) of design codes and guides consistent with the principles set out in the National Design Guide and Model Design Code and reflecting local character and design preferences. Use of these in assessing design of street, parking spaces and other transport elements, to refer to national guide and code in absence of locally adopted ones.
- Including a local plan vision that extends at least 30 years ahead, to take account of likely delivery timescale where new settlements or significant extensions to existing settlements are planned, whilst retaining requirement for strategic policies to plan for a minimum of 15 years from their adoption.
- Greater encouragement for diversification of town centres to respond to changes in the retail and leisure industry.
- Requirement for plans to be accessible through use of digital tools to assist public involvement and policy presentation.
- Giving greater weight to new and improved renewable energy sites, including for onshore wind generation infrastructure projects.
- For clarification, the policy test of “soundness” which local plans are examined against “consistent with national policy” now explicitly also includes “other statements of

national planning policy, where relevant”, in addition to the NPPF.

- Limiting the situations where local planning authorities can use Article 4 directions removing permitted development rights, in particular for pd rights relating to change from non-residential to residential use (in order to maximise the number of additional homes from such changes of use).
- The government has changed its definition of “travellers” for planning purposes twice since the “Planning Policy for Traveller Sites” (PPTS) was first published in 2012. In the PPTS 2015, the definition was amended to exclude travellers who have permanently ceased travelling. However, as summarised in the assessment of Policy CS16 below, this definition was found to be unlawful by the Court of Appeal in 2022 in the case of *Smith v SSLUHC & Ors*. In the PPTS Dec 2023, the government therefore reverted back to the definition of Gypsies and Travellers used in the “Planning Policy for Travellers Sites” to that adopted in 2012, which includes travellers who have permanently ceased travelling.

- 1.24 Since the Core Strategy was adopted, wider planning reforms have continued, particularly in relation to changes to the Use Classes Order 1987 (as amended) such as the introduction of the Use Class E (Commercial, Business and Service) in September 2020. These amend which changes in use are classed as “development” and therefore require planning permission. Also, significantly, permitted development rights to support housing delivery, and to increase diversification and vitality of town centres and other retail areas has been expanded and de-regulated, including from 2021, the permitted development (via prior approval) of Class E to Class C3.
- 1.25 The remainder of this document sets out the Regulation 10A review of the Reigate & Banstead Local Plan Core Strategy. It addresses the requirements of the NPPF 2023, accompanying Planning Practice Guidance and PAS toolkit in assessing each Core Strategy policy in turn).
- 1.26 Whilst there is no prescribed format for a local plan review, the PPG (Paragraph Reference: 61-070-20190315) advises that *“if a local planning authority decides that they do not need to update their policies, they must publish the reasons for this decision within 5 years of the adoption date of the plan. A local planning authority will not necessarily need to revise their entire plan in whole and may publish a list of which policies they will update and which policies they consider do not need updating.”* This amplifies the requirements at section 17(6B) (b) of the 2004 Planning and Compulsory Purchase Act (as amended).
- 1.27 The PPG also advises that *“Proportionate, relevant and up-to-date evidence should be used to justify a decision not to update policies. We expect authorities to have due regard to the Duty to Cooperate when undertaking a review to assess if they need updating.”* (PPG Paragraph Reference : 61-068-20190315).
- 1.28 The Duty to Cooperate is not a legal requirement for local plan reviews. However, given the guidance to have “due regard to the Duty to Co-operate” when reviewing policies that was added to national planning policy guidance on 23 July 2019, the Council invited comments and observations on the draft local plan review from statutory bodies for the Duty to Co-operate and from neighbouring local authorities who are ‘Specific Consultation Bodies’ under the Local Planning Regulations. The comments received from that consultation are summarised in a separate document alongside this, and have been taken into consideration in the review of policies below. Where these raise issues relevant to

producing new policies and / or to the next plan period, they will be addressed through the preparation of the next local plan, which was started in early 2023.

Review of Core Strategy Policies

Policy CS1: Presumption in Favour of Sustainable Development

- 2.1 Policy CS1 is based on the national model policy, which at the time of the Core Strategy (“CS”) examination, was required to be included in all strategic local plans. The policy was added to the CS by the Inspector as a Main Modification (in the Inspector’s Report on its examination). CS1 sets out the application of the national policy presumption in favour of sustainable development, based on the national ‘model’ policy in place at the time.
- 2.2 The supporting text to Policy CS1 summarises the Council’s Spatial Strategy for accommodating its identified needs using an area-based approach.

Conformity with national policy and guidance

- 2.3 Policy CS1 reflects a specific requirement within the NPPF for planning to contribute to the achievement of sustainable development.
- 2.4 It also supports the requirement of NPPF paragraph 8 setting out the overarching requirement for planning policies to help to improve economic, social, and environmental conditions (the third of these is addressed further in CS Policy CS2, and it sets out the “presumption in favour of sustainable development”, a requirement set out in NPPF paragraphs 10 and 11.

Monitoring, local circumstances, and evidence

- 2.5 This policy is included to provide an overview of the Council’s approach and to draw attention to the presumption in favour of sustainable development, now at NPPF Dec 2023 paragraphs 10 and 11. Policy CS1 is therefore not dependent upon evidence base or local circumstances.

Policy CS1: Conclusion

- 2.6 No modification or update to Policy CS1 is required.

Policy CS2: Valued landscapes and the natural environment

- 2.7 The policy sets out the Council’s overarching approach to the protection and enhancement of its green fabric, including landscapes, ecology and green spaces.
- 2.8 It describes the Council’s strategic approach to and requirements for significant development proposals within the Surrey Hills Area of Outstanding Natural Beauty (AONB), which, since 22 November 2023, has been known as Surrey Hills National Landscape, and Area of Great Landscape Value (AGLV), the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC), and other designated areas for nature conservation, and also expected enhancement for other areas of green infrastructure in the Borough. It also identifies that the Council will work with partners to promote green infrastructure.

Conformity with national policy and guidance

- 2.9 Core Strategy Policy CS2 (c) and (e) address the requirements of NPPF 2023 (paragraphs 8 c) regarding one of the planning system's sustainable development objectives, to protect and enhance the natural environment, including to benefit biodiversity.
- 2.10 NPPF Dec 2023 paragraph 20(d) requires strategic policies to conserve and enhance natural environment. Paragraph 96(c) requires planning policies to aim to achieve healthy places which enable and support healthy lifestyles, including through provision of safe and accessible green infrastructure, which is provided for in Policy CS2.
- 2.11 Policy CS2(f) regarding retention and enhancement of a coherent green infrastructure network is consistent with the general requirements of NPPF paragraphs 97a) and 02 regarding planning policies for provision and use of a network of high quality open space.
- 2.12 Policy CS2 (f) also addresses aspects of national design policy in relation to green space provided in NPPF 2023 paragraph 135e).
- 2.13 Policy CS2 is consistent with national policy set out at NPPF paragraphs 180 to 183, which addresses the conservation and enhancement of the natural environment and hierarchy of designated sites for nature and landscapes designations.
- 2.14 NPPF 2023 paragraph 185(b) specifies the requirement for plans to "*identify and pursue opportunities for securing measurable net gains for biodiversity*", as did the 2019 NPPF. This requirement has been strengthened since the 2012 NPPF (paragraph 109) under which the Core Strategy was examined, which included a policy of "*providing net gains in biodiversity where possible*".
- 2.15 The new policy requirement for measurable biodiversity improvement on development sites, is included in the Environment Act 2021, which includes a requirement for a minimum of 10 per cent 'biodiversity gain'. This legal requirement applies to most 'major' developments from 12 February 2024, and is due to come into force for other smaller developments from 2 April 2024.
- 2.16 This legal requirement will be implemented locally as required by the new legislation, policy and guidance in the PPG as a development management issue. It is not for strategic planning policies to set out the working details of how this measurable net gain requirement would operate.
- 2.17 Local Plan CS2 identifies and protects the hierarchy of designated habitat sites in the Borough, as required by the NPPF paragraphs 85 and 187. It protects the European-level protected Mole Gap to Reigate Escarpment Special Area of Conservation (SAC), from development likely to have (alone or in combination) a significant adverse effect on the integrity of the site.
- 2.18 Policy CS2 also protects the nationally important Sites of Special Scientific Interest (SSSIs), the locally designated Sites of Nature Conservation importance (SNICs) and Local Nature Reserves (LNRs) for their biodiversity value. It also includes a commitment to promote, enhance, and manage a network of multi-functional green infrastructure.
- 2.19 The Policy also requires natural spaces such as those listed above, green corridors and important site-specific features to be retained and enhanced as far as practicable.
- 2.20 Policy CS2 is compliant with NPPF paragraph 18, and with regards to the natural

environment and biodiversity requirements, which are addressed suitably by CS2 at the strategic policy level.

- 2.21 Additional national policy requirements such as requirements for trees on new streets and in developments (NPPF paragraph 136) are relevant to detailed development management and site allocation policies rather than to strategic policies.
- 2.22 The Surrey Hills Area of Outstanding Natural Beauty (AONB), known since 22 November 2023 as 'Surrey Hills National Landscape', covers a belt of land running east-west across the centre of Borough, just to the north of Reigate, Redhill and Merstham. Designated in 1958 for its outstanding nationally important landscape beauty, the high level of protection from development given by national planning policy is reflected in Policy CS2. Policy CS2 also provides the buffer land around the AONB, known as Area of Great Landscape Value (AGLV), with the same level of protection, including to protect views into the AONB, until there has been a review of the AONB boundary.
- 2.23 The long-anticipated boundary review is being undertaken by Natural England. The boundary review is at an advanced stage. Statutory and public consultation on the proposed extension areas to the nationally important landscape was completed in June 2023.
- 2.24 Natural England is currently considering the responses and determining whether a further statutory and public consultation will be needed if, as a result of comments received, the proposed area is changed. The potential designation of any additional new land as AONB is therefore some time off. In this respect, Policy CS2(1)(a) and (b) remain relevant in light of local circumstances and evidence.
- 2.25 Whilst local environmental circumstances have not changed to any considerable degree since the Core Strategy adoption in 2014, national policy and environmental law has moved on. The new local plan, which the Council has commenced preparation of, will be a single local plan including site allocations and development management policies as well as strategic policies (rather than as two parts as now) and will reflect these recent additional environmental requirements where needed.

Monitoring, local circumstances, and evidence

Monitoring, local circumstances, and evidence

- 2.26 Monitoring data published annually in the Council's [Environment and Sustainability Monitor](#) and available using this weblink, demonstrate that this policy is operating effectively.
- 2.27 Over the local plan period to date, in accordance with the [CS Monitoring Framework 2014](#) indicators for Policy CS2, no permissions for major development have been granted in the AONB and no decisions have been taken contrary to Natural England advice on ecology or landscape.
- 2.28 The Surrey Hills AONB boundary area is currently subject to Natural England's boundary review to consider its expansion. As Policy CS2(1)(a) applies the same level of protection strategically to the Area of Great Landscape Value (AGLV) being reviewed until there has been a review of AONB boundary (which is not yet completed).
- 2.29 The Council adopted a Green Infrastructure Strategy and Action Plan which was published on its website in August 2017, and has since been implementing its actions. This Strategy and Action Plan has informed the subsequent Development Management Plan, adopted in

September 2019. This includes designation of a new Local Nature Reserve at Banstead Woods / Chipstead Downs and the ongoing work on extending and improving the Horley Riverside Green Chain as part of the Horley North East and North West Sector new neighbourhoods.

- 2.30 A new Green Infrastructure Strategy and Action Plan is currently being prepared to inform the next local plan.
- 2.31 The extent of Sites of Special Scientific Interest (SSSI) and ancient woodland in the Borough has remained since the start of the plan period, in accordance with the [CS Monitoring Framework](#) for Policy CS2.

Policy CS2: Conclusion

- 2.32 Policy CS2 remains broadly consistent with national policy regarding requirements for the natural environment and biodiversity, despite some detailed changes to national planning policy. These include the NPPF requirement at paragraph 136 for policies and decisions to ensure that new streets are tree-lined, which are relevant to Development Management and site allocations policies rather than to strategic policies such as CS2.

Policy CS3: Green Belt

- 2.33 This policy provides the overriding local approach to the protection of a robust and defensible Green Belt within the Borough. For decision taking, it sets out that the overarching principle that permission will not be granted for inappropriate development unless very special circumstances exist. For plan making, it sets out the Council's approach for releasing land through the local plan process, including the scope of the Green Belt review that is to be carried out through the Development Management Plan.

Conformity with national policy and guidance

- 2.34 Core Strategy Policy CS3 sets out the strategic approach to the protection of a robust and defensible Green Belt within the Borough, and for the Council's approach for releasing land through the local plan making process, including the scope of the Green Belt review to inform the DMP.
- 2.35 For decision taking, Policy CS3(2) emphasises the national policy principle that permission will not be granted for inappropriate development unless very special circumstances exist.
- 2.36 Since September 2019, Policy CS3 is also implemented by DMP 'Policy NHE5: Development within the Green Belt' and NHE6: 'Reuse and adaptation of buildings in the Green Belt and the Rural Surrounds of Horley'.
- 2.37 Policies CS3 and DMP Policy NHE3 are consistent with national policy specifying that where the need to change Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies.
- 2.38 Policy CS3 is consistent with the requirement of NPPF Dec 2023 paragraph 145 for strategic local plan policies to establish whether Green Belt boundaries should be amended (having regard to their intended permanence in the long term to endure beyond the plan period). The detail of the land to be de-designated from Green Belt and allocated

for development to meet identified development needs is as set out in the DMP (in accordance with Policy CS3 (3, 4 and 5).

- 2.39 The December 2023 update to the NPPF amended the wording of paragraph 145, adding “*Authorities may choose to review and alter Green Belt boundaries*” to clarify and emphasise that the decision to review and alter Green Belt boundaries is for authorities to make, although it still requires “exceptional circumstances” to be fully evidenced and justified. Whilst this wording change has now made explicit that there is no requirement for local authorities to review and alter the Green Belt boundaries in their area, but rather that it is a choice for the local authority to make, this has not changed actual policy position.
- 2.40 The new national policy requirement to improve the environmental quality and accessibility of remaining Green Belt land following amending Green Belt boundaries for development through non-strategic policies (NPPF Dec 2023 paragraph 147) will be considered if needed in preparing the new local plan non-strategic and / or site allocation policies to reflect local requirements.
- 2.41 The issue of potential need to safeguard Green Belt land for development beyond the plan period (post-2027), as provided for by the NPPF Dec 2023 (paragraph 148 c, d and e) and as set out in Policy CS3(6), was included in the submission DMP, with land at Redhill Aerodrome proposed to be removed from its Green Belt designation and safeguarded for potential development post-2027.
- 2.42 The DMP inspector however concluded that the proposed safeguarding of land at Redhill Aerodrome with potential to re-designate it as Green Belt if the site is not deliverable, is not consistent with national policy. The policy was not therefore adopted.

Monitoring, local circumstances, and evidence

Monitoring, local circumstances, and evidence

- 2.43 Policy CS3(4) sets out the approach to be taken to a Green Belt Review through the DMP and policies map. The adopted DMP makes changes to Green Belt boundaries, including limited de-designation of Green Belt land to provide urban extensions when needed (under DMP Policy MLS1).
- 2.44 The Council’s monitoring data against the Core Strategy Framework show that Policy CS3 is performing well in its protection of the Green Belt but that equally, its application is not preventing achievement of the housing targets in the plan.
- 2.45 Over the plan period to date, 287 (net) homes have been built on previously developed land in the Green Belt, and 6 on greenfield land at Reigate Garden Centre, a total of 293 (net) new homes in the Green Belt.
- 2.46 Housing developments on previously developed Green Belt land include the re-development of the RNIB, Frith Park, and Darby House.
- 2.47 Other Green Belt developments permitted during this plan period include the approval in 2019 of the refurbishment and conversion of the listed Legal and General House, Kingswood to provide 130 assisted living and respite homes with support facilities, with a further 139 assisted living 1,2 and 3-bedroom flats provided through redevelopment of the surface car park and another building on the site. Other developments in the Green Belt, including primary and secondary schools, and traveller pitches have been justified by very special circumstances.

- 2.48 Whilst homes have been granted and built on brownfield sites in the Green Belt, where the [CS Monitoring Framework's](#) target is for zero, these permissions, are consistent with national policy (NPPF paragraph 154€ and (g) which allow limited infilling in villages and the partial or complete redevelopment of previously developed land (subject to conditions), and also the demonstration at the planning application stage (including at appeal) of “very special circumstances” that outweigh the consideration of inappropriate development within the Green Belt (as outlined under paragraph 153 of the NPPF Dec 2023).
- 2.49 The Council’s evidence demonstrates that the Green Belt in the Borough continues to serve an important strategic purpose, and that its boundaries remain relevant and robust. Of particular importance to the monitoring of Policy CS3 is the Council’s strategic Green Belt Review ‘[Sustainable Urban Extensions: Broad Locations Technical Report November 2012](#), undertaken to inform the Core Strategy, which you can view using the weblink provided. Of particular importance here are the Stage 4 Assessment of the relative contribution to Green Belt functions on page 23, and Annex 3 ‘Area of Search Assessment Tables’.
- 2.50 The Borough-wide Core Strategy Green Belt review identified only two broad areas within the Green Belt capable of accommodating sustainable, strategic-scale development without compromising the strategic function of the Green Belt. These locations were land East of Redhill / Merstham and land South / South West of Reigate.
- 2.51 These were consistent with the South East Plan, which was part of the development plan for the Borough during the Core Strategy’s preparation and the early examination stage, and identified a small-scale local review of the Green belt around Redhill-Reigate as likely to be required to support its role as a regional hub (CS IR paragraph 46).
- 2.52 The Core Strategy Inspector particularly noted that the evidence *“revealed that sustainable opportunities which do not undermine the aim and purposes of the Green Belt are very limited”* (CS IR paragraph 51). Additionally, he specifically recognised the importance of this part of London’s Metropolitan Green Belt in the Borough, highlighting that *“most Green Belt in the north of the borough...has a vital strategic role and function as a ‘green lung’ for the conurbation”*, and that the rest of the Green Belt in the Borough *“is fragmented in parts and the total area is not huge, especially when compared to other similar authorities nearby”*.
- 2.53 For these reasons the Inspector concludes (CS IR paragraph 53) that *“at a strategic level, only sites from these two broad locations comply fully with the criteria in the Framework and exhibit the exceptional circumstances necessary if Green Belt boundaries are to be altered”*.
- 2.54 These two broad locations (East Redhill / Merstham and South / South West of Reigate) were subsequently taken forward and examined further through the detailed Green Belt review carried out to inform the Development Management Plan Green Belt boundary changes and site allocations.
- 2.55 This subsequent more detailed Green Belt assessment work of the detailed boundaries of land parcels (as opposed to general areas) informed the Development Management Plan’s changes to Green Belt boundaries, and sustainable urban extension site allocations. These studies include the ‘[Development Management Plan \(Regulation 19\) Green Belt Review October 2017](#), which can be viewed using this weblink.
- 2.56 The specific sites considered to be sustainable and where local exceptional

circumstances justified amending Green Belt boundaries, were removed from the Green Belt and have been allocated for development.

- 2.57 Additionally, a detailed Green Belt assessment of 27 further areas of Green Belt was undertaken as part of the [‘Safeguarded Land report’](#) that accompanied the DMP. This considered areas beyond those identified as “broad areas of search”, including around Banstead, Earlswood and Salfords. This Study concluded that the vast majority (23 out of 27 areas) performed highly against at least one of the purposes of the Green Belt and, of those that did not, two out of four performed moderately against three or more purposes.
- 2.58 Informed by the ‘Safeguarded Land report’, the emerging DMP identified an area of land at Redhill Aerodrome to be removed from the Green Belt and safeguarded for potential housing development after the current plan period (under submission DMP Policy MLS2).
- 2.59 However, as summarised above, the DMP Inspector’s Report concluded that there was *“insufficient evidence to demonstrate the exceptional circumstances required for Redhill Aerodrome site to be released from the Green Belt and safeguarded for future development at this time”*, as a result of uncertainties regarding the deliverability of the site and its lack of support in the adjoining Tandridge local plan.
- 2.60 The Inspector therefore recommended that the safeguarded land be removed from the plan but did not indicate that alternatives needed to be found or should be reconsidered. As it transpired, Tandridge District Council did not include the Aerodrome in its submitted plan, and the land has not therefore been taken forward in either areas’ local plans.
- 2.61 With this significant evidence regarding the strategic importance and the strategic and local context regarding Green Belt in mind, it is clear that it is extremely unlikely that significant opportunities for further growth could be identified within London’s Metropolitan Green Belt without seriously undermining its strategic purposes and its integrity in this location. For these reasons, the broad extent of, and approach to, the Green Belt established through policy CS3 remains robust.
- 2.62 DMP Policy CS3 sets out the approach to be taken to a Green Belt Review specifically for the DMP, as reflected in the [CS Monitoring Framework](#) . Whilst this element of the policy has therefore been “delivered”, this does not mean it is out of date or in need of modification.

Policy CS3: Conclusion

- 2.63 No modification or update to Policy CS3 is required. Policy CS3 (parts 1 and 2) are consistent with national policy, whilst CS3 (parts 3 to 6) have run their course, as a Green Belt Assessment was undertaken to inform the DMP with the resulting sustainable urban extension sites allocated in the DMP 2019.

Policy CS4: Valued townscapes and the historic environment

- 2.64 This policy sets out the broad requirement for new development to be designed to maintain and protect the character of the Borough and, specifically, to respect, conserve and enhance the historic environment.
- 2.65 It requires that developments demonstrate high standards of sustainable construction, be of high-quality design taking direction from existing character and local distinctiveness, be

laid out to make best use of sites and protect biodiversity sites and links between them.

Conformity with national policy and guidance

- 2.66 Policy CS4 considers townscapes and the historic environment including heritage assets and their settings. The policy sets out the broad requirement for new development to be designed to maintain and protect the character of the Borough and, specifically, to respect, conserve and enhance the historic environment. It requires that developments demonstrate high standards of sustainable construction, be of high quality design taking direction from existing character and local distinctiveness, be laid out to make best use of sites and protect biodiversity sites and links between them.
- 2.67 As a strategic policy, CS4 is consistent with current national policy. The policy provisions of CS4 reflect the high-level ambitions of the NPPF in respect of design and protection of built heritage to conserve the historic environment (paragraph 196) as well as promoting well-designed places as promoted in NPPF Chapter 12. CS4 also encourages making best use of sites, broadly reflecting the aims of paragraphs 128 and 135.
- 2.68 The reference in Policy CS4 to the 'Design and Parking SPD' as an implementation document for the policy is now redundant, as these issues are now covered by the subsequently adopted 'Local Character & Distinctiveness Design Guide SPD 2021'.
- 2.69 The requirement to achieve "good design" is not a strategic planning issue, but rather a development management and site allocation issue. As such it is therefore implemented by DMP Policies and by design guides and codes such as the emerging 'A23 Great Street Design Code Supplementary Planning Document' (SPD) which was subject to a six-week statutory consultation in December 2023 and January 2024. This later emerging SPD, anticipated to be adopted in spring 2024, is consistent with the national Design Codes policy.
- 2.70 In May 2022 funding and assistance was received from the Department for Levelling Up, Housing and Communities (DLUHC)'s Office for Place under the "Design Code Pathfinders Programme" Phase 3, which has helped the Council to produce its draft 'A23 Great Street' Design Code SPD, and a digital 3D model of the Redhill to Horley area. Although not itself a strategic issue, production of Design Code SPDs is helping to implement Policy CS4.
- 2.71 DLUHC have started Phase 3 of the Pathfinder programme, and in October 2023, RBBC was selected to receive further government funding and assistance to work on two different workstreams. The first workstream (DLUHC's "workstream 3" is the implementation and monitoring of the Design Code, which involves testing our design code and noting the impacts it is having (or likely to have) on planning applications and their assessments. The second workstream (DLUHC's "workstream 4") is the digitalisation of the Design Code, which involves development of a Digital (website) Design Codes to improve its usability and utility.

Monitoring, local circumstances, and evidence

- 2.72 In measuring the effectiveness of this strategic policy, monitoring evidence shows that no developments affecting designated heritage assets have been granted against Historic England advice since the Core Strategy was adopted, which is a CS Framework Indicator for Policy CS4. The number of buildings and / or assets in the Borough that are on the

Heritage at Risk register has remained very low (just one asset). This demonstrates that Policy CS4 is working effectively at the strategic level to protect the Borough's heritage assets.

- 2.73 The policy is supplemented by detailed design requirements in Development Management Plan Policy NHE9.
- 2.74 The 'Local Character & Distinctiveness Design Guide SPD' was adopted in June 2021, and as acknowledged in Appendix 1 of the SPD, it supports Core Strategy Policy CS4. The SPD provides an overview of the character and identity of the Borough, highlighting the distinctiveness qualities of the different character areas. It contains guidelines to help to protect and enhance local character areas, amplifying local plan policies, including CS4.
- 2.75 The 'Climate Change and Sustainable Construction SPD' 2021 supports the design of development to mitigate and adapt to the challenges of climate change. The SPD supports Core Strategy policy CS4, as referenced in appendix 3, CS4 is a policy that should be considered in conjunction with the SPD.
- 2.76 The emerging Green Infrastructure Study and draft 'A23 Great Street Design Code SPD' are intended to support policy.
- 2.77 The Council's '[Heritage Strategy](#)' (Oct 2017, updated May 2018) sets out the legal, national and local obligations of the Council to identify, protect and enhance the historic assets in the Borough. The Strategy acknowledges CS4 as being the main Core Strategy policy regarding heritage and identifies any appropriate actions for the Council to undertake moving forwards which is set out using seven key heritage priorities.
- 2.78 The key actions regarding 'Delivering an effective planning and conservation service' are as follows:
- i) Continue to operate a high quality development management service regarding protection and enhancement of the historic environment in the borough, as set out in previous sections, including consultation of the evidence base, and work with various partners
 - ii) Continued availability of the conservation officer, in particular given the likelihood of increased development pressure in the borough (and the continued need to carry out statutory duties)
 - iii) Continued provision of advice regarding adaptations to historic buildings allowing sustainable energy use.
- 2.79 The key actions regarding 'Plan Making' are as follows:
- i) Continue with the review of local plan documents, specifically the Development Management Plan.
 - ii) Consider the need to update supporting supplementary documents once the DMP is adopted (see below).
- 2.80 Monitor the delivery of Core Strategy and Development Management Plan policies through annual Plan Monitoring arrangements, and where necessary identify management actions.

Policy CS4: Conclusion

- 2.81 No modification or update to Policy CS4 is required.

Policy CS5: Valued people and economic development

- 2.82 The policy establishes that the Council will promote and support continued sustainable economic prosperity of the Borough focussing on improvements in Regeneration Area, sustaining areas that already prosper, recognising, and nurturing the different economic roles of the Borough, including maximising its position within the Gatwick Diamond and Coast to Capital Local Enterprise partnership (LEP).
- 2.83 The policy plans for delivery of additional employment space to meet needs, focussing on retaining and making best use of existing sites but also providing flexibility for new sites to come forward in sustainable locations. The policy also establishes a commitment to work with partners to deliver improvements to health, education and community engagement.

Conformity with national policy and guidance

- 2.84 The policy is consistent with the provisions of the NPPF December 2023, notably paragraphs 85-87 in that it establishes a high-level framework to drive local economic prosperity, and seeks to ensure that there is appropriate space to attract business and allow them to grow.
- 2.85 The Policy focuses development within the plan period on intensification of existing sites, but with flexibility [as required by 86(b)] for new sites to come forward to address unanticipated needs [as required by 86(d)].
- 2.86 The high-level commitment to working with partners to address educational and health needs is consistent with the broad aims of paragraphs 100 and 101 of the NPPF.
- 2.87 The focus on regeneration of key areas and estates is consistent with paragraph 98, as well as the wider aims of delivering well-designed places and making best use of accessible locations.

Monitoring, local circumstances, and evidence

- 2.88 Data from Planning Monitoring Reports demonstrates that significant positive progress has been made in bringing forward development sites and environmental improvements in key regeneration areas.
- 2.89 In Preston, new leisure and community facilities have been completed, environmental improvements implemented, and the two major housing sites (Merland Rise and De Burgh) have been completed.
- 2.90 In Merstham, new retail and community facilities have been delivered and the former local centre on Portland Drive has been redeveloped for mixed tenure housing.
- 2.91 Significant progress has been made in delivering improvements in Redhill Town Centre with four key sites completed.
- 2.92 Transport improvements in the town centre through the Balanced Network and Local Sustainable Transport Fund (LSTF) projects have also been implemented, along with public realm upgrades.
- 2.93 The two new neighbourhoods in Horley are significantly progressed (the North East Sector is complete), and the site-specific and town-wide infrastructure required to support these is also well progressed. There is therefore no evidence that these regeneration initiatives are

unachievable or that they ought to be revisited, the uncertainty risked thereby could undermine the current progress.

- 2.94 Monitoring of employment development demonstrates a significant net loss of employment space over the Core Strategy plan period to date; however, this reflects market changes and introduction of more extensive permitted development rights at the national level. To date, the losses are not considered to have significantly hampered economic prosperity and planning decisions more widely have protected other employment sites where appropriate. Planning applications for new office and commercial units continue to be processed. However, this area will continue to be carefully monitored.
- 2.95 Consistent with the policy, the Council continues to work with partners and neighbouring authorities in the Gatwick Diamond particularly to explore opportunities to promote economic growth. Whilst Covid has significantly altered working practices with more people working from home, technical advice in 2021 has confirmed that there remains a strong demand for employment floorspace.
- 2.96 As with housing needs, future growth at Gatwick Airport could give rise to implications for, and a need to reconsider, the economic strategy and the approach to delivery of employment needs. However, until the Development Consent Order for the proposed North Runway is decided by the Examining Authority (expected late 2024), the scale and type of growth at Gatwick Airport is still to be realised. The DCO application documentation sets out the plans for the intended growth of Gatwick Airport. An extended Northern Runway in full operational use has potential to alter the economic landscape and employment land situation, though from the Development Consent Order application submission documents it appears that much of the benefits of the related economic growth would affect the area south of the airport.
- 2.97 Analysis of economic data also indicates that the Borough has continued to experience both jobs and business growth over the plan period, at a rate broadly comparable to Surrey and the wider South East. For example, Experian Local Market Forecasts indicates that the number of employee jobs in the Borough stood at 69,400 in 2023, compared to 62,100 in 2012 at the start of the plan period (11.1% increase).
- 2.98 This is corroborated by comparable data from the Office for National Statistics' "Business Register and Employment Survey" (BRES), which indicates that in 2023, there were 72,000 employee jobs in the Borough, up from 62,000 in 2012 (16.1% increase). This compares favourably with similar data for the county of Surrey as a whole, which shows an increase of 6.4% in employees based on the BRES data. Data on business counts (the number of businesses in an area), shows an increase from 5,855 businesses in Reigate & Banstead at the start of the plan period in 2012, to 7,760 in 2023 – equivalent to a 32.5% increase. This compares to 13.4% growth across Surrey and 22.5% across the South East region as a whole. These key statistics do not therefore indicate any evidence of local economic "underperformance", and indicates that Policy CS5 is still effective.
- 2.99 In accordance with Policy CS5: Valued People and Economic Development, paragraphs 5.5.6, 5.5.8 and 5.5.11, the Borough has considerable potential for locating new strategic employment development opportunities due to its central position in the Gatwick Diamond economic area, between Gatwick Airport and London, and with excellent transport links to central London, the wider South east, and national and international locations via its enviable road and rail connections. In accordance with this identified opportunity, the Council has allocated (in Policy HOR9 of the 2019 DMP), a strategic

employment development site south of Horley town, in the far south of the Borough, almost bordering Gatwick Airport.

Policy CS5: Conclusion

2.100 No modification or update to Policy CS5 is required.

Policy CS6: Allocation of land for development

2.101 The policy establishes the overall strategy for the delivery and allocation of land to meet development needs in the Borough. It defers allocation of sites to the DMP but provides a strategy for doing so. In particular, it sets out an “urban area first approach” giving priority to the allocation of land in sustainable locations in the urban area with a particular focus on the priority locations for growth and regeneration (Redhill, Horley, Horley new neighbourhoods), Preston and Merstham regeneration areas, followed by sites and other sustainable opportunities elsewhere in the built-up areas.

2.102 The policy also identifies a number of specific locations (countryside around east of Redhill and Merstham, south / south west Reigate, and south east of Horley) where sustainable urban extensions are proposed to be brought forward through the DMP.

Conformity with national policy and guidance

2.103 The policy provides a robust strategy for meeting the development targets established through the Core Strategy, including the housing requirements.

2.104 The approach of Policy CS6 to prioritising and making best use of urban area is consistent with national policy, in particularly NPPF 2023 paragraphs 123 to 125 in relation to making best use of previously developed land. Also paragraph 146 requires strategic policy-making authorities with Green Belt designed land to demonstrate that they have fully examined all other reasonable options for meeting identified development needs before concluding that exceptional circumstances exist to justify changing Green Belt land boundaries.

2.105 The approach also reflects NPPF Dec 2023 paragraph 109 that seeks to ensure patterns of growth are actively managed to reduce the need for travel and make best use of sustainable travel networks.

2.106 Consistent with national policy (NPPF paragraph 70(d)), CS6 facilitates the development of windfall sites, and monitoring shows that over the plan period to date, windfall sites in suitable sustainable urban areas have provided a substantial source of the Borough’s housing completions to date.

2.107 Further discussion on the consistency of the R&B Core Strategy’s “urban areas first” approach, and specifically the management of the release of greenfield sites for urban extensions, is provided further under Policy CS13.

2.108 As detailed under the Review of Policy CS13 below, the proportion of homes built on small and medium sized sites (under one hectare) has significantly exceeded the Government’s 10% requirement (NPPF Dec 2023 paragraph 70), underlining that the approach in Policy CS6 to development land supply is achieving excellent overall delivery and a very broad mix of sites, consistent with current national policy.

Monitoring, local circumstances, and evidence

Monitoring, local circumstances, and evidence

- 2.109 Data indicates that the strategy for the allocation of land for development is operating effectively. In respect of housing requirements, 6,303 net homes have been delivered between the beginning of the plan period and 31 March 2023, representing an oversupply against the local plan (annualised average) housing requirement to date of 1,243 units.
- 2.110 The Council is currently able to demonstrate a deliverable land supply equivalent to 7.80 years against the Core Strategy housing requirement (as demonstrated in the Council's Housing Monitor 2023), significantly in excess of the 5-year requirement required by national policy.
- 2.111 Policy CS6 is therefore clearly operating and performing effectively in ensuring sufficient and appropriate land is available to meet housing needs and is considered capable of doing so for the remainder of the plan period based on the Council's latest housing trajectory.
- 2.112 Since the beginning of the plan period (2012), the proportion of homes and non-residential development built on previously developed land (PDL) has exceeded the targets set out in the [Core Strategy Monitoring Framework](#) for Policy CS10 Sustainable Development (50% and 90% respectively).
- 2.113 Significant progress has been made in the delivery of development and improvements in the regeneration areas and priority locations for growth identified by Policy CS6, including the regeneration areas of Preston, Merstham and Horley Town Centre (see Core Strategy paragraphs 6.4.4, 6.4.7, 6.6.7, and 6.8.7), and the growth areas of Horley North East and North West sectors.
- 2.114 The percentage of development delivered on unallocated sites outside the urban area each year has been less than 10% on average over the plan period to date, demonstrating that compliance with the plan-led strategy set out in Policy CS6 is proving robust.
- 2.115 The Core Strategy examination concluded that a suitable windfall allowance for sites not identified in the Strategic Housing Land Availability Assessment (SHLAA) or CS was 50 dwellings per annum (dpa), which in accordance with national policy excluded potential from residential garden land. This was expected to increase significantly as a result of the then temporary office to residential permitted development regime being extended.
- 2.116 In 2018, the Inspector examining the Development Management Plan found a windfall allowance of 75 dpa to be robust and justified in light of the actual windfall rates since 2012/13 being significantly higher than 75dpa due in part to inclusion of prior approvals for office to residential conversion.
- 2.117 The level of windfall development in the Borough, including suitable sustainable garden land residential developments, has consistently exceeded 150 units per annum over the plan period to date, with a mean annual average of 263 per annum across the plan period to date.
- 2.118 The DMP includes major urban allocations and sustainable urban extension allocations (when needed), to assist in delivering the requirements of Policy CS6. As of mid-November 2023, 180 homes have been completed on sites allocated in the DMP with

further 36 homes permitted but not completed.

Policy CS6: Conclusion

2.119 No modification or update to Policy CS6 is required.

Policy CS7: Town and local centres

2.120 Policy CS7 sets out the overall approach to maintaining and enhancing the role of the Borough's town and local centres, and the strategy for delivering retail and leisure growth to support this. It sets out that the majority of comparison and convenience retail growth will be directed to Redhill, with only limited growth anticipated for other centres.

2.121 The policy identifies Redhill as the Boroughs primary town centre and, as a consequence, the main focus for large scale office, retail, cultural and leisure developments. In all other centres, the policy sets out an ambition to maintain a balance of uses and development that promote vitality and viability of each of those centres. It seeks to ensure that local centres continue to provide accessible local services.

Conformity with national policy and guidance

2.122 Policy CS7 is consistent with current national policy. In accordance with Paragraph 90 (a) of the Dec 2023 NPPF, a network and hierarchy of town centres is defined by Policy CS7, with Redhill identified as the primary town centre, with a focus on large-scale developments, followed by the remaining the town centres of Reigate, Horley and Banstead, and then by a range of local centres of different sizes located across the Borough.

2.123 Policy CS7 is also consistent with national policy (NPPF paragraph 90) in highlighting the need to promote the vitality and viability of the centres through a balance of uses and development.

2.124 The policy also sets out the overall pattern and strategy for retail growth, as required by NPPF paragraph 20.

Monitoring, local circumstances, and evidence

2.125 Local monitoring of retail development and completions shows that the policy is operating effectively.

2.126 In relation to the retail needs summarised in paragraph 6.3.6 of Policy CS7, which were informed by the R&B Retail & Leisure Needs Update Study 2011, it is notable that the Development Management Plan (DMP) adopted 26 Sept 2019, formally updated these needs figures through an updated Retail Needs Assessment 2016 (see DMP paragraph 1.2.9).

2.127 Since the adoption of the Core Strategy, many large-scale developments have been planned or built in Redhill. This includes the Sainsbury's/Travelodge development, and currently with the development at Marketfield Way (The Rise), in accordance with Policy CS7. Suitable developments have still occurred in the remaining town and local centres to promote their vitality and viability.

- 2.128 Although vacancy rates in town centres have fluctuated (see [Town Centre Monitoring Reports published online](#) annually, in particular Figure 8 of the 2023 Monitor), vacancy rates within Reigate and Banstead town centres have been generally lower than the [Core Strategy Monitoring Framework](#) target of 5% vacancy rate for both number of vacant units and vacant frontage length. Horley's retail vacancy rates are fairly dynamic, fluctuating over the plan period between 3 and 11%, indicating a turnover of tenants. Only Redhill town centre has suffered from considerable town vacancies over the plan period, with vacancies remaining above 8%. However, as stated in Policy CS6, Redhill town centre is a priority location for regeneration. The [Autumn 2023 "Borough News"](#) includes information on the on-going regeneration of Redhill Town Centre, including through the Council's use of its Community Infrastructure and planning obligations funding.
- 2.129 The Town Centre Monitor 2023 shows the percentage of vacant units for all of the Borough's town centres is 8.7%, whilst for vacant frontage length this is 11.0%. The percentage of vacant units is lower than the national vacancy rate for in the first quarter of 2023, at 13.8%.
- 2.130 Given the requirement for permitted development rights changes of use to residential use currently requiring demonstration of a vacancy period for a change of use to residential to be permitted, and alongside the considerable move of retailing to on-line sales (e-tailing), the use of vacancy rates as a monitoring indicator in future local plans will be considered.
- 2.131 The network of Local Centres within the Borough designated by the Development Management Plan 2019 under Policy CS7 (2b) is monitored and reported annually in the [Local Centre Monitors published on the Councils website, and available using this link](#).
- 2.132 The Local Centre Monitors show that they continue to serve their purpose of providing accessible, local services to those that live locally, with the vacancy rate of units in all local centres at 7.9% as of the 2023 Local Centre Monitor. The evidence from this therefore suggests that Policy CES7 is still effective and does not need updating. However an Article 4 Direction is being considered in order to further protect town and local centres following the recent expansion of retail to residential permitted development rights.
- 2.133 Retail needs evidence to support the DMP identified that retail space needs are now lower than envisaged in the evidence supporting the Core Strategy, largely because of significant structural changes in the retail market, driven by changing consumer habits and growth in special forms of trading.
- 2.134 Notably, the evidence now identifies a need for 12,900sqm of additional comparison retail space across the Borough and no significant quantitative need for convenience retail up to 2027 (compared to 25,800sqm and 11,700sqm respectively in the Core Strategy). However, in respect of retail needs, the policies in the Core Strategy acknowledged the need for regular monitoring.
- 2.135 The evidence of reduced needs and delivery of retail growth does not render Policy CS7 ineffective or out of date. The reduced needs give greater confidence that retail growth needs can be fully accommodated within the network of town and local centres as envisaged in Policy CS7.

Policy CS7: Conclusion

- 2.136 Policy CS7 remains consistent with national policy, whilst the local monitoring evidence suggests that the criteria within the policy are still relevant to how town and local centres perform today. Therefore, the policy does not require updating.

Policy CS8 : Area 1 - The North Downs

- 2.137 Policy CS8 (Area 1) sets out the overall strategy for growth in the North Downs area of the Borough, including the scale and location of development anticipated and the infrastructure required in support of this.
- 2.138 It plans for at least 930 homes in the urban area in the North Downs, of which 340 are planned for Preston Regeneration Area and 180 in Banstead Village Centre.
- 2.139 The Policy also plans for approximately 2,000sqm of additional employment space, at least 1,300sqm of comparison retail floorspace and 1,200sqm of convenience retail. These retail figures were reduced on adoption of the Development Management Plan in September 2019 to approximately 1,100sqm comparison and zero convenience.
- 2.140 The Policy sets out the key infrastructure required to support the Preston Regeneration Area, in the form of leisure / community facilities, transport improvements, including highway improvements at the A240 / B221 junction.

Conformity with national policy and guidance

- 2.141 NPPF 2023 (paragraph 20) requires strategic policies to set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking; and to make sufficient provision for housing, employment, retail, leisure and other commercial development; strategic transport, water, flood mitigation and energy infrastructure, community uses including health, education and cultural; and for conserving and enhancing the natural, built and historic environments.
- 2.142 Policy CS6 (Area 1) follows the overarching strategy for allocation of land for development set out in Policy CS6, whilst additionally providing specific detail for the North Downs area.
- 2.143 The Policy is consistent with national policy; it encourages making best use of urban land (NPPF paras 123, 124 and 146) given the considerable constraints to development in the Borough, including designation of approximately 70% of its land area as Green Belt. Policy CS8 focusses in particular on the key regeneration area of the Preston, in accordance with Policy CS6 and NPPF paragraph 98.
- 2.144 The policy also seeks to make provision for sufficient infrastructure as required by NPPF paragraph 20.

Monitoring, local circumstances, and evidence

- 2.145 Housing completions data provided in the Council's annual Housing Monitor shows that the Policy requirement of "at least 930" additional homes within the North Downs' (Area 1) urban areas has already been exceeded, with 1,244 net additional homes completed between 01 April 2012 – 31 March 2023.

- 2.146 This includes delivery of over 452 additional homes in the Preston Regeneration area (compared to the Policy target of 340) to 31 March 2022, of which 229 homes were at the former De Burgh site and 130 homes at the Merland Rise development site. In contrast, development over the plan period to date within Banstead Village has been fairly limited (20 additional homes on unallocated “windfall” sites) against its CS8 policy target of 180 additional homes. However, the allocation in the DMP 2019 of three sites within Banstead Village town centre and one opportunity site, with capacity for over 95 additional homes has potential to improve this within this plan period to 2027. In late 2023, 53 extra care residential flats were approved on the Surrey County Council-owned Horseshoe site but have not yet been built.
- 2.147 On adoption of the Development Management Plan (DMP) on 26 September 2019, the retail floorspace requirement for Area 1 was reduced, to approximately 1,100sqm of comparison retail floorspace, and no significant quantitative need for convenience retail floorspace. These updated requirements are set out in DMP Tables 4, 8 and 9 (see paragraphs 123 and 124 of the [DMP Inspector’s Report](#) of 9 July 2019 which can be accessed using this weblink). Since April 2012, 455 sqm of net additional comparison retail floorspace has been delivered (gain of 2,275sqm and loss of 1,820sqm).
- 2.148 These figures do not include any development completions under the new “E” Use Class since September 2020 when it was introduced.
- 2.149 Whilst Policy CS8 (Area 1) planned for an additional approximately 2,000sqm of employment floorspace in the plan period, to date since 2012, just over 14,450sqm of employment uses (within the former B1, B2 and B8 Use Classes) were “lost” from this area.
- 2.150 With regards to delivery of the **CS8 infrastructure priorities for Area 1**, in October 2015, a new community hub at Tadworth Leisure & Community Centre and Phoenix Youth Club was opened, including a swimming pool, gym, studios, football pitches, changing rooms, community space, a café, children’s nursery.
- 2.151 Completed transport improvements to support the area’s development have included the introduction of Better Bus services and bus stop upgrade works in Merland Rise, the adoption of Preston Manor Road, resurfacing of Chetwode Road, and additional on-street parking at Chetwode Road and Homefield Gardens.
- 2.152 A developer’s s106 planning contribution of £89,612 was paid to Surrey County Council (SCC) on 1 April 2020 towards SCC’s Highway improvements to increase the capacity of the junction of the A240 Reigate Road with the B221 Great Tattenhams.

Policy CS8 (Area 1): Conclusion

- 2.153 The Council updated the retail requirement of this policy through the adoption in Sept 2019 of the DMP Tables 4, 8 and 9. No other modifications or updates to this policy are needed.

Policy CS8 : Area 2a - Redhill including Merstham

- 2.154 Policy CS8 (Area 2a) sets out the overall strategy for growth in the Redhill area of the Borough, incorporating Redhill town centre. As with the North Downs area, this policy sets out the scale and location of development anticipated and the infrastructure

- required in support of this. It plans for at least 1,330 homes in the urban area of Redhill, of which 750 are planned for Redhill town centre and 50 in Merstham regeneration area.
- 2.155 A further maximum of 500-700 homes are planned within sustainable urban extensions to the east of Redhill and Merstham.
- 2.156 The Policy plans for approximately 7,000sqm of employment space within Redhill town centre, and a further 13,000 to be provided in the remainder of Area 2a - Redhill and Area 2b - Reigate predominantly through reuse and intensification of existing employment land.
- 2.157 The Policy plans for delivery of an additional 15,480sqm of additional comparison retail floorspace in Redhill town centre; and at least 7,020sqm of convenience retail across Area 2a and 2b the majority in Redhill town centre and a limited amount in Reigate town centre. These retail figures were reduced on adoption of the Development Management Plan in September 2019 to approximately 7,500sqm comparison and zero convenience.
- 2.158 The Policy also identifies key supporting infrastructure required, which includes the Balanced Network Highway scheme in Redhill, new primary and secondary schools, waste processing improvements at Earlswood Depot, and a new community hub in Merstham.

Conformity with national policy and guidance

- 2.159 NPPF 2023 (paragraph 20) requires strategic policies set out an overall strategy for the pattern, scale and design quality of places; and to make sufficient provision for housing, employment, retail, leisure and other commercial development; strategic transport, water, flood mitigation and energy infrastructure, community uses including health, education and cultural; and for conserving and enhancing the natural, built and historic environments.
- 2.160 Policy CS8 (Area 2a) follows the overarching strategy for allocation of land for development set out in Policy CS6, whilst additionally providing specific detail for the Redhill area.
- 2.161 The Policy is consistent with national policy; it encourages making best use of urban land (NPPF paras 119, 120 and 141) given the considerable constraints to development in the Borough, including designation of some 70% of its land as Green Belt. The Policy focusses in particular on the key regeneration area of the Merstham, and on Redhill town centre, as well as the wider built-up area of Redhill, in accordance with Policy CS6 and NPPF paragraph 94.
- 2.162 The policy also seeks to make provision for sufficient infrastructure as required by NPPF paragraph 20.

Monitoring, local circumstances, and evidence

- 2.163 Housing completions data provided in the Council's annual Housing Monitor shows that the Policy requirement of "at least 1,330" additional homes within the Redhill' (Area 2a) urban area by 2027 has already been exceeded, with 1,368 net additional homes completed between 01 April 2012 – 31 March 2023. This is made up of 1,558 gross completions minus the "loss" of 190.
- 2.164 The 1,368 includes 648 net additional homes delivered in Redhill town centre against its

CS8 target of 750.

- 2.165 Within Merstham regeneration area, 68 net additional homes had been delivered by 30 March 2017 compared to the target for this area of 50.
- 2.166 The Development Management Plan (DMP) 2019 allocates five sustainable urban extensions to the east of Redhill and Merstham that together will deliver approximately 465 additional homes, when they are needed under the Council's urban-first spatial development strategy, only once the urban allocations and windfalls are predicted to provide insufficient delivery. This number of homes on urban extension sites is within the "up to 500-700" amount included for this area in Policy CS8 (Area 2a).
- 2.167 The lack of further identifiable suitable sustainable sites to meet the lower end of the range for urban extension sites in this area emphasises the degree of constraint in the Borough and the consequently limited likelihood that further suitable sustainable urban extensions within existing Green Belt designated land could be identified to achieve a higher housing requirement.
- 2.168 On adoption of the Development Management Plan (DMP) in 2019, the retail floorspace requirement for Area 2a was reduced, so that since late September 2019, it has been approximately 7,500sqm of comparison retail floorspace, and no significant quantitative need for convenience retail floorspace.
- 2.169 These updated requirements are set out in DMP Tables 4, 8 and 10 (see paragraphs 123 and 124 of the [DMP Inspector's Report](#) of 9 July 2019 which can be accessed using this weblink).
- 2.170 Since April 2012, there has been an overall net gain of approximately 4,424sqm of net additional retail floorspace delivered (which includes the gain of 7,894sqm and loss of 3,470sqm).
- 2.171 Policy CS8 (Area 2a) plans for approximately 7,000sqm of additional employment floorspace in Redhill town centre, predominantly through reuse and intensification of existing employment land including offices in Redhill Town Centre. However, Redhill town centre has actually seen a net loss of 19,287sqm of employment uses (within the former B1a use Class), which includes within it a gain of 5,540sqm of new office floorspace, primarily due to the national permitted development change of use, which takes such developments out of the Council's control.
- 2.172 The three of Borough's four Principal Employment Areas in the Brough, designed through the DMP, are within Area 2a, outside of Redhill Town Centre.
- 2.173 Infrastructure delivery in the Redhill urban area (Area 2a) to support its development has been considerable. Merstham Park School 6FE secondary school opened in 2018, as a non-selective free school which is part of the Glyn Learning Foundation (GLF) Trust, it serves Redhill, Merstham and Reigate. Also, St Bede's Secondary School, Carlton Road, Redhill was expanded from 9 to 11 forms of entry (FE) in 2019, with the building works being part-funded by RBBC's Community Infrastructure Levy (CIL).
- 2.174 The 2FE Lime Tree Primary school opened in 2013, as well as Hatchlands Primary School, a Free School in Redhill, which opened on the former law courts site in September 2018.
- 2.175 Mersham Community Hub in Portland Drive was opened in 2017, and includes a new Merstham Library, Youth Centre and Community facility (including a café and community

rooms), and now provided a well-used community facility for this regeneration area.

- 2.176 The Council is working closely with SCC on an improvement scheme for the junction of the A23 with Three Arch Road, which includes an allocation of over £1.6m of Community Infrastructure Levy (CIL) funding towards the scheme, which is to start work on site in 2024.

Policy CS8 (Area 2a): Conclusion

- 2.177 The Council updated the retail requirement of this policy through the adoption in Sept 2019 of the DMP Tables 4, 8 and 10. No other modifications or updates to this policy are needed.

Policy CS8 : Area 2b - Reigate and remainder of Area 2

- 2.178 Policy CS8 (Area 2b) sets out the overall strategy for growth in the Reigate area and remainder of the central urban area of the Borough. The policy establishes the scale and location of development anticipated and the infrastructure required in support of this.
- 2.179 It plans for at least 280 homes in Reigate urban area, plus a further maximum of 500-700 homes within sustainable urban extensions to south / south west of Reigate.
- 2.180 The Policy plans for approximately 13,000sqm of employment space, to be provided across Area 2b and Area 2a Redhill (excluding Redhill town centre), predominantly through reuse and intensification of existing employment land.
- 2.181 The policy also plans for an additional 3,870sqm of additional comparison retail in Reigate urban area, and at least 7,020sqm of convenience retail floorspace, the majority in Redhill town centre and a limited amount in Reigate town centre. These retail figures were reduced on adoption of the Development Management Plan in September 2019 to approximately 2,500sqm comparison and zero convenience.
- 2.182 Key infrastructure needs identified by Policy CS8 (Area 2b) are limited to expansion of existing primary schools in the Redhill / Reigate area (1 additional form of entry) and need for water treatment works expansion (which is needed for development across the Borough and to support development in adjoining boroughs).

Conformity with national policy and guidance

- 2.183 NPPF 2023 (paragraph 20) requires strategic policies to set out an overall strategy for the pattern, scale and design quality of places; and to make sufficient provision for housing, employment, retail, leisure and other commercial development; strategic transport, water, flood mitigation and energy infrastructure, community uses including health, education and cultural; and for conserving and enhancing the natural, built and historic environments.
- 2.184 Policy CS6 (Area 2b) follows the overarching strategy for allocation of land for development set out in Policy CS6, whilst additionally providing specific detail for the Reigate built up area and the remainder of the Area 2 land outside of Redhill and Merstham.
- 2.185 The Policy is consistent with national policy; it encourages making best use of urban

land (NPPF paras 119, 120 and 141) given the considerable constraints to development in the Borough, including designation of some 70% of its land as Green Belt. The Policy focusses in particular on the built-up area of Reigate, in accordance with Policy CS6.

- 2.186 The policy also seeks to make provision for sufficient infrastructure as required by NPPF paragraph 20.

Monitoring, local circumstances, and evidence

- 2.187 Housing completions data provided in the Council's annual Housing Monitor shows that the Policy requirement of "at least 280" additional homes within Area 2b - Reigate and remainder of Area 2 by 2027 has already been far exceeded, with 632 net additional homes delivered since April 2012.
- 2.188 The Development Management Plan (DMP) 2019 allocates four sustainable urban extensions to the south and west of Reigate that together will deliver approximately 335 additional homes, when they are needed under the Council's urban-first spatial development strategy, only once the urban allocations and windfalls are predicted to provide insufficient delivery. This number of homes on urban extension sites is within the "up to 500-700" amount included for this area in Policy CS8 (Area 2b).
- 2.189 The lack of further identifiable suitable sustainable sites to meet the lower end of the range for urban extension sites in this area emphasises the degree of constraint in the Borough and the consequently limited likelihood that further suitable sustainable urban extensions within existing Green Belt designated land could be identified to achieve a higher housing requirement.
- 2.190 On adoption of the Development Management Plan (DMP) in 2019, the retail floorspace requirement for Area 2b was reduced, so that since late September 2019, it has been approximately 2,500sqm of comparison retail floorspace, and no significant quantitative need for convenience retail floorspace.
- 2.191 These updated requirements are set out in DMP Tables 4, 8 and 11 (see paragraphs 123 and 124 of the [DMP Inspector's Report](#) of 9 July 2019 which can be accessed using this weblink).
- 2.192 Since April 2012, there has been an overall net loss of approximately 5,200sqm of retail floorspace within Area 2b, mostly developments involving losses of retail floorspace, with only approximately 400sqm of new retail floorspace built.
- 2.193 Policy CS8 (Area 2b) plans for approximately 13,000sqm of additional employment floorspace across Areas 2a and 2b excluding Redhill town centre (predominantly through reuse and intensification of existing employment land including offices).
- 2.194 On the ground, since 2012, Area 2b has actually seen a net loss of 15,450sqm of employment floorspace (within which is the gain of 1,247sqm and loss of 16,697sqm). 6,341sqm of this employment floorspace lost from Area 2b was due to permitted development, over which the Council has no control.
- 2.195 With regard to infrastructure needs identified in Policy CS8 (Area 2b), a considerable number of additional primary school places have been completed in Redhill / Reigate to meet the identified needs from new developments.

Policy CS8 (Area 2b): Conclusion

- 2.196 The Council updated the retail requirement of this policy through the adoption in Sept 2019 of the DMP Tables 4, 8 and 11. No other modifications or updates to this policy are needed.

Policy CS8 : Area 3 The Low Weald

- 2.197 Policy CS8 (Area 3) sets out the overall strategy for growth in Horley town centre priority regeneration area, the wider Horley town outside of the town centre, the Horley North East and North West sectors, as well as small scale sustainable urban extensions to Horley town, be tested and delivered through the DMP.
- 2.198 The policy establishes the scale and location of development anticipated and the infrastructure required to support this.
- 2.199 It plans for at least 2,440 additional new homes, which includes 1,570 in the Horley North West Sector (therefore at least 870 outside of it), and a further maximum of 200 homes as sustainable urban extensions to Horley town.
- 2.200 The policy requirements also include approximately 24,000sqm of additional employment floorspace to be provided predominantly through reuse and intensification of existing employment land.
- 2.201 The policy also plans for an additional 3,870sqm of additional comparison retail and at least 2,340sqm of convenience retail in Horley town centre. These retail figures were reduced on adoption of the Development Management Plan in September 2019 to approximately 800sqm comparison and zero convenience.
- 2.202 Infrastructure needs identified by Policy CS8 (Area 3) for this area are considerable and diverse.

Conformity with national policy and guidance

- 2.203 NPPF 2023 (paragraph 20) requires strategic policies to set out an overall strategy for the pattern, scale and design quality of places; and to make sufficient provision for housing, employment, retail, leisure and other commercial development; strategic transport, water, flood mitigation and energy infrastructure, community uses including health, education and cultural; and for conserving and enhancing the natural, built and historic environments.
- 2.204 Policy CS8 (Area 3) follows the overarching strategy for allocation of land for development set out in Policy CS6, whilst additionally providing specific detail for the Low Weald area.
- 2.205 The Policy is consistent with national policy; it encourages making best use of urban land (NPPF paras 119, 120 and 141) given the considerable constraints to development in the Borough. The Policy focusses in particular on Horley town centre, as well as the wider built-up area of Horley, in accordance with Policy CS6 and NPPF paragraph 94.
- 2.206 The policy also seeks to make provision for sufficient infrastructure as required by NPPF paragraph 20.

Evidence and local circumstances

- 2.207 Policy CS8 (Area 3) sets out the target for at least 2,400 additional new homes within the urban area of Horley, which includes up to includes 1,570 in the Horley North West Sector (therefore at least 870 in the urban area outside of the NW Sector), and a further maximum of 200 homes within sustainable urban extensions to Horley.
- 2.208 Housing completions data provided in the Council's annual Housing Monitor shows that the Policy requirement of "at least 2,400" homes was already exceeded by 31 March 2023, when 2,533 net new homes had been delivered in Horley urban area.
- 2.209 Horley North East and North West urban extensions were allocated in the 2005 Borough local plan. Horley North East sector, now known as "The Acres", was completed in 2015 and includes approximately 710 homes, along with a small local centre of six units, which was designated a "Local Centre" in the 2019 DMP, and adjoins a new primary school and care home.
- 2.210 Horley North West sector, now known as "Westvale Park" took some time to get all permissions and consents needed and to start delivering housing. Building out its 1,509 homes started in 2015, with a completion rate averaging about 150 a year. The North West sector is now nearing completion of its housebuilding, with 1,269 new homes having been completed by 31 March 2023. The new homes are expected to be completed by 2025/26, although the timing of completion of the final homes on the site is depended on the delivery of the local centre.
- 2.211 The DMP includes three Horley town centre site allocations for housing and mixed uses, with total housing capacity of approximately 95 additional homes alongside other town centre uses. There are also a further two urban allocations totally approximately 65 homes, two urban opportunity sites identified which can provide approximately 55 additional homes.
- 2.212 The Development Management Plan (DMP) 2019 also allocates two small sustainable urban extensions to the north west of Horley town, and one to the south east, which together will deliver approximately 190 additional homes when they are needed under the Council's urban-first spatial development strategy, only once the urban allocations and windfalls are predicted to provide insufficient delivery.
- 2.213 This number of homes on urban extension sites is within the "up to 200" included for this area in Policy CS8 (Area 3). These DMP site allocations are limited, as planned by Policy CS8 (Area 3), given the considerable size of Horley North East and North West sectors' contributions to the local housing market in this area.
- 2.214 On adoption of the Development Management Plan (DMP) in 2019, the retail floorspace requirement for Area 3 was reduced, so that since late September 2019, it has been approximately 800sqm of comparison retail floorspace, with no significant quantitative need for convenience retail floorspace.
- 2.215 These updated requirements are set out in DMP Tables 4, 8 and 10 (see paragraphs 123 and 124 of the DMP Inspector's Report of 9 July 2019 which can be accessed using this weblink). Since April 2012, there has been an overall net loss of approximately 1,269sqm of retail floorspace (which includes the gain of 905sqm and loss of 2,174sqm). Over 70% of the gain in retail floorspace in Area 3 has been in Horley Town Centre, which was the location of some 65% of the areas' retail floorspace losses.

- 2.216 As outlined in Policy CS8 (Area3), the area accommodates two distinct employment areas: Salfords industrial area, which is mostly light industrial and warehousing space; and Horley industrial estates, which provide smaller units with a wider range of employment uses. Salfords Industrial Estate is designated as a “Principal Employment Area” in the DMP, while the DMP designates Balcombe Road Industrial Area (consisting of Bridge Industrial Estate and Gatwick Metro Centre) as a “Local Employment Area”.
- 2.217 Over the plan period to date, Area 3 has seen a considerable increase in B8 storage / warehousing / logistics floorspace (a net gain of 11,303 to end of March 2023, consisting of gains totalling 17,046 and losses of 5,743). Despite total gains in office floorspace of 1,361sqm and in general industrial (Use Class B2) floorspace of 696sqm, greater losses of floorspace in those uses resulted in net reductions for both uses, of 9,955sqm of office and 215sqm for general industrial uses.
- 2.218 As summarised in the review of Policy CS5 above, a strategic employment development site is allocated by DMP 2019 Policy HOR9, to the south of Horley town. This site allocation requires a comprehensive development to include a new public open space and other complementary uses.
- 2.219 Infrastructure within Horley urban area is planned and co-ordinated through Horley Masterplan policies within the 2005 Borough local plan, which allocated Horley North East and West sectors, and identified the infrastructure needed to support these sizeable urban extensions, and in the 2006 “Horley Infrastructure Provision SPD”.
- 2.220 The new roads to access the North East and North West Horley sectors have been completed, and the bus service infrastructure delivered (funded by the developers and SCC). Flood mitigation infrastructure, play space and play facilities, allotments, and a new neighbourhood centre have been provided as required by the outline and detailed planning permissions and their related planning obligations.
- 2.221 Work towards delivering a new town park for Horley and related recreation and outdoor sporting facilities are currently in progress. The delivery of a Riverside Green Chain is also still in progress, involving a variety of land owners.
- 2.222 A new neighbourhood centre in the North West sector Westvale development provides shops and community services, whilst the North East sector The Ares includes a new Local Centre with 6 units providing shops and services, and a mixed state primary school with nursery (ages 3-11), Trinity Oaks, which opened in 2014.
- 2.223 Oakwood Secondary School, Balcombe Road, Horley, is a co-educational community school for pupils aged 11 to 16 serving Horley. The school was expanded in 2019/20 from 8 to 10 Forms of Entry (FE) in 2018 and 2019, with the building works receiving Community Infrastructure Levy (CIL) funding from RBBC towards the project.
- 2.224 The overall conclusion for Policy CS8 is that it is effective in directing development and infrastructure to the planned locations within each area of Policy CS8 as required by the [CS Monitoring Framework](#).

Policy CS8 (Area 3): Conclusion

- 2.225 The Council updated the retail requirement of this policy through the adoption in Sept 2019 of the DMP Tables 4, 8 and 12. No other modifications or updates to this policy are needed.

Policy CS9: Gatwick Airport

2.226 Policy CS9 provides the Council's strategic position on, and approach to Gatwick Airport, supporting the development of Gatwick Airport, within the existing airport boundary and existing legal limits, including facilities that support the safe and efficient operation of the airport.

Conformity with national policy and guidance

2.227 Policy CS9 is consistent with national policy as set out in the NPPF December 2023, in particular with paragraph 110 (e) which sets out that planning policies should provide for any large scale transport facilities (including airports) and wider development required to support their operation, expansion and economic contribution (taking account of "relevant national policy statements" and whether the development is a nationally significant infrastructure project).

2.228 Relevant national infrastructure policy statements include the Department for Transport's (DfT's) 'Airports National Policy Statement: New Runway Capacity and Infrastructure at Airports in the South-East of England' June 2018. This Airport National Policy Statement (ANPS) identifies (at paragraph 2.11) that Heathrow Airport is the busiest two-runway airport in the world, and Gatwick Airport is the world's busiest single runway airport. It also identifies that the Government's preferred scheme for additional capacity in the South East to maintain the UK's position as Europe's most important aviation hub is through a new Northwest Runway at Heathrow Airport, rather than through an extended Northern Runway at Heathrow, or a Second Runway at Gatwick Airport, which were also considered in that ANPS. Covering the period to 2030, it provides the primary policy document for decision making on development consent applications for a Northwest Runway at Heathrow Airport, and will be an important consideration in respect of such an application (paragraph 1.41).

2.229 The DfT's 2017 Aviation Strategy 'Beyond the Horizon: The Future of Aviation' confirms that the Government supports airports making best use of their existing runways, including in the South East, subject to environmental issues being addressed. This includes increasing either passenger or air traffic movement caps to allow them to make best use of existing runways.

2.230 'The UK's Sixth Carbon Budget' 2021, introduced a statutory cap on aviation emissions for the first time through the DfT's 'Jet Zero Strategy: Delivering net zero aviation by 2050' (July 2022), which sets ambitious targets for achieving zero emissions from the aviation sector by 2040 for internal flights and 2050 for external flights.

2.231 Policy CS9 is considered to be broadly consistent with Government policy on both planning and aviation, in that it supports development at the airport within its existing boundary.

Monitoring, local circumstances, and evidence

2.232 Gatwick Airport Limited (GAL) published a draft Masterplan (2019) which included plans to extend and bring into permanent use its Northern Runway, currently used as an emergency/ back up runway.

2.233 In 2021, GAL undertook a Preliminary Environmental Impact Report (PEIR) consultation,

a key stage in the Development Consent Order process. GAL maintains that under current legislation it can continue to optimise its operations but that the Development Consent Order is required to extend the Northern Runway and related infrastructure. The PEIR revealed that even without the Northern Runway proposals, Gatwick could significantly increase its operations from the pre covid number of passengers in 2019 of 46.2m (pre-covid) to 62.7m in 2047. With the Northern Runway in 2029, passenger numbers for Gatwick could increase to 80.2m in 2047 assuming air traffic movements (“atms”) were increased to between 55 and 69 atms per hour.

- 2.234 In 2021 the Government set its 6th carbon budget policy which sets the legal limit for UK net emissions of greenhouse gases for the years 2033-37, which includes aviation emissions. Aviation remains one of the most carbon-intensive forms of transport and one of the most difficult to decarbonise. Whereas international aviation accounted for around 8% of UK CO2 equivalent emissions, by 2050 aviation could be the largest contributor to UK greenhouses gas emissions, particularly if demand continues to grow and is provided for.
- 2.235 Heathrow’s plans for the Northwest runway (the Government’s preferred option to meet future need), have recently been re-started following a long pause on the project.
- 2.236 On 6th July 2023 Gatwick Airport Limited (GAL) submitted its Northern Runway Development Consent Order (DCO) application to the Planning Inspectorate which was subsequently accepted by the Examining Authority on 3rd August 2023. The DCO Examination started in spring 2024.
- 2.237 Policy CS9 does not preclude additional capacity within Gatwick Airport, and whilst the outcome of the DCO submission is still unknown, a clearer picture of the growth impacts is emerging. The Council will continue to monitor progress and to make representations to the Gatwick Northern Runway DCO, but the current position does not require Policy CS9 to be modified at this time. It is unlikely that a decision will be reached on the submitted DCO by the Examining Authority until late 2024 at the earliest.

Policy CS9: Conclusion

- 2.238 No modification or update to Policy CS9 is required.

Policy CS10: Sustainable development

- 2.239 This policy sets out a number of high level requirements which development will be expected to meet in order to achieve sustainable development.
- 2.240 This includes making efficient use of land and giving priority to brownfield land, being developed at appropriate densities, protecting and enhancing green fabric, and respecting ecology and heritage.
- 2.241 The policy also requires development to minimise use of natural resources, minimise pollution and be designed to both adapt to climate change and also minimise flood risk.

Conformity with national policy and guidance

- 2.242 All elements of this strategic sustainable development policy are considered to be consistent with current national policy, including relevant sections of the NPPF. The

- requirement to **make efficient use of land**, giving priority to previously developed land and buildings within built up areas reflects NPPF 2023 Chapter 11 “Making effective use of land”.
- 2.243 The requirement for new development to be at an “appropriate density” taking account of the character of the locality and accessibility and services, is consistent with current national policy, in particular, NPPF 2023 paragraph 128 (c) and (d).
- 2.244 Whilst national density policy has been strengthened since 2012, when local authorities were required only to “*set out their own approach to housing density to reflect local circumstances*”, the more prescriptive national policy on densities, includes a requirement for local plan policies to set “*minimum density standards for .. town centres and other locations well serviced by public transport*”. As CS10 is strategic policy, it is not inconsistent with more recent national policy.
- 2.245 Policy CS10 addresses climate change mitigation, transition to low-carbon, flood-risk, water-supply, and adaptation to climate change issues included in the NPPF 2023 (paragraphs 157 to 160).
- 2.246 The strategic climate change adaptation requirements of Policy CS10 are consistent with NPPF paragraphs 158-164. The strategic plan-making requirements for flooding risk minimisation broadly follow the provisions of NPPF Chapter 14 and Annex 3 including specifically in respect of the application of Sequential and Exceptions tests where necessary (paragraphs 165-175).
- 2.247 The principle of using the sequential risk based approach (and Exception Test where relevant) for selecting sites for allocation in development plans informed the development of Policy CS10, and remains a key element of local plan making in current national planning policy. This continues to include consideration of the impacts of climate change, as it did in 2012.
- 2.248 NPPF paragraphs 167,168 and 169 require all plans to apply a sequential, risk-based approach to the location of development to avoid where possible, flood risk to people and property. This process was followed through preparation of strategic [Flood Risk Assessments to inform both the Core Strategy’s strategic locations for development](#), and the [Development Management Plan’s Sequential Test and Exceptions Tests](#) that informed the site allocation policies, all of which can be viewed using the weblinks provided.
- 2.249 The emphasis on consideration of Flood Risk vulnerability for development sites was increased by moving the Flood Risk Vulnerability from [national Planning Practice Guidance](#) (the PPG) to the NPPF as a new Annex 3 on “Flood risk vulnerability classification”, from the July 2021 NPPF version.
- 2.250 Policy CS10 is consistent with the requirements of NPPF paragraph 8(c) regarding environmental sustainable development; paragraph 8(b) regarding accessible services and open space; paragraph 20(d) regarding the protection and enhancement of the natural environment; all the requirements of paragraph 96 [see CS10(3) and (4)], and NPPF paragraph 97(a) and (b) [see CS10(3) – (6)] regarding wellbeing; and NPPF paragraph 102 regarding access to open space and recreation. Policy CS10 (3 and 4) also broadly addresses sustainable transport (regarding requirements of NPPF paragraph 108) .
- 2.251 Policy CS10 also addresses some strategic aspects of the design requirements set out

in NPPF Dec 2023, including paragraph 135 in regard to visual attractiveness, green space, character, history, sense of place, and safe / accessible environments.

- 2.252 DMP policies reflect locally the national policy requirements set out in the NPPF Dec 2023 regarding the cumulative impacts of flooding, and remediation.

Monitoring, local circumstances, and evidence

- 2.253 The Council reports its monitoring against Policy CS10 indicators annually in its 'Environment and Sustainability Monitor', the most recent one being published in December 2023, reporting on the year ending 31 March 2023. In accordance with the CS Monitoring Framework's target, over the plan period to date, there have been no developments approved contrary to the Environment Agency's advice.
- 2.254 Since 2012 (the start of plan period), less than 5% of the new homes built in the Borough have been on land at risk of flooding, indicating that strategic policy is directing development to land at lowest risk of flooding and that meeting the local plan housing requirement has not required approving developments at risk of flooding. Where development has occurred on land at risk of flooding, in the majority of cases it has been through conversions or as part of regeneration schemes in Redhill town centre.
- 2.255 The proportion of development of previously developed land (also referred to as "brownfield land") has consistently exceeded the [Core Strategy Monitoring Framework's](#) target of at least 50% of new homes over the plan period (currently at 58.5%), reflecting the priority that Policy CS10(1) gives to previously developed land.
- 2.256 Where development has been built on greenfield land, the vast majority has been at the two allocated new neighbourhoods at Horley North East and North West. The plan-led approach to promoting use of brownfield land in urban areas is therefore proving successful.
- 2.257 In order to continue to deliver housing on previously developed land, in accordance with the Core Strategy 'urban areas first approach' the Council will continue to be proactive in identifying additional previously developed sites through the annual Brownfield Land Register (BLR), working proactively with landowners and site promoters to bring them to development.
- 2.258 In monitoring against Policy CS10(1), since the start of the plan period (2012), the Core Strategy has been effective in delivering sustainable development, which it continues to do. The proportion of homes and non-residential development built on previously developed land (PDL) has exceeded the targets set out in the [Core Strategy Monitoring Framework](#) for Policy CS10 Sustainable Development (50% and 90% respectively).

Policy CS10: Conclusion

- 2.259 No modification or update to Policy CS10 is required.

Policy CS11: Sustainable construction

- 2.260 This policy sets out the sustainable construction standards which new development will be required to meet, specifically Code Level 4 for residential and BREEAM 'Very Good' for non-residential.

- 2.261 The policy also includes provisions that the Council will work with developers and other partners to promote development of decentralised and renewable or low carbon energy and sets out how this will be applied.

Conformity with national policy and guidance

- 2.262 It is considered that the provisions of Policy CS11 are broadly consistent with current national policy. The NPPF Dec 2023 (paragraph 157) seeks to ensure that new development is sustainable, and particularly, helps to reduce greenhouse gas emissions through its location, orientation and design.
- 2.263 Policy CS11(2) is consistent with national policy included at paragraph 160(c) of the NPPF December 2023, which encourages local plans to support a transition to low carbon energy and heat, and specifically to maximise opportunities for developments to draw their energy supply from decentralised, renewable or low carbon energy.
- 2.264 The environmental sustainability elements in the NPPF December 2023 at paragraphs 8, 20(d), and 157, 158 and 159 with regard to the prudent use of resources, mitigation of climate change, and transition to low carbon are reflected in Policy CS11 and considered elsewhere in the Core Strategy including Policies CS1 and CS10.
- 2.265 Policy CS11(1) includes the requirement for new housing to as a minimum to comply with the Code for Sustainable Homes (which was abolished nationally in 2015), or future nationally described standards. Elements of the Code for Sustainable Homes have been integrated into the amended Building Regulations including Part L which covers energy performance in new and existing buildings. DMP Policy CCF1, adopted in 2019 reflects this change.

Monitoring, local circumstances, and evidence

- 2.266 Whilst the Code for Sustainable Homes has been abolished since adoption of the Core Strategy in 2014, given the flexibility built into Policy CS11, it does not render the policy out of date.
- 2.267 The requirement for BREEAM 'Very Good' is applied through the decision-taking process on applications and secured by condition where appropriate, including through additional supporting guidance provided in the Council's guide to sustainable development contained in its [Climate Change and Sustainable Development SPD 2021](#).

Policy CS11: Conclusion

- 2.268 No modification or update to Policy CS11 is required.

Policy CS12: Infrastructure delivery

- 2.269 This policy sets out the broad approach to the delivery of infrastructure to support new development. Specifically, the policy requires that infrastructure should be provided ahead of, or alongside new development.
- 2.270 The policy encourages proposals that would improve community and leisure facilities and seeks to protect existing valued services, facilities and open spaces (subject to

criteria).

Conformity with national policy and guidance

- 2.271 The NPPF Dec 2023 makes clear (at paragraph 8) that one of the roles of the planning system is to identify and coordinate the provision of infrastructure.
- 2.272 National policy (NPPF paragraph 20) specifies the requirement for strategic policies to set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and to make sufficient provision for infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); as well as community facilities (such as health, education and cultural infrastructure).
- 2.273 Strategic policies should set out a strategy to deliver, and make sufficient provision for, the provision of infrastructure. Core Strategy Policy CS12 serves precisely this purpose and is clearly in consistent with national policy.
- 2.274 Policy CS12 also seeks to encourage proposals that enhance the provision of community and leisure facilities in the Borough, including through co-location. In doing so, it is consistent with the aims of paragraph 88 of the Framework (specific to diversifying rural areas) as well as the wider provision of paragraph 97 in relation to promoting healthy and safe communities. Paragraph 97 specifically seeks to ensure that plans have a positive impact on the provision of social, recreational and cultural facilities, including through use of shared spaces which is consistent with Policy CS12(3b).
- 2.275 The Core Strategy Policy CS12 conforms with the Framework in that it seeks to guard against loss of leisure and community facilities, except in specific circumstances; these circumstances broadly reflect NPPF paragraph 97(c) in relation to recreation / community facilities and NPPF paragraph 103 in relation to open spaces.

Monitoring, local circumstances, and evidence

- 2.276 In accordance with the Core Strategy Policy CS12 (1), the Council works towards securing contributions from new developments towards the infrastructure required to meet the needs created by the new development. The Council has adopted the Community Infrastructure Levy (CIL), which was one of the key implementation and delivery mechanisms identified. Charging commenced in 2016 and to date (as of mid-November 2023), over £15.5m has been collected, significantly exceeding original forecasts.
- 2.277 The Council publishes an annual Infrastructure Funding Statement (IFS) in December each year, which provides details of the amount of CIL collected and spent each year. The latest published IFS, December 2023, shows the diverse nature of the numerous infrastructure projects delivered each year, from the strategic infrastructure project of the Blue Light Hub, Banstead, incorporating a new Ambulance Make Ready Centre, to a number of small local projects, such as contribution to several “Level Up” laptop refurbishment programmes across the Borough’s schools, funding of replacement bus shelters, and contributing to the replacement of South Park Football Club grass pitch.
- 2.278 Overall, during the plan period, significant positive progress has been made in delivering

key infrastructure priorities. In Area 1, the new leisure and community facilities at Preston have been delivered and the two listed transport improvement projects are in progress. In Area 2, the primary school expansions have been completed (and planning applications for further capacity increases are being considered). The Merstham community hub is complete, as are the improvements to Earlswood Depot. The Balanced Network highway scheme in Redhill Town Centre has been completed. In area 3: Horley, the remaining infrastructure works are progressing in tandem with the delivery of the North West Sector. One new primary school has already been completed in the North East Sector and planning consent granted for the second in the North West Sector. The new leisure centre has been completed.

- 2.279 Working with infrastructure providers in the area, the Council has produced a list of key infrastructure projects required to support the planned development in the Borough to 2027. The list can be found in the Annex 6 of the DMP. The Council's latest published Annual Monitoring Report (AMR) from December 2022 shows a number of key infrastructure projects currently being delivered, including, among others: Three Arch Road junction improvements; Greater Redhill Sustainable Transport Package Phase 2; New 2FE Primary Free School at North West Sector; and Horley and Burstow Stream Flood Alleviation Scheme.
- 2.280 The summary above demonstrates that positive progress is made in bringing forward infrastructure and, crucially, that none of the key infrastructure priorities have proved undeliverable.

Policy CS12: Conclusion

- 2.281 No modification or update to Policy CS12 is required.

Policy CS13: Housing delivery

- 2.282 Policy CS13 establishes the overall housing requirement for the Borough. It plans for the delivery of at least 6,900 homes between 2012 and 2027, equivalent to an annual average of 460 homes per annum.
- 2.283 To achieve this, the policy sets out that at least 5,800 homes will be delivered within existing urban areas, with the remainder to be provided in urban extensions in accordance with policy CS6.
- 2.284 The policy also sets out that sites for sustainable urban extensions 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).

Conformity with national policy and guidance

- 2.285 Consistent with the requirements of paragraph 67 of the Framework, Policy CS13 establishes the housing requirement figure for the Borough (of at least 6,900 homes between 2012 and 2027, equating to an average annual provision of 460 homes per annum).
- 2.286 This local plan housing requirement was examined and found sound by the Core Strategy Inspector, against an objectively assessed need of "between about 600 and

640 dwellings” ([CS IR paragraph 29](#)), just over half of which would be required each year to accommodate natural change with the remainder to provide for net in-migration (IR paragraphs 27 and 29).

2.287 Since the adoption of the Core Strategy in July 2014, revisions to the NPPF have altered the basis for calculation of local housing needs, establishing a national standard method, **introduced in 2018**, the outcome of which NPPF Dec 2023 is clear is an advisory starting point for establishing a housing requirement for the area.

2.288 In accordance with current national planning policy, the standard method is currently underpinned by the **2014 national household projections**, with an uplift to take account of local housing affordability.

2.289 **The standard method also includes caps** that depend upon the status of the strategic policies for housing, applied as follows:

- a) Where policies were adopted within the past five years (at the point of making the calculation) or **where they have been reviewed and found not to require updating**, the standard method is calculated based on a **40% cap above the plan figure**.

Under this scenario, the local housing need for Reigate & Banstead would currently equate to **644 homes per annum** (460 plus 184), capped at 40% above the plan figure because the Core Strategy has been reviewed and found not to need updating within the last 5 years. This figure is clearly very closely aligned to the range of local housing need based on “the full, objectively assessed need for housing over the plan period” that were identified by the Core Strategy Inspector ([CS IR 2014, paragraph 29](#)) of “an annual average of between about 600 and 640.”

- b) In circumstances where the strategic policies are more than five years old and have not been subject to review (or have been concluded to require updating), the standard methodology applies differently.

If scenario b) was relevant for Reigate & Banstead, which it is not currently, this would produce a local housing need for the Borough of 1,123 homes per annum.

2.290 The national PPG advises that “*Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method. This is to ensure that all housing need is planned for as quickly as reasonably possible.*” As “significantly” in this context is not defined, it is for the Council to decide whether the Borough’s local housing need has changed significantly.

2.291 It is important to note the evidence that was available and considered by the Core Strategy Inspector, and the range of potential local housing needs this suggested over the plan period. Also, as the NPPF December 2023 makes explicit, “*the outcome of standard method is an advisory starting-point for establishing a housing requirement for the area.*”

2.292 Whilst the CS Inspector concluded that “**the full, objectively assessed need for housing over the plan period is an annual average of between about 600 and 640 dwellings**” ([CS IR 2014 paragraph 29](#)), it is important to note that in his report the

Inspector also acknowledged (paragraph 30) that “*it must be appreciated that **this conclusion is based on limited up-to-date evidence and interim projections that only go to 2021***”. The evidence available to the Inspector at that time included the 2008-based projections (which informed the Council’s 2012 SHMA) which forecast a higher growth of 850 dpa, whilst the 2011 interim population projections that extended to 2021, indicated household growth of 933 per annum over the 10 years 2011-2021 (IR paragraph 21). Extrapolating the 2011 interim projections over the whole 15 year plan period, and making allowance for a slower rate of household growth in the last 5 years of the plan period, the 2011-based projections suggested slightly higher growth than the 2008-based projections.

- 2.293 At the time, the CS Inspector confirmed that the 2011 Census provided the most accurate demographic data for the borough and a more up-to-date benchmark for projections than those available for the 2008 SHMA and its 2012 update. Interim projections were available for the 2011-2021 period only; and indicated household growth of 933 per annum over that decade. Evidence available to the CS Inspector at the time therefore indicated local housing need in the order of 850 to 933 homes average per annum over the plan period ([IR paragraphs 20 and 21 of the IR 2014](#)).
- 2.294 Comparing the range of local housing need evidence over the plan period considered by the Core Strategy Inspector, the Council considers that the local housing need for the Borough produced using the national standard method (currently capped at **644** because the Core Strategy has been reviewed and found not to need updating within the last 5 years), has **not changed significantly** from the range of local housing need identified at the time of the Core Strategy’s adoption in 2014 (**600 to 640**). Even if the uncapped figure of **1,123** were to be used, it is still not significantly different from the **933** anticipated in the later years of the plan period.
- 2.295 As the Core Strategy Inspector considered (Inspector’s Report paragraph 28), changes to average household sizes impact on local housing needs in the Borough, and as the 2011 Census showed, average household sizes in the Borough increased between 2001 and 2011.
- 2.296 The Council had assumed that over the plan period (2012 to 2027), household formation would adjust and the Borough’s average household size would resume its longer term trend of reducing (as it had before 2011) from 2.42 in 2011 census to either 2.38 or 2.36 by 2027 (a reduction in size of at least 0.04). In the absence of any firm evidence, the Inspector used these two alternative reductions in average household size as a range of housing need (IR paragraph 28).
- 2.297 Since that time however, the 2021 census results have shown that the average household size in the Borough actually increased between 2011 and 2021, from 2.42 to 2.52 (an increase of 0.1). The economic and other uncertainties of the past decade, along with generally relatively high house prices in the Borough, have constrained household formation and therefore the local housing need in the later part of the Core Strategy plan period.
- 2.298 Additionally, the CS Inspector (IR paragraph 23) also acknowledged that the recent projections are trend-based, generally over the past 5 years, and the interim projections available at that time did not take into account that, under the national growth point (NGP) initiative, housing growth in Reigate & Banstead was expected to be “front-loaded” at the start of the South East Plan period, tailing off in the latter part of the plan

period from its high number of dwelling completions in 2006-2010.

- 2.299 As the CS Inspector summarised ([at paragraph 23 of the CS IR](#)), the 2011-based projection showed population growth for R&B Borough of about 16% in the period 2010 to 2021. Publication of the 2021 census results shows that over this period, population growth in the Borough was actually far lower, at 9.5% (2011-2021), although still the highest of all Surreys districts and boroughs.
- 2.300 It is also important to note that the NPPF (paragraph 11b) also requires strategic policies to provide for these figures as a minimum unless either:
- i. the application of the policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area (which are specified in footnote 7 as including land designated as Green Belt, An Area of Outstanding Natural Beauty, and areas at risk of flooding) ; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 2.301 National Policy continues to recognise that local plan housing requirements should respond to local constraints, as was the case when the Core Strategy was examined.
- 2.302 The NPPF Dec 2023, in a similar manner to the 2012 NPPF under which the CS was examined, clearly identifies (paragraph 11b and footnote 7) the need to consider the identified local housing need in light of certain particular protected areas or assets of particular importance which may provide “ a strong reason for restricting the overall scale, type or distribution of development in the plan area”. The Council’s strategic policy housing requirement therefore took into consideration these areas and assets in formulating its suitable and sustainable housing requirement in Policy CS13.
- 2.303 In this respect, the Core Strategy Inspector clearly acknowledged and accepted that meeting full housing needs (of up to 640 per annum at that time), would not be sustainable or consistent with the Framework. Specifically, he concludes (at paragraph 68 of his report) that *“A shortfall of over 2,000 dwellings against the full objectively assessed need would remain, but given the environmental and other constraints across the borough, it is not possible to meet this shortfall sustainably without conflict with other aims of the Framework.”* The Sustainability Appraisal that accompanied the Core Strategy considered the relative sustainability of a range of housing levels and concluded that the most sustainable level of growth would be between 420 and 500 homes per year, and found demonstrable negative impacts to a range of sustainability objectives for scales of growth at 625 per annum and above (up to 980 per annum).
- 2.304 The Core Strategy Inspector identified a number of large-scale and localised constraints, including Green Belt (paragraph 46-56 of the Inspector’s Report) and flood risk (particularly paragraphs 42-43) at one end of the spectrum, and localised constraints of ancient woodland (paragraph 54) which justified why the overall housing needs could not be met. All of these protected areas and assets of particular importance for the purposes of footnote 7 of the NPPF Dec 2023 remain as constraints to housing capacity, and therefore housing requirement, in the Borough. The CS Inspector acknowledged this in agreeing a local plan housing requirement which was considerably lower than the local housing need.

- 2.305 These constraints clearly continue to influence potential future housing capacity in the Borough in the same way, if not more, than they did in the Core Strategy examination. , In some instances, the level of protection afforded by the 2023 NPPF has arguably strengthened, or at least clarified in its operation. For example, in respect of Green Belt, the NPPF Dec 2023 (paragraph 146) now includes a specific provision requiring that *“before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries”, a “strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its need for development”*. .
- 2.306 Consideration of the current position, evidence and local circumstances on the main constraints identified by the Inspector is set out below.
- 2.307 As described in the commentary under Policy CS3 above, the Core Strategy Inspector specifically acknowledged the **significant constraint that the Green Belt imposes** on the Borough, and the limited sustainable opportunities for accommodating development within it. Taking account of the strategic borough-wide Green Belt assessment undertaken during the second stage in the preparation of the Core Strategy, the Inspector concluded that the evidence *“revealed that sustainable opportunities which do not undermine the aim and purposes of the Green Belt are very limited”* (CS IR paragraph 51).
- 2.308 Additionally, the CS Inspector also recognised the importance of the Green Belt in the Borough, highlighting that *“most Green Belt in the north of the Borough...has a vital strategic role and function as a ‘green lung’ for the conurbation”* and that the rest of the Green Belt *“is fragmented in parts and the total area is not huge, especially when compared to other similar authorities nearby”*. It is for these reasons that the Inspector concludes (CS IR paragraph 53) that *“at a strategic level, only...two broad locations comply fully with the criteria in the Framework and exhibit the exceptional circumstances necessary if Green Belt boundaries are to be altered”*.
- 2.309 These two broad locations were taken forward and examined further through the detailed Green Belt review carried out to accompany the Development Management Plan. Those specific land parcels considered to be sustainable and to exhibit exceptional circumstances were removed from the Green Belt and have been allocated for development through the DMP.
- 2.310 Furthermore, detailed Green Belt appraisal of a wide range of other potential locations for longer-term growth through the DMP Safeguarded Land report (SD34) again showed very limited options for future growth that would not involve the development of land that was identified as “high” performing against one or more purposes of the Green Belt. With this evidence in mind, it is clear that significant additional opportunities to facilitate a much greater level of housing could not be identified within the Green Belt without seriously undermining the overall purposes and integrity of it.
- 2.311 With respect to other development opportunities **outside of the urban area and the Green Belt**, the Core Strategy Inspector specifically considered the ability of countryside around Horley to accommodate additional growth in the period to 2027. He identified a number of constraints on growth within that area, including that *“significant areas of the rural surrounds of Horley are in flood zones 2 and 3 and therefore at risk of flooding”*.
- 2.312 Flood zone mapping from both the EA and in the Council’s latest [Strategic Flood Risk Assessment \(2017\)](#), demonstrates that the extent of flooding around Horley has not changed significantly so as to materially alter the extent of land which is within Flood

Zone 1.

- 2.313 The extent of land affected by aircraft noise contours is also not significantly changed between the Core Strategy and current position. This can be observed from the Gatwick Airport Noise Exposure contours publications (available from the [Department for Transport's website](#) until 2015 and [Gatwick Airport's website](#) from 2016 onwards). To demonstrate this point, the total area covered by the 57dB contour from Gatwick in 2012 was 41.2km² (based on summer day standard mode), compared to 38.7km² in 2019 on the same basis (2019 was the last year of a standard airport operation, prior to the Covid-19 pandemic of 2020/21 and its unprecedented impact on aircraft movement and correspondingly large decreases in contour areas in 2020 and 2021). The severity and extent of this constraint has therefore not changed significantly compared to that which was before the CS Inspector.
- 2.314 The CS Inspector also identified (CS IR paragraph 44) that the desirability and capacity of Horley to absorb more growth at that time was a limiting factor, noting on-going development delivery. The long-standing allocations that the Inspector identified in his report are still being developed, particularly the North West Sector, which is approximately three-quarters complete and is expected to be completed around 2026. For these reasons, there is no evidence to demonstrate that significantly more land is likely to be identified to facilitate a substantially greater local plan housing requirement.
- 2.315 Policy CS13 identifies that the approximately 1,100 new homes within the local plan housing requirement that cannot be accommodated within the existing urban areas should be accommodated within the broad areas of search for sustainable urban extensions set out in Policy CS6. Paragraph 6.2.8 of Policy CS6 identified potential indicative capacities at "sustainable urban extensions"; up to 500-700 homes in East of Redhill and East of Merstham, up to 500-700 homes to the South and South West of Reigate, and up to 200 homes adjoining Horley (totalling 1,200 to 1,600).
- 2.316 Through the detailed evidence that informed the preparation of the DMP, including sustainable urban extension technical assessments, sustainability appraisal, constraints assessments and Green Belt review, it was demonstrated that development constraints within the Borough limited the potential sustainable urban extensions within those areas to approximately 465 units East of Redhill and Merstham, in 335 homes in South West Reigate and around 190 new homes as an extension to Horley.
- 2.317 These shortfalls demonstrate that the environmental and policy constraints in the Borough indicate that identifying additional and sustainable capacity to support a higher housing requirement figure is unlikely. However, they do not prejudice delivery of CS13, as the urban extension figures were intended as an upper limit (see paragraph 64 of the [Core Strategy Inspector's Report](#)), and there has been a positive over-delivery to date from urban allocated and windfall sites against the minimum housing requirement.
- 2.318 Mindful of the conclusions of the Core Strategy Inspector with respect to the constrained nature of the Borough, together with the more recent evidence which supports that there has been no significant change in the extent or importance of the key environmental and policy constraints in the Borough which he identified, it is clear that the adopted housing requirement in CS13 continues to strike an appropriate balance between meeting the identified local housing needs and the protection of the Borough and its environment from unsustainable development.
- 2.319 The local housing need identified by the new national standard method (currently 644) is

beyond the level which the Core Strategy Inspector found to be capable of being sustainably delivered in the Borough given its considerable constraints and capacity.

- 2.320 Policy CS13 includes provisions (at paragraph 4) to manage the release of sustainable urban extensions “when such action is necessary to maintain a five year supply”.
- 2.321 During the Core Strategy’s Examination Hearings, this approach to managing the release of sustainable urban extension sites was debated extensively in relation to whether it conflicted with the Government’s ambition “to boost significantly the supply of housing”, a position argued by many house-builders representatives. Subsequently, in 2019, the Inspector examining the DMP noted (IR paragraphs, 132, 136 and 139) that the DMP Housing trajectory at DMP Annex 7, makes provision for 8,030 homes, so exceeding the housing requirement by 1,130 (around 16%) a figure which she considered to be realistic. She concluded therefore that *“the approach to the supply and delivery of housing is justified, positively prepared, effective, deliverable and consistent with national policy and the Core Strategy.”*
- 2.322 The Core Strategy Inspector clearly summarised that debate in his Inspector’s Report (IR), where he concluded that “an approach which allows greenfield sites only when necessary to maintain a five year supply is sound” in part to support the use of “urban areas first” which lies at the heart of the Core Strategy (IR paragraph 71). In finding this policy approach and wording to be “sound”, the Inspector agreed that they are consistent with national policy.
- 2.323 The current NPPF (Dec 2023) places an even stronger focus on making “as much use as possible of previously developed or ‘brownfield’ land” than its 2012 predecessor. There is now a whole Chapter of the Framework (11 – Making efficient use of land) on this subject and paragraphs 123 and 124 are particularly pertinent in respect of the effective use of previously developed or ‘brownfield land’. In particular there has been a change in emphasis from the 2012 NPPF which sought to “encourage” effective use of land by re-using previously development / brownfield land not of high environmental value, including potentially setting a local target for use of brownfield land (paragraph 111) to the NPPF Dec 2023 (paragraph 124c) which now requires planning policies to *“give substantial weight to the value of using suitable brownfield land within settlements for homes.”*
- 2.324 This is especially so in areas constrained by Green Belt, where the full examination of all other reasonable options for using previously developed / brownfield land and maximising densities in town centres and other sustainable locations is now a requirement to demonstrate before a local planning authority can conclude that exceptional circumstances exist to justify changes to Green Belt boundaries (paragraph 146 of the NPPF 2023).
- 2.325 It is therefore considered that the Policy CS13 approach of allowing for the release of urban extension sites only when needed to maintain a five-year supply is consistent with current national policy.

Monitoring, local circumstances, and evidence

- 2.326 As mentioned in paragraph 1.16 above, the Planning Practice Guidance (PPG) sets out a number of factors that can (but not exclusively) be considered when determining whether policies should be updated. One is change in local housing need (discussed in

detail above). However, other factors relevant to Policy CS13 in particular include the following:

- 2.327 Reigate & Banstead Borough's most recent **Housing Delivery Test (HDT) performance** is 168% (Dec 2023), reflecting the significant delivery above the local plan minimum housing requirement over the past rolling three-year period. As a result, there is no specific action or penalty required to be taken by the Council.
- 2.328 The Council is able to demonstrate a **five-year housing land supply** of deliverable sites for housing against its adopted local plan housing requirement.
- 2.329 The [2023 Housing Monitor](#) concludes that as at 1 April 2023, the current supply of deliverable sites (which includes a windfall allowance) against its adopted local plan housing requirement is equivalent to 7.80 years, thus significantly exceeding the 5-year requirement.
- 2.330 Since the Council adopted its Core Strategy in July 2014, it has consistently maintained a five-year land supply and there have been no appeals allowed based on successful challenges to this position since adoption of the Core Strategy. In a December 2021 appeal decision for 1 & 2 Rosebank Cottages, Cockshot Hill, Reigate (ref: APP/L3625/W/20/3257176), the Inspector confirmed (at paragraph 26) that *"It is not for me to go behind this decision (that the housing requirement did not need modification) which I note was not challenged in the courts"*. He also noted (at paragraph 30) that *"There is no substantive evidence before me to demonstrate that circumstances have changed in the interim, since the Core Strategy was adopted and then reviewed, such that a significantly higher figure would be achievable."*
- 2.331 Progress in delivering against the housing requirements established within the Core Strategy has therefore been very positive and it is clear that the strategy and policies within the CS are facilitating strong delivery.
- 2.332 It is important to note that the housing requirement included in Core Strategy Policy CS13 does not have an upper limit, and is expressed as "at least"; it therefore allows the number to be exceeded (as has clearly been the case already over the plan period) should sustainable opportunities for housing development arise.
- 2.333 The Council's delivery performance (at a mean annual average of 573 homes compared to the local plan requirement of at least 460 homes, an excess of 25%), demonstrates that it is responding positively to this provision to significantly boost delivery of housing consistent with national policy.
- 2.334 Up to date local evidence regarding realistic land availability is described above under conformity with national policy, which is considered to support the view that a housing requirement significantly above the 573 homes per annum currently being delivered within the context of Policy CS13 is not deliverable or sustainable within the constraints of the Borough.
- 2.335 The 2023 NPPF (paragraph 70) specifically requires plans to promote the development of a good mix of sites through the development plan, including a requirement for at least 10% of housing to be provided on sites of no larger than one hectare. Whilst Policy CS13 does not specifically make provision for this, it is a Strategic Policy rather than being part of a local plan containing site allocations. Monitoring evidence demonstrates that nonetheless, this has occurred consistently since the Core Strategy was adopted, supported by other policies in the plan (including CS6) which specifically encourages

sustainable urban developments and other sustainable windfall opportunities (consistent with NPPF paragraph 70 (d)).

- 2.336 Analysis of data from the Council's housing monitoring database shows that, since the beginning of the plan period, 61% of the gross new homes in the Borough have been delivered on sites of under one hectare, demonstrating considerable diversity in the mix of housing sites delivered in the Borough. Whilst this provision is not explicit within the policy, it would therefore be wholly disproportionate to review the policy to address this point given the naturally occurring performance and limited scope to increase this further. Where larger sites have come forward, such as the Horley North West Sector, these have been built out by a development consortium, again reflecting the national policy aimed at diversification (NPPF paragraph 70(e)).
- 2.337 Against the national policy NPPF Dec 2023 (paragraph 33) and guidance PPG (Paragraph Reference 61-062-20190315; Revision date: 15 03 2019) regarding local housing need in plan reviews, given the local housing needs that were identified at the time of the Core Strategy's examination for the plan period (2012 to 2027), the housing need number currently generated using the standard method, and the constraints to development present in the Borough, the Council considers that local housing need figure has not changed significantly to require an update to Policy CS13.
- 2.338 As discussed under policy CS9 above, Gatwick Airport Limited (GAL) published a draft Masterplan (2019) which included plans to extend and bring into permanent use its Northern Runway. In 2021, GAL undertook a [Preliminary Environmental Impact Report \(PEIR\) consultation](#). That report concluded that within the initial construction phase (2024 – 2029), the project would result in a non-significant, temporary, medium-term, negligible effect on housing. Growth at Gatwick cannot therefore be said to justify or necessitate a review to policy CS13 at this stage. However, this position should be reviewed as a part of the preparation of the new Local Plan for period from 2027, taking into consideration potential impacts of the growth at Gatwick post 2029. It is of note that whilst the Development Consent Order (DCO) for Gatwick's Northern runway has been submitted, the examination is scheduled to take place throughout much of 2024, and the decision is still many months away.

Policy CS13: Conclusion

- 2.339 Based on the assessment in particular relating to current national planning policy, guidance and to local evidence, monitoring and appeals, Policy CS13 does not require updating at the current time.

Policy CS14: Housing needs of the community

- 2.340 Policy CS14 sets out the overarching approach to delivering a range of housing types and tenures to meet the needs of local communities. It expects housing developments to contain an appropriate mix of dwelling sizes, taking account of evidence of local need and site characteristics.
- 2.341 The policy also specifically encourages the provision of specialist housing for older people and those with disabilities in sustainable locations.

Conformity with national policy and guidance

- 2.342 Policy CS14 sets an overarching strategic ambition to deliver a range of housing types and tenures, including an appropriate mix of dwelling sizes reflecting local needs and site characteristics.
- 2.343 These high-level requirements are consistent with the provisions of paragraph 63 of the Framework. Detailed mix requirements are set out in the adopted DMP policies, as provided for in the 'delivery / implementation' of Policy CS14.
- 2.344 Policy CS14 also seeks to encourage the provision of housing for the elderly or less mobile, again, consistent with paragraph 63 that identifies that older people and those with disabilities are specific groups who should be planned for. Detailed policies regarding accessible housing and allocations for the provision of housing for older people are included in the adopted Development Management Plan.

Monitoring, local circumstances, and evidence

- 2.345 Monitoring data shows that a wide variety of homes has been delivered within the Borough over the plan period to date. Core Strategy Policy CS14 requires housing developments to contain an appropriate mix of dwelling sizes (assessed by number of bedrooms) in accordance with assessments of housing need, site size and characteristics, and to avoid developments resulting in undue concentration of any one type that would cause and imbalance in communities.
- 2.346 The [2012 Strategic Housing Market Assessment \(SHMA\)](#) published February 2012, informed Core Strategy Policy CS14. In particular, Table 7-12 "Future Housing Delivery by Tenure" of the 2012 SHMA identified the following recommended size mix of homes (by bedrooms) as follows:
- 2.347 The SHMA 2012 identified need for market housing was for 60% of new homes to have 3 or more bedrooms, with 40% having less. The recommended mix for social rented housing was skewed towards a need for 1- and 2-bedroom homes (75%) with only 25% of 3- or more bedroom homes needed. Intermediate housing (such as Shared Ownership) needed only 15% as 3-bedrooms (no 4+ bedrooms), and 85% as 1- and 2-bedroomed homes.
- 2.348 Policy CS14 provides flexibility to respond to updated evidence of changing local housing needs in that it refers to the mix reflecting assessments of local need and does not prescribe targets. The Policy states that the Council will (2) "*Require housing developments to contain an appropriate mix of dwelling sizes in accordance with assessments of housing need, site size and characteristics.*" Paragraph 7.5.3 of the Policy Explanation advises that "planning policy will be informed by regular assessment and monitoring of the housing market through updates to the Strategic Housing Market Assessment and Council monitoring reports". This evidence was expected to form the basis for guidance in supplementary planning documents.
- 2.349 Policy CS14 is not therefore outdated by changing local housing needs, which it anticipates will happen over the plan period.
- 2.350 The Council adopted its Affordable Housing Supplementary Planning Document (SPD) in 2020. This SPD supplements DMP Policy DES6 "Affordable Housing" (see Policy CS15 below), adopted in 2019 as a replacement for CS Policy CS15, and sets out the

mix of affordable homes needed in the Borough. This SPD was informed by up-to-date evidence of local housing needs (types, sizes and tenure). This updated evidence was published in November 2019 in the [Reigate & Banstead Housing Needs Assessment 2019](#), and can be accessed using this weblink. The 2019 Housing Needs Assessment identifies (at paragraph 7.6) the following mix of housing needed across the Borough:

- 2.351 Local need for market housing is predominantly for larger homes (40% as 3-bedroom, and 30% as 4+bedrooms), with 25% being needed as 2-bedroom homes, and only 5% as 1-bedroom homes.
- 2.352 The need for Affordable Rented and Affordable Home Ownership (such as Shared Ownership or First Homes) is predominantly for 2-bedroom homes (40% and 45% respectively) and 3-bedroom homes (30% and 25% respectively). The need for 1-bedroom and 4-bedroom homes is the same for both affordable housing tenures, at 20% and 10% respectively.
- 2.353 Evidence of local housing needs since the 2012 SHMA therefore shows that whilst the predominant local need for market housing remains for larger homes, and the predominant local need for affordable homes remains for smaller homes, overall there has been a shift towards need for larger homes. The need for market homes has reduced from 40% as 1- and 2-bedroom homes to 30% whilst the need for 3-bedroom plus homes increased from 60% to 70%.
- 2.354 For social and affordable rented, the need for smaller 1- and 2-bedroom homes has reduced from 75% to 60%, against an increased need for larger homes, from 25% to 40%. The need for Intermediate affordable homes (such as Shared Ownership) is now 65% smaller homes compared to 85% in 2012, and 35% larger homes compared to 15% in 2012.
- 2.355 The [annual Housing Monitor](#) published each June, and available using this weblink, shows that a wide variety of homes of different sizes and tenures has been delivered in the Borough since the start of the plan period.
- 2.356 The vast majority of homes delivered over the 11 years since the start of the plan period in 2012 have come from sites granted planning permission before the 2019 Housing Needs Assessment, and therefore their development was guided by the 2012 SHMA recommendations. This monitoring data shows that the mix of housing delivered is broadly in line with the 2012 SHMA identified needs.
- 2.357 The needs for the following 4 years (2020 to 2023) has been guided by evidence in the 2019 Housing Needs Assessment.
- 2.358 Whilst the proportion of 3-bedroom and 4-bedroom social and affordable rent homes to date is below the 2012 SHMA identified need (17% compared to 25%), this reflects the funding shift from provision of social rent to affordable rent, which has reduced the affordability of the larger 3 (and particularly 4) bed homes.
- 2.359 The slight over-delivery of the smaller 1 and 2 bedroom market homes (51% compared to 40% 2012 SHMA target) is partly a result of the introduction of the office to residential permitted development right (requiring Prior Approval) in 2013. Since then, 753 new homes have been delivered in the Borough via the prior approval route (14% of all gross market units delivered within the plan period). The Council has no influence over the size mix of homes delivered via the prior approval route and these homes predominantly consist of smaller 1 and 2-bedroom flats. Whilst local plan policy aims to guide

development towards meeting identified local needs, where the Council has no control over development issues (such as the size of homes in permitted development schemes), Council policy cannot influence this.

- 2.360 Although Policy CS14 does not include targets for the split between houses and flats, it is worth noting that this has been broadly evenly split over the plan period to date over the Borough as a whole (47% flats and 53% houses).
- 2.361 In accordance with Policy CS14, the Policy is being implemented in part through DMP policies (adopted September 2019), which includes Policy DES4 *Housing Mix*. DES4 establishes requirements in relation to housing mix and size in order to support achievement of the above targets and an appropriate housing mix to address current needs, both on specific sites, and across the Borough as a whole. DMP Policy DES7 sets out the requirements for specialist housing in accordance with Core Strategy Policy CS14 (3 and 4).
- 2.362 In relation to older peoples and other specialist housing, 340 net additional care beds have been delivered in the Borough over the plan period. Furthermore, 226 units of additional extra care and retirement housing have been delivered, with a further 387 consented but not yet delivered (54 of those are under construction as at mid-November 2023).
- 2.363 The provisions of Policy CS14 are therefore facilitating delivery of an appropriate mix of housing: Both general needs housing, and also additional specialist housing, including for the elderly and those with mobility and support needs, to meet the identified housing needs within the Borough.
- 2.364 Policy CS14, implemented alongside the DMP 2019 Policies DES4 and DES7 and the Affordable Housing SPD 2020 is achieving its stated objectives in accordance with the Policy, and is therefore considered not to require modification.

Policy CS14: Conclusion

No modification or update to Policy CS14 is required.

CS Policy CS15: Affordable Housing

- 2.365 Policy CS15 sets out the Council's approach to the delivery of affordable housing through the planning system.
- 2.366 It establishes a target of at least 1,500 new affordable housing units in the Borough over the plan period (2012-27), equivalent to 100 per annum.
- 2.367 The policy also sets out the following affordable housing requirements for new developments:
- sites of 15 or more net dwellings – 30% of housing should be affordable;
 - sites of between 10 and 14 net dwellings – a financial contribution broadly equivalent to 20% affordable housing;
 - sites of 1 to 9 net dwellings – a financial contribution broadly equivalent to 10% affordable housing.
- 2.368 The policy provides that the Council will negotiate to achieve affordable housing, taking account of the mix of affordable units proposed and overall viability.

- 2.369 It also seeks to protect existing affordable housing by requiring the same number of homes to be re-provided (as a minimum) where existing affordable housing is being redeveloped.

Policy CS15: Conclusion

- 2.370 Policy CS15 has been formally superseded by Development Management Plan DES6 Affordable Housing, adopted September 2019 (as identified in DMP Annex 2: Superseded Policies).
- 2.371 The overall plan period target to secure a minimum of 1,500 new affordable homes in the Borough between 2012 and 2027 is retained in DMP Policy DES6. The Council has to date (end of March 2023) exceeded its cumulative annual target, delivering 1,129 new affordable homes against the pro-rate annualised average target of 1,100 affordable homes, as detailed in the annual **Housing Monitor**, published on the Council's website each June.

Policy CS16: Gypsies, travellers and travelling showpeople

- 2.372 Policy CS16 identifies that a local target will be established in the DMP, and that the DMP will make provision for a supply of sites to meet those needs, based on a sequential approach, reflecting the "urban areas first" approach of the Core Strategy to "brick and mortar" housing.
- 2.373 The Policy sets specific criteria to guide the identification of sites for allocation in the DMP and for consideration of planning applications on non-allocated sites.
- 2.374 The policy also seeks to protect existing authorised gypsy and traveller sites, subject to conditions.

Conformity with national policy and guidance

- 2.375 The now superseded Planning Policy for Traveller Sites (PPTS) 2012 required Local Planning Authorities to set pitch targets for gypsies and travellers, and plot targets for travelling showpeople to address the likely permanent and transit site accommodation needs of travellers in their area. However, the Core Strategy Inspector noted (at paragraphs 97 and 98), that the PPTS 2012 was published after the CS was submitted for Examination, and was therefore not national policy when the Core Strategy was being prepared, and so the Council was not able to fulfil the PPTS requirements during plan preparation. Core Strategy Policy CS16 therefore identifies that the target for provision of gypsy and traveller accommodation will be identified in the subsequent DMP.
- 2.376 Whilst the Inspector acknowledged (at IR paragraph 98) that this was not ideal, as a need target should be set out in a Core Strategy, he accepted this "pragmatic" approach, given that the PPTS 2012, which was published at the same time as the Proposed Submission Core Strategy (March 2012), set "out a more robust framework for delivery of traveller sites than previously existed" (at the time of the CS was being prepared).
- 2.377 The Inspector recognised that because of this timing, the Council was not able to fulfil the PPTS requirements during preparation of the CS, and therefore accepted that it was "sound" for Policy CS16 to specify that a local target would be identified in the

subsequent DMP.

- 2.378 The absence of a target in the Core Strategy, Policy CS16 is not inconsistent with national policy as Policy CS16(1) set a requirement for a target to be identified in the DMP, which the DMP has subsequently done (adopted 26 Sept 2019).
- 2.379 The Inspector also accepted that there was a need to carry out detailed assessments of potential supply mindful of the constraints (specifically Green Belt) in the Borough, and that this would need to be done through the preparation of the DMP evidence.
- 2.380 In examining the Core Strategy, the Inspector concluded (paragraphs 97 and 98 of CS Inspector's Report) that the sequential approach to identifying suitable sites (urban areas first) was in principle sound and consistent with the Planning Policy for Traveller Sites ("PPTS"), which makes clear that traveller sites within the Green Belt are inappropriate development and thus should only be allocated in such areas in exceptional circumstances.
- 2.381 The various criteria set out in Policy CS16 (3) (a) – (f) are consistent with national planning policy in the PPTS 2023 in paragraph 13 considerations, namely:
- Criteria (a) in Policy CS16 is consistent with criteria (a) at paragraph 13 of the PPTS
 - (b) reflects criteria (f) at para 13 of the PPTS
 - (c) reflects criteria (e) in the PPTS
 - (d) reflects criteria (g) in the PPTS
 - (e) reflects criteria (b), (c) and (f) in the PPTS
 - (f) reflects criteria (e) in the PPTS
- 2.382 The requirement for local plans to set pitch and plot targets is retained in the revised PPTS, 2015 (Policy B, paragraph 9), which was the national policy under which the DMP was prepared.
- 2.383 RBBC's [Gypsy and Traveller Accommodation Assessment \(GTAA\) 2017](#) (which can be accessed using this weblink) was prepared to inform the DMP.
- 2.384 DMP Policy GTT1 identifies a need for 32 additional pitches for gypsies and travellers, and 7 plots for travelling showpeople over the period from 2016 to 2031. This equates to 28 pitches and 5 plots over the Core Strategy plan period to 2027.
- 2.385 These figures include all travellers meeting either the planning definition or the equalities definitions, which is consistent with the 2022 ruling of *Smith* (below) regarding the illegality of the planning policy definition in the 2015 PPTS Annex 1, now reflected in the updated PPTS 2023.
- 2.386 A 2022 Court of Appeal decision, *Smith v Secretary of State for Levelling Up, Housing & Communities & Anor [2022] EWCA Civ 1391*, found the PPTS 2015 definition of "travellers" to be discriminatory on the basis of ethnic identity. The principal issue in this Court of Appeal case concerned the Secretary of State's amendment in August 2015 to the definition of 'Gypsies and Travellers', in "Planning Policy for Traveller Sites" / PPTS, which related to the land-use needs of ethnic Gypsies and Travellers, and excluded those who lead a permanently settled life. In light of this Court of Appeal decision, the PPTS was therefore updated in December 2023 to include within the definition of travellers those who have permanently ceased travelling.
- 2.387 The Council's GTTA 2017 and DMP Policy GTT1(4) reflect this wider definition, and so remain relevant in light of this Court of Appeal decision and of PPTS 2023. R&B

Borough's local plan pitch and plot targets, were based on the meeting the full need, including ethnic travellers and those whose planning status was unclear at the time of the 2016 surveys. The Council took this approach in recognition of its wider equalities obligations duty to plan for culturally appropriate housing to ethnically defined Irish, Romany and Scottish travellers who may have permanently ceased travelling but who may want to live in a caravan.

- 2.388 Policy CS16's approach to assessing the suitability of sites for allocation in the DMP, and of any planning applications for sites not allocated reflect the criteria in the PPTS12 and PPTS15. The Inspector accepted that CS16 is broadly consistent with national policy, which although the PPTS has since been updated, its approach remains unchanged.

Monitoring, local circumstances, and evidence

- 2.389 As outlined above, Policy CS16 establishes that the Council's target for pitch and plot provision in the Borough to meet identified local needs would be set out in the DMP. In 2019, on adoption of the DMP, Policy GTT1 set out the pitch and plot targets for the plan period to 2027. This is consistent with PPTS 2023 Policy B, paragraphs 10(a) and (c).
- 2.390 PPTS 2023 Policy B, paragraph 10(a) requires Local Planning Authorities, in producing their Local Plans to "identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets" of pitches for gypsies and travellers and plots for travelling showpeople.
- 2.391 As set out in the latest Housing Monitor (2023), planning permission has been granted for an additional 35 permanent pitches of gypsy accommodation since the 2016 survey base-date of the GTAA 2017, with a further allocated site with capacity for approximately 4 pitches at one site, which, as is now removed from Green belt designation, and is allocated, is "deliverable" within the next 5 years.
- 2.392 As of 31 March 2023, the Council demonstrated a 16.36 year supply of deliverable permanent traveller pitches against its local plan target.
- 2.393 Since the 2016 GTAA base-date, 4 Travelling Showperson's plots have been granted permanent planning permission, against a need for 3.4 plots over this period. As of 31 March 2023, the Council demonstrated a 3 year supply of deliverable permanent travelling showperson plots against its local plan target.
- 2.394 The Core Strategy Policy CS16 approach to setting a local target for pitch and plot provision within the Borough to meet identified local needs has not prevented or hindered the Borough in meeting its identified needs, and Policy CS16 remains effective, as implemented through its criteria 3 for non-allocated sites, and through DMP Policy GTT1 for setting local plan pitch and plot targets and for allocated sites.
- 2.395 The last traveller accommodation needs survey was undertaken in 2016, approximately 8 years ago. The Council is in currently preparing a consultant's brief to commission specialist consultants to help us with this needs assessment and survey work. However, the current local plan pitch and plot accommodation targets cover the period to 2027 (being based on the 2016 survey which identified needs to 2032), and do not therefore currently need updating.

Policy CS16: Conclusion

2.396 No modification or update to Policy CS16 is required.

Policy CS17: Travel options and accessibility

2.397 This policy contains the overarching approach to travel and transport. It sets out a three-part strategy that seeks to manage demand and reduce the need to travel, promote sustainable transport options and improve the efficiency of the network. This includes directing development towards accessible locations; improving travel options including public transport, walking and cycling; and managing parking provision.

Conformity with national policy and guidance

2.398 The Framework sets out an overarching aim of promoting sustainable travel and the various provisions of Policy CS17 reflect and respond to this. In particular, the policy seeks to manage demand and reduce the need to travel through measures consistent with paragraphs 109 and 110 of the NPPF December 2023. It also seeks to specifically facilitate sustainable travel options, consistent with paragraph 104, particularly parts (b) and (c) but also paragraph 103. Policy CS17 also sets an overarching approach to the management of parking provision that is broadly aligned to the paragraphs 111 and 112: The detailed implementation of these standards has been taken forward in the DMP adopted in 2019.

Monitoring, local circumstances, and evidence

Monitoring, local circumstances, and evidence

2.399 As described above, key transport projects, including those geared toward promoting sustainable travel and more efficient operation of the network, have been delivered. This includes the Local Sustainable Transport Fund and Balanced Network projects in Redhill town centre, as well as improved bus services in Horley to serve the two new neighbourhoods.

2.400 In 2022 The Reigate and Banstead Local Cycling and Walking Infrastructure Plan was endorsed which identifies cycling and walking routes for improvement over the coming 10 years. This builds on the recent and current cycle route improvements being funded by Surrey County Council and the Department for Transport including along the A217 and A23.

2.401 The Surrey Local Transport Plan 4 was adopted in July 2022. This included policies to encourage active travel, improve public transport, promote zero emission vehicles and planning for places that reduce the number and length of car trips.

2.402 Parking standards are set out in the Development Management Plan. They have been devised to respond to accessibility to shops and services in town and local centres and to rail stations, and local car ownership levels as required by Policy CS17, national policy, and taking account of County parking standards, particularly for non-residential uses. Through the determination of planning applications, and DMP Policies including TAP1, travel plans are routinely secured on new developments that are major movement generators.

Policy CS17: Conclusion

2.403 No modification or update to Policy CS17 is required.

Policy CS18: Implementation and monitoring

2.404 Policy CS18 sets out that the commitment to regularly monitor progress towards the development targets in the plan and the delivery sites. It also contains a series of potential management actions and measures that may be implemented to facilitate delivery.

Conformity with national policy and guidance

- 2.405 Policy CS18 sets out an overarching commitment to regular monitoring of the effectiveness and operation of policies in the Core Strategy, to secure the timely delivery of development and infrastructure.
- 2.406 This includes the national requirements for maintaining a housing trajectory and supply of deliverable sites to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies (NPPF paragraph 75).
- 2.407 The Council also monitors and annually reports on the supply of new permanent traveller pitches and travelling showperson plots within the Borough, as required by Planning Policy for Traveller Sites (PPTS) 2023 Policy B, paragraph 10(a). This requires Local Planning Authorities, in producing their Local Plans to "identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets" of pitches for gypsies and travellers and plots for travelling showpeople.
- 2.408 Due to a change in the Community Infrastructure Regulations 2010 (as amended), since 2020, the Council has moved from reporting s106 planning obligations and Community Infrastructure Levy (CIL) in its Annual Monitoring Report, to publishing on its website an [Annual Infrastructure Funding Statement](#) of planning obligations and CIL receipts, allocations and spends, which can be accessed using the weblink provided.

Monitoring, local circumstances, and evidence

- 2.409 On-going monitoring of the effectiveness of the Core Strategy policies is undertaken against the [Core Strategy Monitoring Framework](#) referred to in the Explanatory text to Policy CS18 (paragraph 8.12), and available on the Council's website using this weblink.
- 2.410 The '[Core Strategy Monitoring Framework' September 2014](#) which can be accessed using this weblink) provides a series of indicators, broadly being either "significant effects indicators" (which measure progress against CS objectives and contextual indicators), or "delivery indicators" (which assess the effectiveness of CS policies). Some strategic policies have specific targets which are included in the [CS Monitoring Framework](#), while for others, performance trends allow effectiveness of the policy to be measured.
- 2.411 As confirmed by paragraph 8.14 of the Explanatory text to Policy CS18, the Council actively monitors performance against the plan's indicators and publishes this information annually on its website through [a suite of Monitoring Reports](#), as well as in the Authority

Monitoring Report (AMR), which you can access using the weblink provided.

- 2.412 The Council's monitoring considerably exceeds the legislative requirements under Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012, and helps to keep up to date the requirement (under section 13 of the Planning and Compulsory Purchase Act 2024) to keep under review the matters which may be expected to affect the development of the area or the planning of its development.
- 2.413 Throughout the plan period, including since adoption of the DMP in 2019, the Council has proactively facilitated the delivery of allocated development sites and other sustainable development opportunities, including through use of Planning Performance Agreements where suitable.
- 2.414 In recent years the Council has used its own land interests to act as a catalyst for development, particularly to contribute to meeting local affordable housing needs through three recent schemes at Wheatly Court, Cromwell Road, Redhill; Octavia Cottages, Lee Street, Horley; and Camelia Close, Pitwood Park in Tadworth, which have contributed towards meeting the Core Strategy targets for affordable housing as well as to other Corporate Plan (2020-2025) targets.
- 2.415 The Council's Place Delivery Team actively works with Surrey County Council and other partners to deliver effective town centre regeneration schemes in Redhill and Horley, including through the "Delivering Change in Horley Town Centre" programme of four projects which the Council leads alongside its partners, SCC, Horley Town Council and the Coast to Capital Local Enterprise Partnership (LEP).

Policy CS18: Conclusion

- 2.416 No modification or update to Policy CS18 is required.

Local Plan Review Conclusions

- 3.1 This review of the Local Plan Core Strategy policies, within five years of the approval and adoption of its last review (on 2 July 2019), has been undertaken to comply with the requirements of Regulation 10A of the “the Local Plan Regulations”. The purpose of the review was to assess whether each of the Core Strategy policies is up to date and remains effective.
- 3.2 The Core Strategy review has had due regard to the relevant legislative requirements, national planning policy (notably the NPPF 2023, PPTS 2023 and Written Ministerial Statements), and the associated national Planning Practice Guidance (PPG).
- 3.3 Based on the assessment commentary for each policy provided in the table above, it is concluded that all of the 18 Core Strategy policies are generally consistent with national policy, including the NPPF 2023 and other relevant national policies (such as those relating to travellers’ accommodation and to aviation), and WMSs.
- 3.4 The latest evidence and monitoring data demonstrates that the Core Strategy policies are operating effectively and delivering positively against the requirements, objectives and indicators of the plan, including against its local plan housing delivery requirement.
- 3.5 It is of particular note that:
 - The Council’s housing delivery performance over the plan period to date is strong (completion of an average of 573 new homes per year), exceeding the minimum pro-rata requirement of 460. This demonstrates that the application of the plan is facilitating the maximisation of suitable sustainable locations for housing development, overwhelmingly to date within the urban area, including a higher windfall delivery than anticipated (an annual mean average of 263 new homes completed each year on windfall sites between 1 April 2012 and 31 March 2023), which has been in part due to the national extension of permitted development rights, whilst protecting Green Belt and other locations subject to constraint.
 - With the sites allocated in the Local Plan Development Management Plan in accordance with Policy CS6 “Allocation of land for development”, and the high number of new homes completed on windfall sites, the Council’s Core Strategy is on course to deliver considerably more than the minimum local plan housing requirement of “at least 6,900 homes between 2012 and 2027” under Policy CS13. As of 31 March 2023, 6,303 additional (net) new homes had been completed in the Borough since the start of the plan period in 2012, compared to the pro-rata housing target for that period of at least 5,060.
 - Since the adoption of the Core Strategy in 2014, the Council has consistently demonstrated a five-year land supply, which has not been successfully challenged. This includes an appeal which was dismissed on 30 November 2023 (ref: RH2 8HH APP/L3625/W/23/3317013; application Ref: 21/00400/OUT) for the development of Land at Sandcross Lane, Reigate, Sustainable Urban Extension to be “released” under DMP Policy MLS1 due to lack of a predicted 5-YHLS in the forthcoming two years. The Inspector in this decision also expressed some doubt as to whether the standard method was capable of accurately assessing housing need, given the age of

the statistical information stipulated to be used (2014-based projections) as the baseline.

- The Housing Delivery Test results submitted to the government each year (the latest on 19 December 2023 demonstrating 168%) confirms this strong performance.
- Regular monitoring and Appeals performance, clearly indicates that the plan policies are being implemented and applied effectively and appropriately. Monitoring and appeals performance demonstrate that sustainable development is being supported through the Council’s decision-taking, including crucially towards the housing requirement set out in Policy CS13, delivery of “at least 6,900 homes between 2012 and 2027”.

3.6 With the end of this current plan period a few years away (2027), the Council has started to prepare its new Local Plan, with a timetable for its preparation, the Local Development Scheme (LDS) published on the Council’s website in October 2022. A formal launch event for new Local Plan was held in February 2023, with information provided and an opportunity for questions and discussions with Council officers and councillors. An article on the preparation of a new local plan for the Borough was included in the [Autumn 2023 “Borough News”](#), which was delivered to households in the Borough and was published on the Council’s website. The article provided information on what a local plan is about, and included a call for individuals and communities to get involved in its production.

3.7 The Council is currently at an early stage in the preparation of its new local plan, gathering evidence to establish the issues. Whilst evidence studies are being prepared and commissioned (where specialist technical input is required) to inform a new plan, there have however been national changes made by parliament to the legal framework governing how plans are prepared, aimed at making plan making simpler, faster and more accessible. These changes do not currently have any date from which they will take effect, nor detail of how they will operate. Due to the changes to the plan-making system that will be introduced through the provisions of the Levelling Up and Regeneration Act 2023, a new timetable for the preparation of a new local plan is now proposed.

3.8 The Council continues to work on evidence and data to inform its next local plan. However, to avoid wasted time and financial resources in seeking views on a local plan that may have to be abandoned, the Council has chosen not to carry out any formal consultation stages as set out in the current LDS, until details of national changes are confirmed.

3.9 Legislation and guidance stipulate that once a Council has reviewed its local plan policies to assess whether or not they currently remain up to date and effective, if the Council determines that they are currently up to date and effective, and therefore do not need to be revised or updated, it must publish the reasons for considering that no revision is necessary. Given the conclusion of this local plan review, the Council will therefore publish this document on its website and make it available as required, as comprised the reasons why there is no present need to update the local plan policies.



Duty to Co-Operate responses to the draft local plan Core Strategy Review 2024

Duty to Co-operate for Local Plan Core Strategy Review 2024

The Council's advice from Counsel on the issue of local plan reviews advises that the Duty to Cooperate is not a legal requirement for local plan reviews, but for the plan-making process, which a local plan review is not part of. A local plan Review may, or may not, result in the need to update a local plan.

However, the national web based PPG has been revised since the core strategy was last reviewed in 2019, and it now includes the guidance that "*Local planning authorities need to comply with the Duty to Co-operate when revising their development plan documents and reviewing whether they remain up to date.*" It refers to Section 33A(3d) of the Planning and Compulsory Purchase Act 2004, as it says plan reviews prepare the way for the preparation of preparation of development plan document as they involve an assessment of whether policies in a plan need updating. Whilst our own legal advice does not reflect with this interpretation, we have nonetheless engaged with the relevant duty to cop-operate bodies and specific consultees in finalising the local plan core strategy review.

The draft Local Plan Core Strategy Review was sent to 'Prescribed Bodies' for the Duty to Co-operate and 'Specific Consultees' including nearby local authorities, inviting them to submit any relevant comments on the draft which they wished us to consider in finalising the local plan core strategy Review to put to the Council for approval and adoption. Comments were invited over a three week period in January and February 2024.

A summary of those comments received, and an officer response is provided in Table 1 below. No fundamental issues were raised which officers consider indicted challenge the conclusion that the local plan core policies remain up to date and effective.

Table 1: Comments received on Duty to Co-operate consultation of the draft local plan Core Strategy Review 2024

Organisation	Summary of comments received	Officer 's response
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<p>Surrey County Council</p>	<p>This is an officer response, and we have the following comments to make.</p> <p>Ecology</p> <p>We recommend editing paragraph 2.15 as biodiversity net gain was delayed and will now become a 'legal requirement to most 'major' developments from January 2024 12th February 2024, and is due to come into force for other smaller developments from <u>2nd</u> April 2024.'</p> <p>A requirement of the Environment Act 2021 is the production of a LNRS in a collaborative and evidence-based manner and the engagement process for this commenced in 2023, with the aim to complete the strategy by 2024.</p> <p>We would welcome Reigate and Banstead's involvement in this process to ensure local opportunities for nature recovery are identified and linked into a network for greater ecological resilience.</p> <p>As responsible authority for the Local Nature Recovery Strategy (LNRS) we would like to see acknowledgement of the LNRS in this draft review document and expect to see the LNRS referenced in policy in the new Local Plan.</p> <p>Flood Risk</p> <p>Paragraph 1.23 mentions flooding and coastal change, but we would also like to see specific reference to Sustainable Drainage systems that should be included in major developments - particularly given the significant surface water flood risk that exists within Reigate and Banstead and the opportunities that could be created to better manage and reduce this risk.</p> <p>We acknowledge that Policy CS10 refers to Sustainable Drainage</p>	<p>Paragraph amended accordingly</p> <p>LNRS policy is considered in the review of Policy CS2 and has been noted for work to produce our new Local Plan.</p> <p>The Council's Climate Change and Sustainable Construction SPD 2021</p>
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	<p>systems (SuDs) as a way to manage flood risk and the DMP includes a detailed policy on flood risk that includes SuDs.</p> <p>We would like to see the new Local Plan consider retrofitting and the inclusion of SuDs into existing developed areas which will offer multi-functional benefits.</p> <p>Minerals and Waste</p> <p>No issues are identified with the existing policies of the Core Strategy, but we would expect the new Local Plan to address sustainable waste management issues, including the provision of Site Waste Management Plans for major development.</p> <p>SCC has published a <u>Sustainable Construction and Waste Management in New Development Guidance Note</u>, that provides details for national and local policy for sustainable waste management.</p> <p>We would also welcome consideration of the following matters in the new plan: safeguarding existing waste management facilities, Waste Consultation Areas, Mineral Safeguarding Areas, existing mineral sites, and resources in the county.</p> <p>We have recently updated and published our <u>Mineral Safeguarding Note</u>, outlining the importance of mineral resources and mineral safeguarding policies.</p>	<p>includes further detail on provision of SuDS.</p> <p>Request noted, and retrofitting of SuDS will be considered through the evidence and preparation of a new local plan</p> <p>Request noted, and will be considered through the evidence and preparation of a new local plan, including safeguarding existing waste management facilities and Minerals Safeguarding Areas</p>
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<p>Mole Valley District Council</p>	<p>The RBBC Local Plan Core Strategy (adopted in 2014) Review 2024 concludes that all of the Core Strategy policies are generally consistent with national policy and remain up-to-date and effective. This Core Strategy Review is subsequent to a previous review carried out in 2019.</p> <p>Mole Valley District Council (MVDC) does not have any comment to make on the robustness of this assessment of the performance and efficacy of a 10-year-old Core Strategy. However, MVDC would like to make a few observations with respect to the potential consequences of RBBC's conclusion.</p> <p>RBBC's current Core Strategy housing target is a minimum of 6,900 homes between 2012 and 2027 under Policy CS13, or 460 homes per annum. Under the national standard method, the housing need figure for RBBC is 156% higher, at 1,123 homes per annum. RBBC notes that if the Core Strategy's policies were found to require updating, 1,123 would be the applicable figure. RBBC's housing delivery performance over the plan period to date is 573 new homes per year, exceeding the minimum plan requirement, but roughly half the standard method figure.</p> <p>For the RBBC 2014 Core Strategy, the Inspector concluded: "the full, objectively assessed need for housing over the plan period is an annual average of between about 600 and 640 dwellings."</p> <p>RBBC appears to consider that the national standard annual local housing need for the Borough (1,123) does not represent a significant change from the housing need identified by the Inspector. The Planning Practice Guidance does not indicate whether a 75 % to 87 % uplift would be a significant change. However, given the extent of the discrepancy in the figures 10 years from the adoption of the Core Strategy, it is imperative that RBBC's assessments of housing land availability and analysis of constraints are rigorous and up-to-date.</p>	<p>This is a mis-reading of the draft local plan CS Review, which at paragraph 2.289 of the draft document clearly stated that the standard method to be applied to R&B at this time would be capped.</p> <p>As noted in the local plan Core Strategy Review, the local housing need number calculated using the standard method currently produces a local housing need number of 644 homes per annum (capped at 40% above the plan figure because the Core Strategy has been reviewed and found not to need updating within the last 5 years). This figure is clearly very close to the "annual average of between about 600 and 640" identified by the CS Inspector. The CS Review (paragraph 2.295) has been amended to make the Council's point clearer that the local</p>
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	<p>RBBC is currently at an early stage in the preparation of its new local plan. However, even at this stage, it is important RBBC has an appreciation of the potential for MVDC to accommodate any unmet housing need. MVDC's stage in the plan-making cycle precludes it from being able to take unmet need. Even if MVDC were at an earlier stage in the plan preparation cycle, it would be unable to meet unmet housing need from other authorities. 77% of MVDC's area is designated as either Green Belt or Area of Outstanding Natural Beauty.</p> <p>The built-up area only comprises 11% of the area and the two principal towns, Leatherhead and Dorking, are historic market towns with significant and extensive heritage constraints limiting development to little more than very gentle densification.</p> <p>As a result of these constraints, MVDC's emerging local plan would meet only approximately 75% of its own need. Given this state of affairs, MVDC would not be able to consider meeting need from outside its borders.</p> <p>Gypsies and Travellers</p> <p>RBBC's last traveller accommodation needs survey was undertaken in 2016 and it is understood that RBBC is preparing a brief to commission consultants to complete a needs assessment.</p> <p>Policy GTT1 of the RBBC Development Management Plan identifies a need for 32 additional pitches for gypsies and travellers over the period from 2016 to 2031. This equates to 28 pitches over the Core Strategy plan period to 2027.</p> <p>As set out in the latest Housing Monitor (2023), planning permission has been granted for an additional 35 permanent pitches of gypsy accommodation since the 2016 survey base-date of the GTAA 2017, with a further allocated site having capacity for approximately four</p>	<p>housing need number has not changed significantly.</p> <p>As an edge-of London authority with considerable constraints to development, including 70% of the Borough designated as Green Belt, we appreciate the difficulties in meeting local housing needs in full, and note that MVDC will not be able to accommodate any unmet housing need from R&B Borough.</p> <p>This is the current position</p>
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	<p>pitches. As of 31 March 2023, the RBBC demonstrated a 16.36-year supply of deliverable permanent traveller pitches against its local plan target.</p> <p>MVDC's stage in the plan-making cycle precludes it from being able to take unmet need.</p> <p>Furthermore, even if MVDC were at an earlier stage in the plan preparation cycle, it would be unable to accommodate unmet Gypsy and Traveller need from other authorities.</p> <p>MVDC's has an identified need of 52 Gypsy and Traveller pitches over its draft Local Plan period (encompassing both planning and housing definitions of Gypsies and Travellers).</p> <p>MVDC's strategy for meeting this need is through allocating new pitches on strategic development sites, most of which would be released from the Green Belt, and the intensifying of specific existing Gypsy and Traveller sites.</p> <p>Based on the 2021 NPPF definition, the five-year target from adoption and the need over the plan period should both be met. However, MVDC is reliant on (albeit robust) windfall provision to meet the Lisa Smith/2023 NPPF definition. The margin for manoeuvre is therefore tight, especially if one or more sites fails to be developed.</p> <p>Consequently, MVDC would not be able to accommodate unmet need Gypsy and Traveller from RBBC should a more up-to-date GTAA demonstrate a greater need.</p> <p>Travelling Showpeople</p> <p>Policy GTT1 of the RBBC Development Plan identifies a need for seven plots for travelling</p>	<p>We note that MVDC will not be able to accommodate any unmet G&T pitch need from R&B Borough</p>
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	<p>showpeople over the period from 2016 to 2031. This equates to five plots over the Core Strategy plan period to 2027. Since the 2016 GTAA base-date, four Travelling Showperson's plots have been granted permanent planning permission, against a need for 3.4 plots over this period. As of 31 March 2023, the RBBC demonstrated a 3-year supply of deliverable permanent travelling showperson plots against its local plan target. Thus, it is noted that RBBC is currently unable to identify a supply of specific deliverable sites sufficient to provide five years' worth of provision for travelling showpeople.</p> <p>The identified need in Mole Valley for Travelling Showpeople provision is for four plots in the first five years of the Local Plan, with two additional plots required in the period beyond. At the time of preparing the Plan, it was not possible to identify a specific available and suitable site. This use can potentially be met through the redevelopment of brownfield land that becomes available during the plan period. Alternatively, provision may be acceptable within one of the strategic housing sites that provides good access to the strategic highway network. Given this situation, MVDC would not be able to consider accommodating unmet need from RBBC.</p> <p>We look forward to continuing the active and constructive engagement between MVDC and RBBC on strategic cross-boundary matters, such as Gatwick.</p> <p>In particular, it is recognised that the proposed development extensions to the village of Hookwood would require ongoing collaboration with RBBC and other parties, such as Surrey County Council, on issues like health and education infrastructure and accessibility to the services and amenities of Horley Town.</p>	<p>We note that MVDC will not be able to accommodate any unmet TS plot need from R&B Borough</p> <p>We will continue with our positive co-operation throughout preparation of our respective local plans, planning of supporting infrastructure, and other strategic planning issues such as Gatwick Airport.</p>
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Elmbridge Borough Council	The Borough has no comments to make at this time. We look forward to continuing to engage with you	Response noted
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Waverley Borough Council	<p>Housing Need</p> <p>Waverley notes that Policy CS13 of the Core Strategy seeks to deliver at least 6,900 homes from 2012 to 2027 which equates to 460 homes per annum. However, it is also noted that this is short of the figure that would be produced using the standard method for assessing housing needs. Whilst Waverley acknowledges that Reigate and Banstead consider that they are unable to accommodate any more housing beyond the level which the adopted Core Strategy Inspector found to be capable of being sustainably delivered, it is unclear how any shortfall in housing need will be delivered going forward.</p> <p>I am of the view that Waverley is unlikely to be able to meet any unmet needs from neighbouring authorities and therefore any unmet needs in Reigate and Banstead must be met within the Housing Market Area that the Borough lies in.</p> <p>It is currently challenging for Waverley to meet the housing requirement set out in its adopted Local Plan Local Plan Part 1 (LPP1) (adopted February 2018) given the significant planning constraints that cover our Borough, including the Green Belt, National Landscapes and the proximity of Habitats sites in the form of Special Protection Areas. Waverley is also preparing a new Local Plan following a review of LPP1. The standard method for calculating local housing need currently shows that the difference between the strategic housing requirement in the Waverley LPP1 is significantly higher which presents an even greater challenge.</p>	<p>We note that there is no legal nor national policy requirement for an area's local housing needs to be met in full.</p> <p>Whilst NPPF paragraph 60 provides in relation to local plans, that "<i>The overall aim should be to meet as much of an area's identified housing need as possible</i>", NPPF paragraph 11 relating to sustainable development confirms that strategic policies for housing and other uses should provide for objectively assessed needs (as well as any needs that cannot be met in neighbouring areas) UNLESS national planning policies in NPPF footnote 7 protecting Green Belt, Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty, areas at risk of flooding, irreplaceable habitats, heritage assets, etc, provide a strong reason to restrict the scale of development, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.</p> <p>This was the position on conclusion of the CS Examination.</p> <p>We appreciate the position that Waverley is in, although R&B has exceeded its minimum local plan</p>
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	<p>Gatwick Airport</p> <p>It is noted that Policy CS9 sets out the Council’s strategic position on Gatwick Airport and supports its development within the existing airport boundary and legal limits. Waverley Borough Council declared a Climate Change Emergency in September 2019 and supports the reduction in carbon emissions including through the aviation industry. Waverley therefore continues to submit representations on proposed Airport development.</p>	<p>housing requirement over the plan period to date.</p> <p>Noted. – The Council is also working with other authorities in the area on responses to Gatwick’s DCO application.</p>
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<p>Salfords and Sidlow Parish Council</p>	<p>1 Paragraph 1.18</p> <p><i>says “It will be up to local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area - be that our precious Green Belt or national parks, the character or an area, or heritage assets.”</i></p> <p>Question 1 Does “<i>It will be up to local authorities . . . to determine how many homes can . . . be built</i>” mean the Borough can now specify the number of new homes they need to make provision for rather than be told the number it has to meet?</p> <p>Question 2 If not, what does it mean?</p> <p>Question 3 Does “<i>It will be up to local authorities . . . to determine how many homes can . . . be built, taking into account what should be protected in each area - be that our precious Green Belt etc</i>” mean protection of the Green Belt boundaries will be stronger?</p> <p>Question 4 If not, what does it mean?</p> <p>Question 5 If either is correct what policy shows how the Borough will achieve this?</p> <p>Question 6 How will Policy CS13: Housing delivery reflect this?</p> <p>2 POLICY CS3 GREEN BELT</p> <p>Paragraph 2.19 says “<i>The Policy also requires green spaces, green corridors and site important site-specific green features to be retained and enhanced as far as practicable.</i>”</p>	<p>Question 1 - Yes.</p> <p>The Council’s new local plan housing requirement for the area will be informed by local evidence (including of constraints under NPPF paragraph 11 and footnote 7) and communities, with the standard method for assessing local housing needs being “an advisory starting point”. (NPPF paragraph 61)</p> <p>Question 3 – National planning policy is not explicit that there is no requirement for local authorities to assess their Green Belt for development nor to release Green Belt land for development by altering its boundaries.</p> <p>Paragraph 2.19 of the Draft LP CS Review relates to Policy CS2, which protects the hierarchy of designated habitat sites in the Borough</p>
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	<p>2.48 says <i>“The Council’s evidence demonstrates that the Green Belt in the borough continues to serve an important strategic purpose, and that its boundaries remain relevant and robust.”</i></p> <p>2.62 says <i>“No modification or update to Policy CS3 is required. This Policy is consistent with national policy as far as parts 1 and 2 are concerned and has run its course as far as parts 3 to 6 are concerned, as a green belt review was undertaken to inform the DMP with sustainable urban extension sites allocated.”</i></p> <p>Question 7 Is there any need for new alterations to the Green Belt boundaries?</p> <p>Question 8 If so, where are these likely to be?</p> <p>2.62 The conclusion says <i>“No modification or update to Policy CS3 is required. This Policy is consistent with national policy as far as parts 1 and 2 are concerned and has run its course as far as parts 3 to 6 are concerned, as a green belt review was undertaken to inform the DMP with sustainable urban extension sites allocated.”</i></p> <p>The Sustainable Urban Extensions report refers to two areas of possible housing development in Salfords, one east of Salfords and one west of Salfords. Neither is clearly named or specified in this review. There are three possible areas east of Salfords. Land north of Honeycrook Lane, Land south of Whitebushes Estate and land west of Pickets Lane.</p> <p>Comment 1 To avoid doubt site titles and designations should be clear, consistent and unique.</p>	<p>Paragraph 2.19 of the draft Local Plan Core Strategy Review relates to Policy CS2 ‘<i>Valued landscapes and the natural environment</i>’, whilst paragraphs 2.48 and 2.62 relate to Policy CS3 Green Belt.</p> <p>Question 7 - As has been made clear in the revised NPPF (through wording emphasis rather than change in policy), it is a local authority’s choice whether to alter Green Belt boundaries. The Council is not currently intending to assess the Green Belt in the area. We draw to your attention NPPF paragraph 145 <i>“Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, ... Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long</i></p>
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	<p>3. POLICY CS9: GATWICK AIRPORT</p> <p>The conclusion in 2.237 says <i>“No modification or update to Policy CS9 is required.”</i></p> <p>This seems to ignore concern raised in the Borough’s Gatwick Northern Runway DCO Application Representation dated 26 October 2023.</p> <p>Core Strategy Policy CS9 says <i>‘The Council will support the development of Gatwick Airport, within the existing airport boundary and existing legal limits, including the development of facilities that contribute to the safe and efficient operation of the airport.’</i></p> <p>2.229 says <i>‘The UK’s Sixth Carbon Budget’ 2021, introduced a statutory cap on aviation emissions for the first time through the DfT’s ‘Jet Zero Strategy: Delivering net zero aviation by 2050’ (July 2022), which sets ambitious targets for achieving zero emissions from the aviation sector by 2040 for internal flights and 2050 for external flights.</i></p> <p>2.236 Policy CS9 does not preclude additional capacity within Gatwick Airport, and whilst the outcome of the DCO submission is still</p>	<p><i>term, so they can endure beyond the plan period.”</i></p> <p>The Sustainable Urban Extensions reports that refer to these areas informed the Core Strategy’s assessment of Green Belt land, and Policy CS6(3).</p> <p>We note this issue of clarity of site referencing for our new Local Plan evidence.</p>
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	<p>unknown, a clearer picture of the growth impacts is emerging. Continued monitoring of the progress of the Gatwick Northern Runway DCO will continue, but it is not considered to require Policy CS9 to be modified at this time. It is unlikely that a decision will be reached on the submitted DCO by the Examining Authority until late 2024 at the earliest.</p> <p>Note policy CS1 : Presumption in Favour of Sustainable Development, which says . . . <i>the Council. . . will work proactively with applicants to secure development that improves the economic, social and environmental conditions in the area</i></p> <p>Comment 2 In order to avoid the Borough’s Gatwick Northern Runway DCO Application Representation (GNRDAR) being dismissed as contrary to the Core Strategy Policy CS9 should include <i>“The council will oppose any growth at Gatwick Airport, including any increase in runway capacity, which would have an adverse effect on any of the following; landscape and townscape, ecology, water, traffic, and transport, air quality, noise, climate change, socio-economic concerns, the Code of Construction Practice, the Design and Access Statement, health and wellbeing, agriculture and recreation and the Council’s additional concerns. [from paragraph 3 of the (GNRDAR)]</i></p> <p>4. POLICY CS16: GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE</p> <p>The Conclusion at 2.398 says <i>“No modification or update to Policy CS16 is required.”</i></p> <p>Question 9 Does the Core Strategy identify sufficient land for gypsies, travellers and travelling showpeople to mean the Borough can successfully prevent these people from setting up their own sites?</p>	<p>There is no conflict between Policy CS9 and the Borough Council’s submitted representation to Gatwick’s DCO.</p> <p>The Borough Council is challenging the DCO application on a number of environmental grounds including air quality and noise. Policy CS9 does not therefore currently need to be updated.</p> <p>Policy CS16 and DMP Policy GTT1 together provide for policy criteria and site allocations to meet the needs identified in the latest Gypsy and Traveller Accommodation Assessment (2017) Individuals and families sometimes do still purchase land and set up unauthorised sites, and sometimes</p>
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	<p>Question 10 If not what more is required and will it be done?</p> <p>We hope these comments and questions are useful and will be seriously considered in the Local Plan core strategy review.</p>	<p>these are permitted either by the Council or at appeal because of a variety of factors, that may include personal circumstances and best interests of children.</p>
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<p>Environment Agency</p>	<p>We understand you are reviewing your existing Core Strategy (adopted July 2014) as part of the requirement outlined in the National Planning Policy Framework (NPPF) to conduct a review every 5 years.</p> <p>We have reviewed the policies related to matters within our remit and respond as follows:</p> <p>Policy CS2: Valued landscapes and the natural environment</p> <p>With reference to the above policy, our role and focus is on protecting and enhancing the water environment including watercourses and wetland habitats.</p> <p>Paragraph 2.14 states that the requirement for measurable biodiversity net gain (BNG) on most development sites will come into effect in January 2024. This has subsequently been delayed until 12 February 2024.</p> <p>Whilst we agree that there is no requirement for the existing core strategy to be modified to reflect the statutory BNG instruments, we would strongly recommend that you develop a local BNG policy in a future local plan.</p> <p>A locally specific biodiversity net gain policy would allow you to identify specific priorities and strategies you require developers to consider delivering BNG, e.g., Local Nature Recovery Strategies, important habitats, Biodiversity Action Plans, and Green and Blue Infrastructure strategies.</p> <p>We have no further comments to add on this policy and no objections to the wording of this policy being kept the same.</p> <p>Policy CS10: Sustainable Development</p>	<p>Dates noted changed.</p> <p>The Council is currently considering how it will secure BNG and we are agreed that this issue will be considered in preparing our new Local Plan (a single local plan consisting of Vision, strategy, site allocations, and detailed local DM policies).</p>
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	<p>This policy references matters of interest to us including water pollution / quality, climate change adaptation and flood risk.</p> <p>We agree that no update or modification is required, and that this core strategy policy is still consistent with the requirements of the NPPF.</p> <p>We highlight that there have been several changes to the “<u>Flood Risk and Coastal Change</u>” section of the Planning Practice Guidance since the publication of the Core Strategy in 2014, which we would expect to see reflected in a future new Local Plan and evidence base.</p> <p>For your information, I have attached a briefing note which summarises the major changes made to the <u>Flood Risk and Coastal Change</u> section of the PPG in August 2022.</p> <p>We are pleased to note (paragraph 2.252) that over the plan period to date, there have been no developments approved contrary to our advice.</p> <p>In summary we are comfortable that the Core Strategy remains an appropriate strategic policy framework for managing development in the borough.</p>	<p>Noted</p> <p>Thank you for highlighting this section of the PPG, which we will consider fully as we prepare our new Local Plan.</p> <p>Noted</p>
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National Highways	<p>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN).</p> <p>The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M25, M23 and part of the A23.</p> <p>Following review of the Core Strategy Review document, we note the Core Strategy is on target and remains consistent with national policy. There were no particular issues raised previously that impacted on the SRN in relation to the adopted Core Strategy, and therefore we have no comments to make on this review.</p> <p>Moving forward with the new Department for Transport Circular 01/2022 ‘Strategic road network and the delivery of sustainable development’, we will be looking more closely at adherence to national policy, and in particular, in relation to our net zero strategy and sustainable measures requirements. We look forward to continuing to participate in future consultations and discussions.</p>	Comments noted.
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<p>Historic England</p>	<p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.</p> <p>There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets.</p> <p>Historic England wishes to highlight the objective of the Paragraph 196 of National Planning Policy Framework to set out in the local plan "<i>a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.</i></p> <p><i>This strategy should take into account</i></p> <ul style="list-style-type: none"> <i>a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;</i> <i>b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</i> <i>c) the desirability of new development making a positive contribution to local character and distinctiveness; and</i> <i>d) opportunities to draw on the contribution made by the historic environment to the character of a place."</i> <p>A strategic strategy for the historic environment as required by paragraph 20 d) of NPPF, in our view, is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the</p>	<p>The current Local Plan is in two parts, the Core Strategy 2014 and the subsequent Development Management Plan 2019 (DMP), which provides detailed policies for assessing planning applications and site allocations.</p> <p>DMP 'Policy NHE9: Heritage Assets' and its Explanation provide a positive strategy that we consider accords with NPPF paragraph 196, as it was required by PINS Local Plan Inspector to be amended in order to be fully consistent with the NPPF (see Main modification MM21).</p> <p>Local Plan Policies CS4 and NHE9 are amplified by guidance provided in</p>
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	<p>asset(s) and make a positive contribution to local character and distinctiveness.</p> <p>You should satisfy yourself that the Review of extant policies reflects the requirements of both paragraphs 196 and 20 d) of the NPPF. In our view, the Review is an opportunity to start the process of updating the historic environment policies of the local plan, and the assessment of Core Strategy Policy CS4: Valued townscapes and the historic environment does not fully address this.</p> <p>We trust that as the new local plan evolves, the Council will revisit the policies relating to the historic environment of the Borough and ensure that the new plan is robust and sound, and well evidenced.</p> <p>We should like to stress that this opinion is based on the information provided by the Council in its consultation.</p> <p>To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p> <p>We hope that these comments are useful.</p>	<p>the 2021 Local Distinctiveness and Design Guide SPD.</p> <p>As noted in the LP CS Review, Policy CS4 is supplemented by detailed design requirements in Development Management Plan Policy NHE9. We are satisfied that together, the two parts of our Local Plan reflect the requirements of NPPF paragraphs 20d and 196.</p> <p>The new Local Plan, which is currently at the very early stages in its preparation, will be a single local plan, and so will address both strategic and local details development, design and heritage issues.</p>
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<p>Thames Water</p>	<p>Thames Water are the statutory sewerage undertaker for the whole of the Borough and the statutory water undertaker for a small area of the north west corner of the Borough and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.</p> <p>Policy CS10: Sustainable Development - Water Efficiency</p> <p>Policy CS10 is supported in principle but needs strengthening to ensure water efficiency standard of 110 litres per person per day is met (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Reference ID: 56-014-20150327) and support the inclusion of this requirement in Policy.</p> <p>We understand that the water efficiency standard of 110 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations).</p> <p>Given that the Environment Agency has designated the Thames Water region to be an area of “serious water stress”, reflecting the extent to which available water resources are used, this planning condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>We therefore support Policy DM7 in referring the use of planning conditions. However, clarification should be provided in relation to the preferred ‘Fittings Approach’.</p> <p>We therefore consider that additional text (provided) should be included in Core Policy 1:</p> <p>Policy CS12: Infrastructure Delivery - Water Resources and Waste</p>	<p>This level of detail is more suited to a DM policy or to Supplementary Planning Document guidance rather than to a strategic policy such as CS10. .</p> <p>Noted, but not relevant to the CS Review</p> <p>It is unclear what Policy DM7 and Core Policy 1 are.</p>
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	<p>Water Infrastructure</p> <p>We generally support the reference to water and wastewater infrastructure, but it is such an important issue that it should be covered in a separate ‘Water Resources and Wastewater Infrastructure’ policy in the new Local Plan and that it should be improved in line with the following detailed comments:</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.’</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), 2021, states: “<i>Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...</i>”</p> <p>Paragraph 28 relates to non-strategic policies and states: “<i>Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...</i>”</p> <p>A summary of the requirements of various parts of the web based National Planning Practice Guidance (NPPG) on ‘water supply, wastewater and water quality’ is provided.</p> <p>The new Local Plan should therefore seek to ensure that there is</p>	<p>Development Management Plan (DMP) 2019 Policy INF1 includes more detailed requirements relating to proposed developments and impacts on local utilities networks.</p> <p>Key infrastructure to support the development planned by the Core Strategy is included for each area in Policy CS8</p> <p>As the Core Strategy is the strategic part of the Borough’s Local Plan, this is not relevant to the CS Review. The Development Management Plan (DMP) allocated sites for development and includes detailed policies for development management, including consideration of adequate suitable supporting infrastructure.</p>
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	<p>adequate water and wastewater infrastructure to serve all new developments. We consider that the New Local Plan should include a specific policy on the key issue of the provision of 'Water Resources/Supply and Sewerage/Wastewater Infrastructure' to service development.</p> <p>We therefore recommend that Core Policy 9 is amended to cover both 'Water Resources & Wastewater Infrastructure'.</p> <p>Q12 - Policy EN18: Flooding and Sustainable Drainage</p> <p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". We therefore support the reference to sewer flooding in Core Policy 7.</p> <p>Detailed requirements for flood risk policies are highlighted.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS help to mitigate flooding and can also help to improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in Policy wording or supporting text: <i>"It is the responsibility of a developer to make proper provision for</i></p>	<p>Policy CS7 concerns town and local centres rather than flooding and drainage.</p> <p>Guidance on SuDS is provided in the adopted Climate Change and Sustainable Construction SPD 2021 to amplify CS and DMP policies</p> <p>This is a detailed development management issues, rather than a</p>
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	<p><i>surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></p> <p>Policy CS13: Housing Delivery - Growth Options Comments</p> <p>The level of information contained in the current consultation does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.</p> <p>Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.</p>	<p>strategic plan issue, and is currently set out at paragraphs 3.4.11 and 3.4.12 of the Explanation to DMP Policy INF1 Infrastructure</p> <p>Thames Water was consulted and its comments informed the site allocation policies in the DMP.</p>
Transport for London (TfL)	We have reviewed the draft Core Strategy Local Plan Review 2024 and do not have any comments.	

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 1: LOCAL PLAN REVIEW ASSESSMENT

Why you should use this part of the toolkit

The following matrix **will assist you in undertaking a review of policies within your plan to assess whether they need updating.**

The matrix is intended to supplement the [National Planning Policy Framework](#) (NPPF) 2021 (paragraph 33 in particular) and the associated [National Planning Practice Guidance](#) on the review of policies within the plan. Completing the matrix will help you understand which policies may be out of date for the purposes of decision making or where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. This in turn will then help you to focus on whether and to what extent, an update of your policies is required. We would recommend that you undertake this assessment even if your adopted local plan already contains a trigger for review which has already resulted in you knowing that it needs to be updated. This is because there may be other policies within the plan which should be, or would benefit from, being updated.

This, Part 1 of the toolkit deals with local plan review.

Part 2 of the toolkit sets out the content requirements for a local plan as set out in the NPPF.

Part 3 of the toolkit outlines the process requirements for plan preparation set out in legislation and the NPPF.

Part 4 of the toolkit deals with Soundness and Plan Quality issues.

How to use this part of the toolkit

Before using this assessment tool it is important that you first consider your existing plan against the key requirements for the content of local plans which are included in the [Planning and Compulsory Purchase Act 2004 \(as amended\)](#); [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#) and the most up to date [NPPF](#), [PPG](#), **Written Ministerial Statements** and the [National Model Design Code](#).

To help you with this **Part 2 of the toolkit** provides a checklist which sets out the principal requirements for the content and form of local plans against the relevant paragraphs of the [NPPF](#).

Completing **Part 2 of the toolkit** will help you determine the extent to which your current plan does or does not accord with relevant key requirements in national policy. **This will assist you in completing question 1 in the assessment matrix provided below**, and in deciding whether or not you need to update policies in your plan, and to what extent.

To use the matrix, consider each of the statements listed in the “requirements to consider” column against the content of your current plan. You will need to take into consideration policies in all development plan documents that make up your development plan, including any ‘made’ neighbourhood plans and/ or any adopted or emerging Strategic Development Strategy. For each statement decide whether you:
Disagree (on the basis that your plan does not meet the requirement at all);
Agree (on the basis that you are confident that your current plan will meet the requirement)

Some prompts are included to help you think through the issues and support your assessment. You may wish to add to these reflecting on your own context.

Complete all sections of the matrix as objectively and fully as possible. Provide justification for your conclusions with reference to relevant sources of evidence where appropriate. You will need an up to date Authority Monitoring Report, your latest Housing Delivery Test results, 5 year housing land supply position, any local design guides or codes and the latest standard methodology housing needs information. You may also need to rely on or update other sources of evidence but take a proportionate approach to this. It should be noted that any decision not to update any policies in your local plan will need to be clearly evidenced and justified.

How to use the results of this part of the toolkit

The completed assessment can also be used as the basis for, or as evidence to support, any formal decision of the council in accordance with its constitution or in the case of, for example, Joint Planning Committees, the relevant Terms of Reference in relation to the approach to formal decision-making, as to why an update to the local plan is or is not being pursued. This accords with national guidance and supports the principle of openness and transparency of decision making by public bodies.

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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	<p>The plan policies still reflect current national planning policy requirements.</p> <p>PROMPT: As set out above in the introductory text, in providing your answer to this statement consider if the policies in your plan still meet the ‘content’ requirements of the current NPPF, PPG, Written Ministerial Statements and the National Model Design Code (completing Part 2 of the toolkit will help you determine the extent to which the policies in your plan accord with relevant key requirements in national policy).</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <p>The consistency of each local plan core strategy policy with current national policy (NPPF and any relevant Written Ministerial Statements) has been assessed and set out by Core Strategy policy in the Local Plan Core Strategy Review provided at Annex 1 of the March 2024 report to Council.</p> <p>As the Borough’s local plan is not a single Local Plan, but rather its Core Strategy provides the strategic planning policies for the Borough (the detailed development management policies and site allocation policies being subsequently provided in the Development Management Plan 2019), and with the toolkit not having been updated to reflect the 2023 NPPF updates, the Council has found that it is not useful in this situation to complete Part 2 of the PAS Toolkit.</p> <p>The elements of the PAS Toolkit Part 2 that relate to the content of strategic local plans, along with their Dec 2023 NPPF paragraph references, are included in the local plan Review itself, provided at Annex 1.</p> <p>The Council has also adopted has a variety of guidance documents in the past few years which provide detail on application of local plan policies.</p> <p>A draft Design Code SPD for a large area of the centre Borough (the draft of which has been subject to consultation) is based on</p>

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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>the National Design Code.</p> <p>With regards consideration of Section A1 of this Toolkit, we note that the PPG is not policy but guidance and the “soundness” requirement for local plans, as set out in NPPF paragraph 35, is to be consistent with national policy ..”<i>the policies in this Framework and other statements of national planning policy, where relevant</i>”.</p> <p>Whilst the guidance provided in the PPG has been considered, where relevant in the local plan review, this does not necessarily determine whether a policy remains consistent with national policy, but can assist in considering whether it is.</p>
A2.	<p>There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).</p> <p>PROMPT: Look at whether your local housing need figure, using the standard methodology as a starting point, has gone up significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>Consider whether your local housing need figure has gone down significantly (with the measure of significance based on a comparison with the housing requirement set out in your adopted local plan).</p> <p>You will need to consider if there is robust evidence to demonstrate that your current housing requirement is deliverable in terms of market capacity or if it supports, for example, growth strategies such as Housing Deals, new</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Question A2 relates to whether local housing need has changed significantly, and NOT as suggested by the prompt whether local housing need has changed compared to “the housing requirement set out in your adopted local plan”).</p> <p>In the case of RBBC’s Core Strategy, the local housing requirement specified in the plan is a constrained needs figure as referred to in NPPF paragraph 11, footnote 7.</p> <p>NPPF Dec 2023 paragraph 33, and PPG (Plan Making: Plan reviews; Paragraph Reference 61-062-20190315; Revision date: 15 03 2019) both refer to where “housing need” has changed significantly, and NOT the local plan housing requirement.</p> <p>NPPF Paragraph 33 specifies that “Relevant strategic policies will need updating at least once every five years if their applicable</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>strategic infrastructure investment or formal agreements to meet unmet need from neighbouring authority areas.</p>		<p>local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”</p> <p>As “significant” in this context has not been defined, it is for each local authority to decide whether its local housing need has changed significantly.</p> <p>Through the local plan Core Strategy Review 2024, the Council has robustly demonstrated that the Borough’s local housing need has not changed significantly (644 compared to between “600 and 640” referenced in the Core Strategy Inspector’s Report).</p> <p>Even if the uncapped figure of 1,123 were to be used, it is still not significantly different from the 933 anticipated in the later years of the plan period.</p> <p>The Council’s annually published Housing Monitors demonstrates that the current local plan housing requirement is consistently deliverable through the whole of the plan period.</p> <p>As identified in the PAS Local Plan Route Mapper, “failure to deliver new homes is <i>the single matter most likely to trigger the need for a review of policies and update of a local plan. Failure to keep your housing need requirement under regular review, or to achieve delivery of the housing need requirement in an existing local plan can significantly hamper efforts to maintain a plan-led system.</i>”</p> <p>As demonstrated through regular local plan monitoring, summarised in the LP Review, the Council has a good record of housing delivery, cumulatively achieving delivery over the</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>annualised average minimum Local Plan housing requirement.</p> <p>The evidence is that the local plan housing requirement is deliverable.</p>
A3.	<p>You have a 5-year supply of housing land</p> <p>PROMPT: Review your 5-year housing land supply in accordance with national guidance including planning practice guidance and the Housing Delivery Test measurement rule book</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The 2023 Housing Monitor concludes that as at 1 April 2023, the current supply of deliverable sites (which includes a windfall allowance) against its adopted minimum local plan housing requirement is equivalent to 7.80 years, thus significantly exceeding the 5-year requirement.</p> <p>Since the Council adopted its Core Strategy in July 2014, it has consistently maintained a five-year land supply and there have been no appeals allowed based on successful challenges to this position since adoption of the Core Strategy.</p>
A4.	<p>You are meeting housing delivery targets</p> <p>PROMPT: Use the results of your most recent Housing Delivery Test, and if possible, try and forecast the outcome of future Housing Delivery Test findings.</p> <p>Consider whether these have/are likely to trigger the requirement for the development of an action plan or trigger the presumption in favour of sustainable development. Consider the reasons for this and whether you need to review the site allocations that your plan is reliant upon. In doing so you need to make a judgement as to whether updating your local plan will support delivery or whether there are other actions needed which are not dependent on</p>	Agree	<p>Reigate & Banstead Borough's most recent Housing Delivery Test (HDT) performance (19 December 2023) is 168%, which reflects significant delivery above the local plan minimum housing requirement over the past rolling three-year period. As a result, there is no specific action or penalty, such as "action plan or trigger the presumption in favour" required to be taken by the Council.</p> <p>The Council's Housing Monitor, published on line in June each year, sets out a 5-year supply of deliverable sites for the year and also a predicted supply of deliverable sites for the following year, sufficient to meet the Council's housing requirement, as required by DMP Policy MLS1 'Managing Land Supply' applying Core</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	changes to the local plan.		Strategy Policy CS13.
A5.	<p>Your plan policies are on track to deliver other plan objectives including any</p> <p>(i) affordable housing targets including requirements for First Homes; and</p> <p>(ii) commercial floorspace / jobs targets over the remaining plan period.</p> <p>PROMPT: Use (or update) your Authority Monitoring Report to assess delivery.</p>	Agree	<p>The Council's Housing Monitor, published online annually in June confirms that the cumulative target over the plan period to date (1,100 affordable homes at an annualised average of 100 per year) has been exceeded, as to date 1,129 additional affordable homes have been completed within the Borough.</p> <p>The total plan period target for additional affordable homes is 1,500 units between 2012-2027. The Council is on-track to have these provided in the Borough by 2027.</p> <p>Housing Delivery Monitor and Trajectory Plan Monitoring Reigate and Banstead (reigate-banstead.gov.uk)</p> <p>Following the 24 May 2021 Affordable Homes Update WMS , the Council produced a 'First Homes Interim Policy Statement' the policy requirements and local eligibility criteria of which were noted by the Council's Planning Committee (Item 10 of Planning Committee 8th June 2022). (Since referenced in the NPPF December 2023 at paragraph 6 and footnote 36).</p> <p>As a tenure of intermediate affordable housing, the Council has secured First Homes as flats in Redhill town centre, but its application in the Borough is limited by the discounted price cap of £250,000, and other eligibility criteria (first time buyer, cap on income). Given inflation, cost of living increases, and changes in mortgage availability since the national First Homes policy was introduced, as well as reduction in the mortgage products offered, this type of affordable housing has not been delivered to the degree envisaged by central government, but has otherwise by agreement with developers, been provided as other intermediate</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>affordable housing products such as shared ownership.</p> <p>Local plan Core Strategy Policy CS8 sets out the commercial floorspace requirements and outlines how these are being met over the plan period.</p>
<p>A6.</p>	<p>There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>PROMPT: A key employer has shut down or relocated out of the area.</p> <p>Unforeseen events (for example the Covid-19 Pandemic) are impacting upon the delivery of the plan.</p> <p>Up-to-date evidence suggests that jobs growth is likely to be significantly more or less than is currently being planned for.</p> <p>Consider if there is any evidence suggesting that large employment allocations will no longer be required or are no longer likely to be delivered.</p> <p>You will need to consider whether such events impact on assumptions in your adopted local plan which have led to a higher housing requirement than your local housing need assessment indicates.</p> <p>Consider what the consequences could be for your local plan objectives such as the balance of in and out commuting and the resultant impact on proposed transport infrastructure provision (both capacity and viability), air quality or climate change considerations.</p>	<p>Agree</p>	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>As summarised in the local plan Core Strategy review, the employment needs identified within the Core Strategy are to be met predominantly through intensification of existing employment land.</p> <p>The only large employment allocation in the current local plan is in the DMP, as the Core Strategy does not allocate sites</p> <p>Site allocation Policy ‘HOR9: Horley Strategic Business Park’ was allocated to reduce out commuting from Horley to London, provide for a proportion of the Borough’s strategic office need, as well as approximately 75% of Crawley Borough’s unmet business floorspace needs for that plan period.</p> <p>Site allocation HOR9 does not result in an increased need for housing, as it is allocated to reducing commuting from Horley and surrounding areas into London, and to meet much of Crawley Borough’s strategic employment needs.</p> <p>The Council commissioned a study of employment land needs in 2020 to inform the drafting of a Supplementary Planning Document. The ‘<i>Horley Strategic Business Park Economic and Market Assessment</i>’, Feb 2021, by Chilmark Consulting was</p>

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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			published on the Council’s website and is available using this weblink . It considered the impact of Brexit and the 2020/22 pandemic. The delivery of the strategic employment site allocated by the local plan (part 2) Development Management Plan is currently paused due to the Gatwick Airport DCO application.
A7.	<p>There have been no significant changes affecting viability of planned development.</p> <p>PROMPT: You may wish to look at the Building Cost Information Service (BCIS) All-in Tender Price Index, used for the indexation of Community Infrastructure Levy (CIL), or other relevant indices to get a sense of market changes.</p> <p>Consider evidence from recent planning decisions and appeal decisions to determine whether planning policy requirements, including affordable housing, are generally deliverable.</p> <p>Ongoing consultation and engagement with the development industry may highlight any significant challenges to delivery arising from changes in the economic climate.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>We note that in 2020 the CIL indexing changed from the ‘All-in Tender Price Index’ published from time to time by the Building Cost Information Service (BCIS) of the Royal Institution of Chartered Surveyors (RICS) to RICS’s ‘CIL Index’.</p> <p>We have considered the development viability in some detail both in preparation of the Council’s CIL Charging Schedule and in considering the viability of DMP policies and site allocations.</p> <p>Given the record of development in the Borough, particularly of housing development including affordable housing, we are satisfied that, notwithstanding the current higher interest rates and lending, overall changes in development viability since the Core Strategy was examined are within the normal range to be expected across an economic cycle, and are not stifling development.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A8.	<p>Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.</p> <p>PROMPT:</p> <p>Identify which sites are central to the delivery of your spatial strategy. Consider if there is evidence to suggest that lack of progress on these sites (individually or collectively) may prejudice the delivery of housing numbers, key infrastructure or other spatial priorities. Sites may be deemed to be key by virtue of their scale, location or type in addition to the role that may have in delivering any associated infrastructure.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The key Core Strategy policy relating to allocating land for development is Policy CS6. The Core Strategy does not itself allocate sites, but rather sets out (in Policies CS6 and CS8) broad sustainable areas for development, subject to allocations of sites in the subsequent Development Management Plan (DMP).</p> <p>As outlined in the LP CS Review 2024, housing delivery is exceeding the minimum annualised average. There are no key urban sites allocated in the Core Strategy.</p> <p>Monitoring shows that the spatial strategy established in Policy CS6 remains robust, and that the sustainable urban extensions are still not needed to ensure a 5-year housing land supply.</p> <p>As summarised in the annually published Housing Monitor, the sustainable urban extension sites referred to in Policy CS6(3), and allocated by the DMP, do not yet need to be released to deliver the spatial strategy as set out under Policy CS13, to maintain a 5-year housing land supply of deliverable sites and a predicted 5-year supply for the following (and the subsequent Development Management Policy MLS1).</p> <p>The delivery of Horley Strategic Business Park allocated by the local plan (part 2) Development Management Plan Policy HOR9 is currently paused due to the Gatwick Airport DCO application.</p>
A9.	<p>There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Strategic Flood Risk Assessment (SFRA) for the DMP sites</p>

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	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>PROMPT: You may wish to review the indicators or monitoring associated with your Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) / Habitats Regulations Assessment (HRA).</p> <p>Identify if there have been any changes in Flood Risk Zones, including as a result of assessing the effects of climate change.</p> <p>Consider whether there have been any changes in air quality which has resulted in the designation of an Air Quality Management Area(s) or which would result in a likely significant effect on a European designated site which could impact on the ability to deliver housing or employment allocations.</p> <p>Consider whether there have been any changes to Zones of Influence / Impact Risk Zones for European sites and Sites of Special Scientific Interest or new issues in relation to, for example, water quality.</p> <p>Consider whether there have been any new environmental or heritage designations which could impact on the delivery of housing or employment / jobs requirements / targets.</p> <p>Consider any relevant concerns being raised by statutory consultees in your area in relation to the determination of individual planning applications or planning appeals which may impact upon your plan - either now or in the future.</p>		<p>and its allocations ensure that the local plan strategy and its site allocations (in the DMP) are deliverable, and included consideration of climate change effects.</p> <p>Since the start of this plan period in 2012, the Council has designated one new Air Quality Management Area (AQMA), in Hooley – Area 1, in 2013 (Ref: No13 2013). The location of this new AQMA relative to European designated environmental sites and to the amount of development planned, indicate that there is no impact on the delivery of the local plan’s housing or employment allocations. Air quality in the Borough is closely monitored, including in relation to Gatwick Airport’s proposal to use its emergency runway.</p> <p>The Surrey Hills AONB boundary review being undertaken by Natural England has now reached an advanced stage, although as yet there is no date for expected publication and re-drawing of AONB boundary. Statutory and public consultation on the proposed extension areas to the nationally important landscape was completed in June 2023.</p> <p>Natural England is currently considering the responses and determining whether a further statutory and public consultation will be needed if, as a result of comments received, the proposed area is changed. The potential designation of any additional new land as AONB is therefore some time off.</p> <p>The local plan review highlights the Council’s appeal record, and planning decisions where statutory consultees such as the Environment Agency have objected.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A10.	<p>No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.</p> <p>PROMPT:</p> <p>Consider if there have been any new sites that have become available, particularly those within public ownership which, if they were to come forward for development, could have an impact on the spatial strategy or could result in loss of employment and would have a significant effect on the quality of place if no new use were found for them.</p> <p>Consider whether any sites which have now become available within your area or neighbouring areas could contribute towards meeting any previously identified unmet needs.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The site allocations which were made in the 2019 Development Management Plan (DMP) are in accordance with the spatial strategy set out in the 2014 Core Strategy, in particular at Policy CS6 and CS13.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A11.	<p>Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.</p> <p>PROMPT: You may wish to review your Infrastructure Delivery Plan / Infrastructure Funding Statement, along with any periodic updates, the Capital and Investment programmes of your authority or infrastructure delivery partners and any other tool used to monitor and prioritise the need and delivery of infrastructure to support development.</p> <p>Check if there have been any delays in the delivery of critical infrastructure as a result of other processes such as for the Compulsory Purchase of necessary land.</p> <p>Identify whether any funding announcements or decisions have been made which materially impact upon the delivery of key planned infrastructure, and if so, will this impact upon the delivery of the Local Plan.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>One of the Council’s key infrastructure priorities, jointly with Surrey County Council, is the improvement of Three Arch Road junction with the A23 Horley Road, which is close to East Surrey Hospital. The Council is working closely with Surrey County Council to ensure that the project can commence on site according to the agreed timescale. Both Councils are contributing considerably to fund the improvements to this road junction for motorists, pedestrians and cyclists. This project is included in the DMP Infrastructure Schedule (Annex 6).</p> <p>The local plan review document sets out progress on delivery of the key infrastructure against Policy CS8.</p> <p>M23 spur junction improvements are not currently needed as HOR9 site allocation will not be progressed to delivery before the outcome of the Gatwick Northern Runway Development Consent Order (DCO) application is known.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A12.	<p>All policies in the plan are achievable and effective including for the purpose of decision-making.</p> <p>PROMPT: Consider if these are strategic policies or those, such as Development Management policies, which do not necessarily go to the heart of delivering the Plan’s strategy.</p> <p>Identify if there has been a significant increase in appeals that have been allowed and /or appeals related to a specific policy area that suggest a policy or policies should be reviewed.</p> <p>Consider whether there has been feedback from Development Management colleagues, members of the planning committee, or applicants that policies cannot be effectively applied and / or understood.</p>	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>This local plan review is of the Core Strategy and its strategic policies only, not of the part 2 local plan, the Development Management Plan and site allocation policies that help to deliver the CS.</p> <p>As outlined in the LP CS Review 2024, the Council’s appeal record over the plan period to date reflects that the LP CS remains up to date and effective for decision making.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A13.	<p>There are no recent or forthcoming changes to another authority’s development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review emerging and adopted neighbouring authority development plans and their planning context. ● Review any emerging and adopted higher level strategic plans including, where relevant, mayoral/ combined authority Spatial Development Strategies e.g. The London Plan. ● Review any relevant neighbourhood plans ● Consider whether any of the matters highlighted in statements A1- A12 for their plan may impact on your plan - discuss this with the relevant authorities. ● Consider any key topic areas or requests that have arisen through Duty to Cooperate or strategic planning discussions with your neighbours or stakeholders - particularly relating to meeting future development and /or infrastructure needs. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Mole Valley District Council (MVDC) is currently at the later stages of its local plan examination. MVDC responded to our Duty to Co-operate consultation regarding our local plan Core Strategy and advised that it has difficulties in meeting local housing and gypsy and traveller needs in full, and will not be able to accommodate any unmet housing need from R&B Borough, which we accept and understand.</p> <p>Tandridge District Council has recently had its local plan found ‘unsound’ following a protracted local plan examination over some six years. We appreciate that TDC cannot meet our unmet needs for housing or other uses.</p> <p>Crawley Borough Council is also currently at examination with its updated local plan. We continue to work closely with Crawley over Gatwick Airport’s DCO proposal, and appreciate that they cannot meet any of our Borough’s unmet development needs. Gatwick Airport Ltd.’s DCO application is currently at examination.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A14.	<p>There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.</p> <p>PROMPT: In making this assessment you may wish to:</p> <ul style="list-style-type: none"> ● Review any manifesto commitments and review the corporate and business plan. ● Engage with your senior management team and undertake appropriate engagement with senior politicians in your authority. ● Consider other plans or strategies being produced across the Council or by partners which may impact on the appropriateness of your current plan and the strategy that underpins it, for instance, Growth Deals, economic growth plans, local industrial strategies produced by the Local Economic Partnership, housing/ regeneration strategies and so on. 	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council has remained relatively stable politically over the plan period to date. The current Corporate Plan '<i>Reigate & Banstead 2025</i>' dates from 2020, and covers the period to 2025.</p> <p>The Council's Environmental Sustainability Strategy and Action Plan was adopted in 2021, and as set out in the LP CS Review, ever increasing environmental standards and requirements are planned to be considered and addressed in a new Local Plan, for which work was started in early 2023.</p> <p>The Borough was designated as a Growth Point in the SE Plan 2009, on which basis the Core Strategy's housing requirement was partially based.</p> <p>Since then, it has not been designed as a Growth Point, so the trend based approach to identifying local housing needs is not suitable.</p>

	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES	YES/NO (please indicate below)	
A15.	<p>You AGREE with <u>all</u> of the statements above</p> <p><u>If no</u> go to question A16.</p> <p><u>If yes</u>, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>	YES	See section A17 below and the local plan Core Strategy Review, which, if agreed by the Council, will be made available and published on its website.
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies	NO	<p><u>If yes</u>, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and <u>complete Section B below.</u></p> <p>N/A</p>

A17.	<p>Decision: Update plan policies / No need to update plan policies (delete as necessary)</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</p> <p>The reasons for the Council’s conclusion that each of the local plan Core Strategy policies is considered to remain up to date and effective is set out in the Local Plan Core Strategy Review.</p> <p>The conclusion is that as they all remain effective and generally consistent with national policy, none of the Core Strategy policies needs to be updated at this time. The CS policies therefore remain up to date for decision making.</p> <p>This Local Plan Core Strategy Review is to be presented to the Council for approval and adoption before being published on the Council’s website.</p> <p>Other actions that may be required in addition to or in place of an update of plan policies</p> <p>Council Officers are working to support the Council’s position on the Gatwick Airport Development Consent Order (DCO) application and related highways infrastructure works, particularly Riverside Close, and will continue to monitor implications for the Borough.</p> <p>We will also continue to monitor the Surrey Hills AONB boundary review, as our local plan treats AGLV with the same level of protection as AONB until the AONB boundary review is completed and any remaining local landscape areas are re-assessed.</p>			
	B. POLICY UPDATE FACTORS		YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area
	B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.		
	B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a		

	change to this.		
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.		
	You have answered yes to one or more questions above.		You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.
	You have said no to <u>all</u> questions (B1 to B3) above		If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.
—B4	Decision: Full Update of Plan Policies/ Partial Update of Plan Policies (delete as necessary)		
	Reasons for scope of review:		
Date of assessment:	March 2024		
Assessed by:	Tanya Mankoo-Flatt, Principal Policy Development Officer		
Checked by:	Andrew Benson, Head of Planning		
Comments	This toolkit should be read alongside the Council's local plan Core Strategy Review, March 2024, which includes full consideration of consistency of the strategic policies of the Core Strategy with current national policy.		

Annex 4 Indicative local plan timetable

Indicative local plan timetable for a new local plan to be produced under the system introduced by the Levelling Up and Regeneration Act 2023, pending regulations and guidance

Local plan timetable to have effect from the date of its publication

Geographic Scope:

The new Reigate and Banstead Borough local plan will cover the whole of the administrative borough of Reigate and Banstead

Matters:

The new local plan will include a Vision, spatial strategy, strategic policies and design code policies for the whole borough, any detailed local development management or protection policies needed, and site allocations for the Borough.

A Policies map will also be prepared to accompany the new local plan, showing the site allocations, and designation within the Borough.

Date	Stage	Actions
September 2023	Pre-commencement	Continue preparing evidence to inform local plan, including procurement of external specialist support where needed. Present emerging evidence to internal Local Plan Action Group (LPAG). Apply to become Local Plan Pathfinder Authority Produce a working 'Project Programme' including Risk Assessment once Regulations and Guidance setting out detail on the operation of the new local plan system have been published
October 2024	Give "Notice of Start"	Start of "30 month" local plan making process Scope the local plan and the related sustainable environmental assessment (SEA) / Environmental Outcomes including early

		engagement with interested parties Continue preparing evidence
January 2025	Draft a Vision and Strategy consultation document	Draft consultation material and internal reports Continue preparing evidence
March 2025	Gateway 1 Check	To consider the Council's local plan Project Initiation Document (PID) To include proposed local plan scope and proposed methods of engagement and consultation
July 2025	Report to Council seeking authority to consult on draft Vision and Strategy	
August to September 2025	8-week consultation on draft Vision and Strategy	Formal consultation – To seek input and feedback on the vision, aims and objectives of the local plan
October to December 2025	Consider consultation responses	Responses and further evidence to inform drafting of local plan
January 2026	Gateway 2	To consider progress against the PID and engagement
June to September 2026	Report to Council seeking authority to consult on draft Vision and Strategy	Reports to internal Local Plan Action Group (LPAG) and Leaders for comments before Council meeting
October & November 2026	6-week consultation on draft local plan	Formal consultation – on draft LP
December 2026 to March 2027	Consider consultation responses	Reports to internal Local Plan Action Group (LPAG) and Leaders for comments before Council meeting to seek authorisation to submit
April 2027	Gateway 3	To consider procedural and legal requirements, actions against advice provided at Gateways 1 & 2, evidence
July 2027	to Council seeking authority to submit local plan	

August 2027	Submit local plan for independent examination	
August 2027 to February 2028	Examination	
March to June 2028	Finalise Local Plan	
July 2028	Report to Council seeking adoption of new local plan	

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Statement of Community Involvement in Planning (SCI)

March 2024

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1. Introduction

The Council is required to publish a Statement of Community Involvement (SCI), explaining how and when we will involve people who have an interest in the development of the borough, including shaping planning policy, making planning decisions and how to enforce those decision once made.

Our SCI also summarises the basics of how the planning system works, and what local residents and other interested parties can expect if they choose to get involved at any stage of the planning process in Reigate & Banstead.

1.1. Why get involved in planning?

The planning of our towns, villages and countryside is one of the Council's key responsibilities, and it affects us all. From the homes we live in, the places we work, the schools and colleges that our children attend, the open spaces where we relax and stay fit, and the roads and cycleways that we travel on, are all affected by planning.

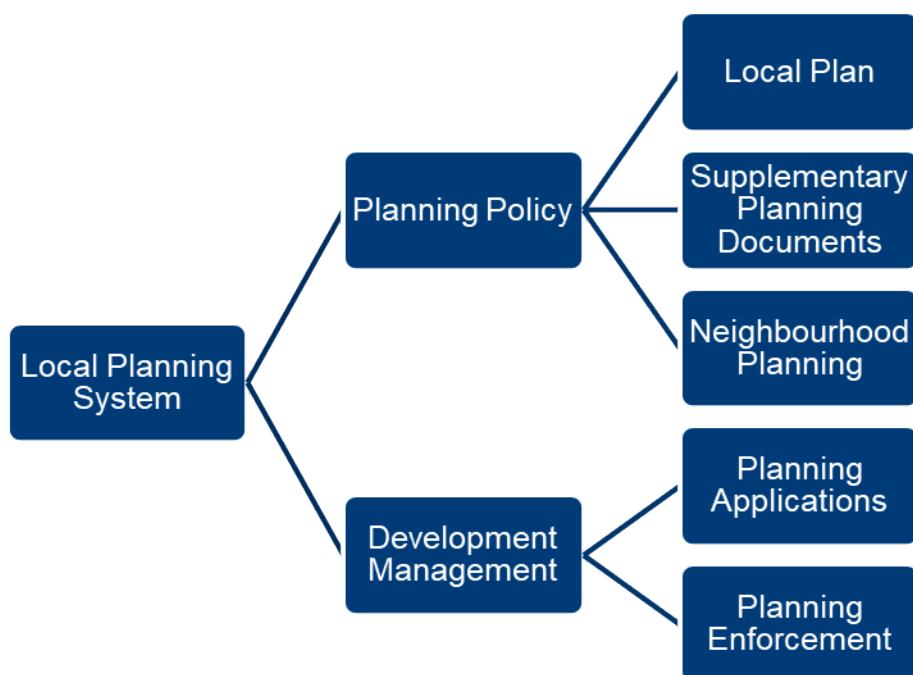
The planning process helps to guide and manage the way in which our borough develops and changes over time, as well as protecting important nature and built heritage from development. Planning ensures that the needs of our residents and businesses are met in the right places at the right times, whilst protecting those parts of the borough that make it an attractive place to live, work and visit.

It is therefore important that local people, businesses and community organisations are able to engage and participate in the planning process, whether that is through our plan-making activities and / or through decision taking on individual planning applications.

1.2. How does the planning system work?

There are two key parts to the local planning system. These are known as 'Planning Policy', which creates the areas' Local Plan and also Supplementary Planning Documents as well as overseeing any Neighbourhood Planning in the area, and 'Development Management', the processing and determining of planning applications and other development applications, as well as enforcing planning decisions (see Figure 1 for details).

Figure 1: Structure of the national planning system



Planning Policy

Planning Policy involves the preparation of a range of planning documents including policy and guidance, which are then used to assess planning applications. Planning policies are shaped by government legislation and guidance along with local evidence. Planning policies, once adopted, are set out in the Reigate & Banstead Local Plan. This Local Plan(s) is a living document and is reviewed and updated when needed to reflect any key changes in legislation or in evidence that may occur.

The Planning Policy team also produce a range of guidance called ‘Supplementary Planning Documents (SPDs)’ that provide guidance on the detailed application of the planning policies within the Local Plan. Topics such as affordable housing, design or conservation of the built environment often require additional information from the Council to set out the context and ensure clarity.

Additionally, the Planning Policy team also oversee Neighbourhood Planning within the borough. This allows local communities to develop localised plans that sit alongside the Local Plan and provide more specific area-based policies that can help shape growth within a specific area.

Development Management

Development Management is responsible for processing and determining planning applications in accordance with the adopted policies for the area, and other relevant “material” planning considerations. To help in planning the most suitable development of the site in question, the Council’s Development Management team can provide pre-application

advice. The Development Management team is also responsible for ensuring that breaches of any planning regulations are investigated and where needed, issues resolved. This is undertaken by the Planning Enforcement team.

Making decisions on planning matters – the role of Council Committees

The operation of the decision making process is governed by the Council's Constitution, which is available at: [Agenda for Constitution on Thursday, 12th October, 2023 | Reigate and Banstead Borough Council \(moderngov.co.uk\)](#).

Council Committees are made up from elected Councillors. Planning Committee plays a key role in decision-making for both planning policies and planning applications.

In accordance with the Council's Constitution, planning policy documents are required to be considered by the Full Council Committee. Decisions to adopt Supplementary Planning Documents are taken by the Council's Executive. In addition, the Council's Overview and Scrutiny Committee, through the LDF Scrutiny Panel, may provide oversight of emerging Local Plan documents.

Non-contentious and minor planning applications can be determined by senior planning officers, who are delegated specific powers from Councillors, through the Council's Constitution. This allows Councillors more time to concentrate on the larger and more complex schemes and ensures that the majority of small applications are dealt with in a timely manner.

All Council Committee meetings are open to the public and the agendas and minutes for each are published on our website. Our Executive, Planning and Overview & Scrutiny Committee meetings and Full Council are webcast – these are advertised in advance on our website and can be viewed at www.reigate-banstead.gov.uk/webcasting.

When applications are presented to Planning Committee, there may be an opportunity for members of the public and applicants to speak in support, or against, the application. All requests to speak at Planning Committee must be made in advance via the Council's online system, except in exceptional circumstances. Planning Committee meetings are public, so any interested parties can attend and watch proceedings, even if they do not wish to speak.

More information and advice about speaking at Planning Committee meetings is available on our website at: [Speaking at planning meetings | Speaking at planning meetings | Reigate and Banstead \(reigate-banstead.gov.uk\)](#).

Other sources of planning information

There are number of organisations who provide independent information and advice on all stages of the planning system. They offer advice on how to be involved effectively and on

how best to put forward your views and comments. These organisations are listed in Appendix 2.

2. What is a 'Statement of Community Involvement'?

A Statement of Community Involvement (SCI) sets out how, when and with who we will engage throughout different stages of the planning process. The Council is required to publish the SCI and to review it at least every five years (a requirement of section 18 of the Planning and Compulsory Purchase Act 2004, as amended). The SCI does not necessarily need to be updated if a review shows it to be up to date. The SCI must be available to view on the Council's website, at its main offices and in any other appropriate places in the borough during normal office hours.

2.1. What does the Government say on community involvement in planning and SCIs?

The National Planning Policy Framework 2023 (NPPF) sets out the Government's planning policies that local planning authorities like Reigate & Banstead must consider when preparing development plans and determining planning and other applications for development.

The NPPF states that the planning system should be easy to understand, and is accessible to all, with a commitment to involving everyone who is interested in their local planning issues. Local plans should *'be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees'* (NPPF, paragraph 16c).

National Planning Practice Guidance (PPG) provides advice on who should be involved in preparing Local plans. It sets out that Councils should *'identify and engage at an early stage with all those who may be interested in the development of content of the Local Plan, including those groups who may be affected by its proposals but who do not play an active part in most consultations'*.

2.2. Monitoring, review and updating the SCI

We will monitor the effectiveness of our approach to consultation and engagement. Where possible, this SCI is flexible so that we can adapt our approach to changes in policy and legislation or to ensure we are able to take advantage of additional, new or innovative approaches to publicity and engagement which might improve our ability to reach the right people at the right time.

In accordance with national statutory requirements of the Town & Country Planning (Local Planning)(England) Amendment Regulations 2017, we will review this SCI at least every five years, and update it when needed to ensure effective community involvement at all stages of the planning process. Whilst there have been no changes to legal requirements, not to guidance about SCIs, this latest update reflects digital / technological and social media changes and evolving good practice.

This document updates the Council's previous SCI that was adopted in 2019.

2.3. Our guiding principles for community involvement in planning

When engaging with the local communities, the Council follows a set of principles which underpin our approach to community involvement in planning. These are:

- Involving stakeholders early in the process
 - ◆ Encouraging and facilitating engagement in the plan-making process so that views can shape and influence policy rather than react to it
 - ◆ Promoting and maximising pre-application involvement in planning applications and pre-application consultation by developers, so that there is meaningful opportunity for community views and aspirations to be factored into the final proposals
- Being open and transparent
 - ◆ Being clear and honest about the purpose and scope of consultations so that stakeholders have a clear understanding of what they can influence from the start
 - ◆ Ensuring that relevant information and consultation materials are made available to stakeholders
 - ◆ Publishing consultation materials that are clear and concise, avoiding unnecessary jargon
- Reaching stakeholders in the right way
 - ◆ Ensuring the consultations reach communities and people that may be affected
 - ◆ Choosing appropriate ways to raise awareness and involve a wide variety of people, including those who are often not heard from, including using on-line videos, and in person drop in events as suited to the issue
 - ◆ Assistance with drafting responses through transcribing for people with limited writing skills and / or whose written English language is insufficient to get their views across on paper
 - ◆ Making best use of digital and social media techniques to maximise the accessibility, ease, speed and reach of consultations
- Providing meaningful feedback
 - ◆ Fully considering the results of consultations and the comments received
 - ◆ Providing appropriate feedback so that it is clear how consultation responses have influenced outcomes, and if not, why
 - ◆ Evaluating and monitoring the effectiveness of consultation exercises and adapting as required

2.4. How does the SCI fit with the Council's engagement outside of planning?

The Council carries out a range of community engagement as part of its work. This goes beyond issues related to planning alone.

Wherever possible, we will also work with other Council departments to ensure that a consistent and coordinated approach is taken to consultation. Where appropriate, joint consultations between departments will be considered to share resources and provide a joined-up approach to engagement.

3. Making Local Plans and Planning Guidance

3.1. What is ‘planning policy’?

Planning policies are key to the ‘plan-led’ planning system of England. Planning decisions must be made in line with adopted Local Plan policies (known as the ‘Development Plan’) unless material considerations indicate otherwise. Development Plan for the borough comprises the local plan(s) and the Minerals and Waste plans prepared by Surrey County Council, which include provision for both within this borough.

The Levelling-up and Regeneration Act 2023 has recently introduced ‘national development management policies’ that will be required to be taken into consideration when decision making. However, at the time of writing this SCI, no date has yet been given for this provision to commence.

The Levelling-up and Regeneration Act 2023 also introduces significant changes to how local plans are prepared, the various stages and timeframes, and the stages at which external involvement from government appointed Inspectors is required. As of mid-March 2024, no details on how this new plan-making system will take effect have been given. When the details have been confirmed, the Council will review this SCI and will update it if required.

The Council is responsible for preparing the planning policy documents which are used to guide the development and determine individual planning applications to deliver sustainable development in their area.

There are two main types of local development documents:

- Local Plans (also referred to as ‘Development Plan Documents’ or DPDs)
- Supplementary Planning Documents (SPDs)

Local Plans or Development Plan Documents (DPDs)

Local Plans (or DPDs) are documents that set out the vision and framework for future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure as well as safeguarding the environment and resources and ensuring good design.

Local Plans set out what development is intended to happen in the area, generally looking 15 years ahead, where and when this will occur and how it will be delivered. This is normally done through a combination of:

- Strategic policies which set out the overall strategy, pattern and amount of development (such as the number of new homes) and infrastructure required as well

as key policies for conserving and enhancing important landscapes, biodiversity and heritage.

- Non-strategic policies that set out more detailed criteria on specific issues, such as design principles or local shops.
- Site allocations which specify the details of sites where development will be supported.

Local planning policies are required to be generally consistent with national planning policy which is set out predominantly in the National Planning Policy Framework (NPPF).

Preparing a Local Plan comprises a number of stages, as required by the planning regulations, the Town and Country Planning (Local Planning)(England) Regulations 2012 – Part 6. Further details can be found in section 3.3.

Supplementary Planning Documents (SPDs)

Supplementary Planning Documents (SPDs) are intended to amplify and to provide guidance on specific Local Plan policies or specific topics.

Preparing an SPD involves several stages, including consultation, however, unlike a Local Plan, an SPD is not subject to examination by a Government Inspector. A summary of the process for preparing a SPD and the opportunities for stakeholder engagement is set out in section 3.3 and Table 2.

Neighbourhood Development Plans and Orders

In addition, local communities can work together to prepare Neighbourhood Plans and Neighbourhood Development Orders to guide development in their local area. More details on these, and the process, engagement and consultation involved in their preparation, is set out in chapter 4.

3.2. Who will we involve and consult in plan-making?

Planning legislation in the Town and Country Planning (Local Planning)(England) Regulations 2012 sets out specific organisations (known as ‘statutory consultees’) which must be consulted on the preparation of Local Plan documents. This includes neighbouring Councils, Surrey County Council, utility companies and Government bodies such as National Highways and Historic England. These consultees will always be notified as part of our plan-making activities.

In addition, through our consultations, we will seek to engage as widely as possible with any other stakeholders who may have a role or interest in shaping future development and growth in the borough. These include:

- Local residents

- Residents' associations and community groups
- Local businesses
- Specific interest groups
- Landowners and developers
- Prescribed bodies for the duty to cooperate in relation to strategic planning issues

If you would like to be kept informed about new planning policy consultations as they occur, you can ask to be added to our consultation database (see Appendix 1 for details).

3.3. When will we involve and consult people in plan making?

Planning legislation sets out the legal 'statutory' stages in the preparation process for each type of planning document. These include when we must formally publish the document for public consultation and for how long. Different documents have different requirements (see Tables 1 & 2 for details).

The timetables for our emerging planning policy documents will be set out in our Local Development Scheme (LDS). The Council publishes and maintains an up-to-date LDS, as legally required to. The LDS provides a useful starting point for stakeholders and the community to understand the likely timing of formal consultation exercises.

The requirements set out in planning legislation will always be met and, in many cases, we will seek to go beyond these minimum requirements in order to promote greater community involvement in plan making. This might include:

- Carrying out additional round(s) of formal consultation to seek focussed views on a new or significant policy or proposal
- Extending the length of a consultation beyond the statutory timeframe
- Carrying out additional, ad hoc activities (over and above the statutory notification and publication requirements)

We will seek to avoid scheduling formal statutory consultations during period when people are likely to have reduced availability to engage (e.g. public holidays). However, this cannot always be avoided. In rare instances, we may consult for an extended period, to ensure stakeholders have adequate opportunity to comment.

The Council maintains a record of current and recent formal consultations. This can be viewed at the [Council's website](#).

Table 1: Summary of stages in preparation of Local Plan or other Development Plan Documents (DPDs)

Stage	Details	Relevant Regulation
Preparation of the evidence base	Targeted early engagement with relevant stakeholders in the preparation and gathering evidence	N/A
Public participation in the scope of the Local Plan (minimum 6 weeks)	As a minimum: Notification to specific and general consultees, and others who have asked to be notified. Publish documents online and make them available at the Council's offices	Regulation 18
Consideration of representations received	May include further evidence gathering and informal engagement as per preparation stage	N/A
Publication of the Local Plan / DPD for public consultation (minimum 6 weeks)	As a minimum: Notification to specific and general consultees, and other who have asked to be notified. Publish documents online and make them available at the Council's offices	Regulation 19
Consideration of representations received	Comments received will be passed onto the Independent Inspector appointed to examine the draft Local Plan.	Regulation 20
Submission of the Local Plan / DPD to the Secretary of State	Following the Regulation 19 public consultation, the draft Local Plan and associated documents will be submitted to the Secretary of State. This stage triggers the independent examination of the document.	Regulation 22

Stage	Details	Relevant Regulation
<p>Examination of the Local Plan / DPD by an Independent Planning Inspector (appointed by the Secretary of State)</p>	<p>Inspector will consider representations received.</p> <p>The Inspector will normally invite those who have expressed an interest to participate in hearing sessions to discuss / debate their issues and concerns.</p> <p>Anyone can attend to observe the hearing but only those invited by the Inspector can participate in discussions.</p> <p>Further public consultation may be carried out as part of the examination if any changes to the Local Plan / DPD arise from the examination (subject to Inspector's advice).</p> <p>At the end of the examination process, the Inspector will issue a report to the Council with recommendations.</p>	<p>Regulation 24</p>
<p>Adoption of the Local Plan / DPD by the Council</p>	<p>Notification to specific and general consultees, and others who have asked to be notified of the intention to adopt.</p> <p>Publish documents online and make them available at the Council's offices.</p>	<p>Regulation 26</p>
<p>Monitoring and review</p>	<p>Targeted engagement with relevant stakeholders may be undertaken as part of monitoring the effectiveness of the document.</p>	<p>N/A</p>

Table 2: Summary of stages in preparation of a Supplementary Planning Document (SPD)

Stage	Details	Relevant Regulation
Preparation of the evidence base	Targeted early engagement with relevant stakeholders in the preparation and gathering of evidence.	N/A
Publication of the SPD for public consultation (minimum 4 weeks)	As a minimum: Notification to specific and general consultees, and others who have asked to be notified. Publish documents online and make them available at the Council's offices.	Regulation 12
Consideration of representations received and drafting of final SPD	May include further evidence gathering and informal engagement as per preparation stage.	N/A
Adoption of the final SPD by the Council	Notification to specific and general consultees, and others who have asked to be notified of the intention to adopt. Publish documents online and make them available at the Council's offices.	Regulation 14

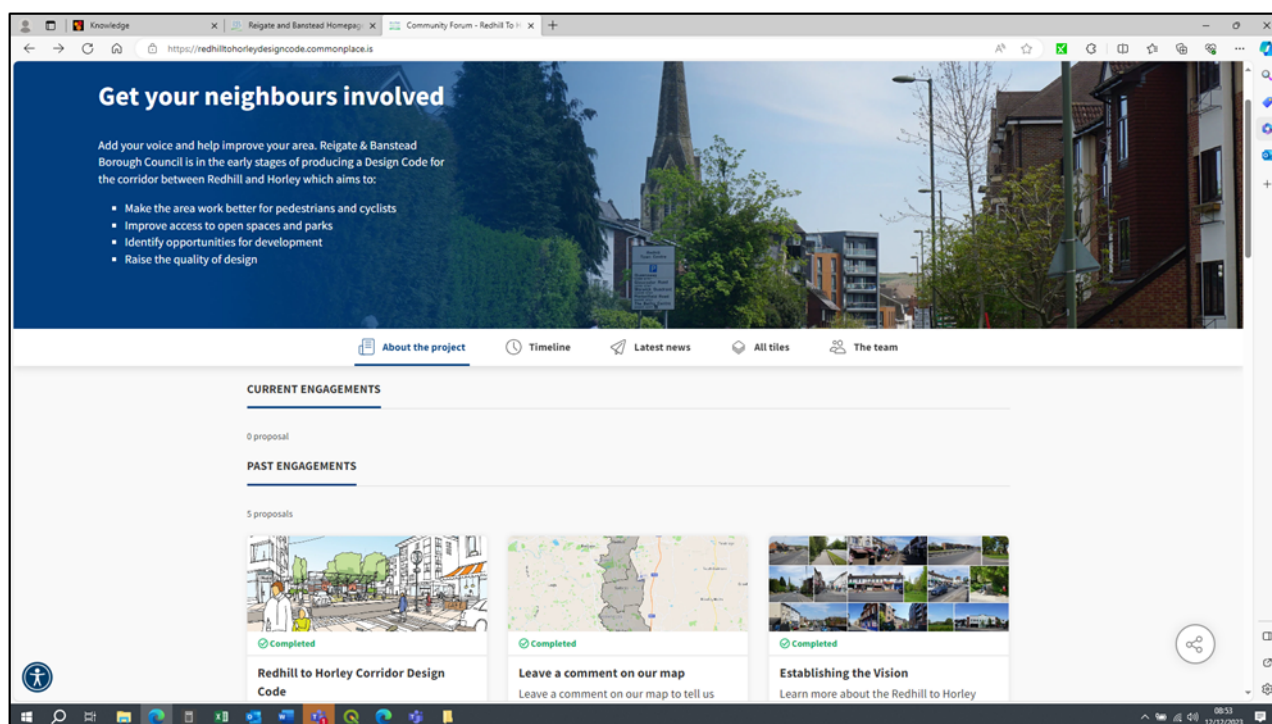
3.4. How will we involve and consult in plan-making?

In addition to formal statutory consultation periods detailed above, we will usually seek to engage and gather views of stakeholders to inform our evidence and data gathering and preparation of a local plan Vision, from which a strategy will emerge.

This early engagement will normally be tailored to understanding particular issues and gathering evidence to support a robust plan. We will publicise opportunities to be involved and provide views on issues and early draft documents as well as directly approach specific groups who may have an interest in a particular issue or geographic area.

The methods we will use include presentations and forums, workshops, drop in events and online surveys using maps and graphics (see example in Figure 2 below) to help describe the issues and draft proposals where suitable. We will seek to ensure the consultations follow the community involvement principles set out in section 2.3.

Figure 2: Example screenshot of one of our online surveys for a new SPD



In addition to specific engagement activities by the Planning Policy team, we may also make use of existing wider Council consultation and engagement activities, such as Residents' Surveys, to gather broader views to inform the early plan-making stages. These will normally be used to understand wider community sentiment on more general issues, rather than to obtain comments and feedback on detailed evidence or technical issues.

We understand that people will have different views at a consultation stage, but our focus is on encouraging early engagement to gain valuable local insight and so that, where possible, we can respond early to community views.

Asking for formal comments and opinions

The key planning legislation for making local plans is The Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations set out the minimum requirements for public participation during statutory consultations on planning policy documents, which, at the time of publishing this SCI, was four weeks for SPDs and six weeks for Local Plans.

As a minimum, we will always:

- Directly notify, by email or letter:
 - ◆ Statutory or general consultees specified in relevant planning legislation; and
 - ◆ Anyone else who has expressed to us a specific interest in being involved as the document develops, including individuals and businesses who have asked to be on our Planning Policy Consultation Database.

- Make documents available for inspection at the Council's main offices and on the Council's website.

In line with the principles in set out in section 2.3, we will aim to go above and beyond this to make consultations, surveys and supporting evidence transparent and accessible to all. The various methods which we might use to raise awareness and maximise opportunities for people to engage are set out below. These will be chosen on case-by-case basis.

We encourage all parties to make comments electronically where possible and we will normally publish online surveys or email response forms to enable this. We also accept comments and representations by email or post. Any party making comments must provide a name and address for comments to be valid. During formal statutory consultation exercises, it is important that comments are received before the close of the consultation, otherwise they are unlikely to be accepted.

Methods of publicity and keeping communities informed

Reigate & Banstead Borough Council website

Progress on our planning documents and information about current consultations will be publicised on the Council's website. We will also publish documents, including background evidence and response forms, which will be made available to download during the consultation process. Specific webpages on the Council's website, or even potentially a dedicated microsite, will be available to host the Council's local plan examinations, as recommended by government guidance.

Direct notifications

We will send emails and letters directly to specialist organisations who are termed 'statutory bodies', community and residents' groups and other groups and stakeholders, and people (including local residents) who are registered on the Council's Planning Policy Consultation database, to notify them about a particular stage of plan making or consultation. In some circumstances, targeted or borough-wide 'mailshots' may be used to raise awareness of consultations. If you want to receive these emails or letters, please make sure to register (see Appendix 1 for details).

Social media

Posts and publicity regarding formal consultation events may be promoted on the Council's Facebook page, X feed (formerly Twitter), LinkedIn and Instagram profiles (See Appendix 1 for details). Video summarising the planning documents we are inviting comments on may be summarised on the Council's YouTube channel.

Borough news

Where possible (and subject to lead-in times) we may provide updates on Local Plan work in the Borough News magazine that is distributed to homes across the borough twice a year and available electronically on our website.

E-newsletters

Various Council services publish electronic newsletter periodically or when needed to share news and information. This includes the Council's 'Planning Policy Newsletter' (see example in Figure 3 below), published from time to time, when needed, and the 'E-business Newsletter', which is emailed to local businesses periodically. These electronic newsletters will be used, where appropriate, to help promote planning consultations and engagement exercises.

Figure 3: Example of our Planning Policy Newsletter



Local media

Media releases to local newspapers, radio stations, online media and to hyperlocal sites and newsletters may be issued to promote consultations and latest news.

Leaflets, posters and flyers

These may be distributed (including to postal addresses) and displayed to promote consultations and summarise information on consultations. Information may also be circulated to Parish / Town Councils and residents' associations for display on community notice boards or in community newsletters, and at the six libraries in the borough. Including QR codes on posters and leaflets that people can quickly and easily scan will make it easier for many to find out more and to give their views if they have limited time for attending events.

Promotion by other departments – ‘word of mouth’

We may share information and briefings regarding emerging planning policy documents amongst other Council departments so that they can promote and publicise them through their existing networks. This might include through Business Engagement, Community Development or Regeneration.

Presentations, workshops and drop-in events

We may give presentations to appropriate groups, organisations and stakeholders to target particular people in the community who may be interested in how proposals affect a particular issue or local area or hold drop in events in well-used locations such as leisure centres or large supermarkets to reach a wider audience. On-line meetings with correspondence by email can assist those who may not have the time nor health to attend in-person workshop discussion events.

Councillor seminars and briefings

These may help to provide information about the Local Plan process to Ward Councillors and elected members to support them in leading on raising awareness and engaging with their local residents and their community.

Digital methods of involving people and collecting feedback

Surveys, questionnaires and feedback forms

These may be used to canvass views on emerging planning documents. Response forms will normally be made available to capture comments at formal statutory consultation stages.

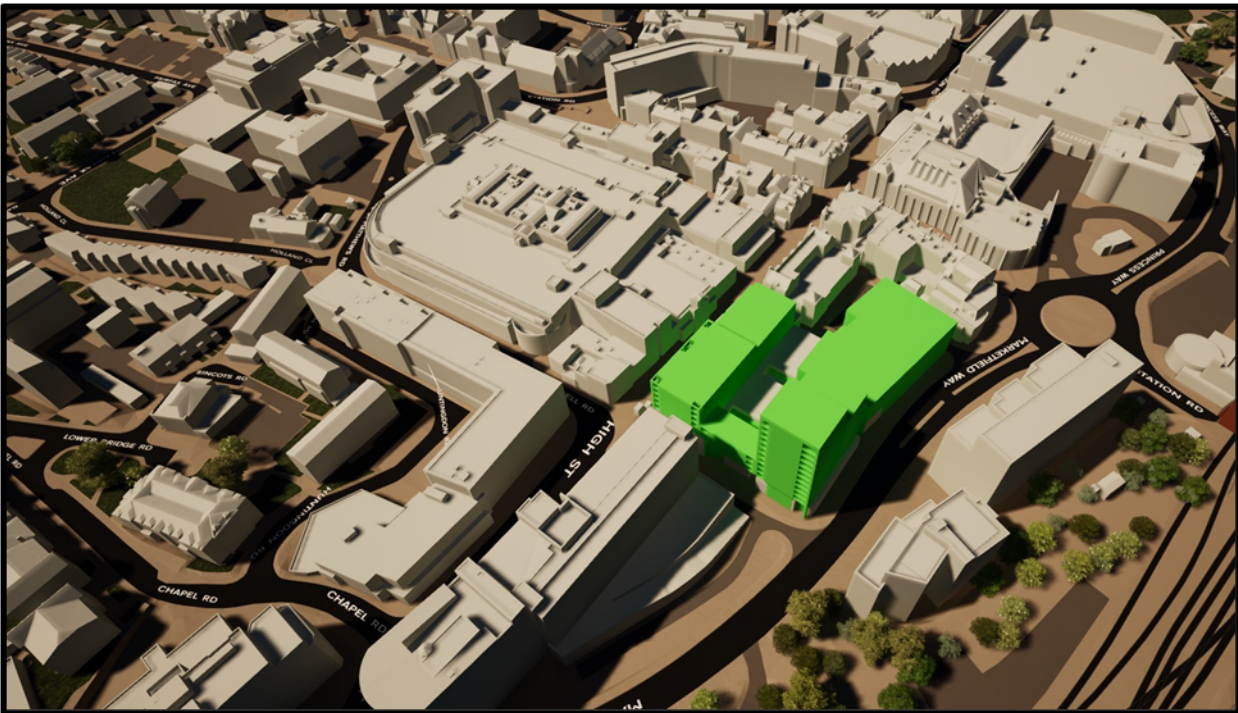
On-line surveys using specialist software such as ‘Commonplace’

We may use this software or similar, where suited to the consultation, to present the information, including maps and photographs, and to collect feedback on issues and proposals. These will be accessible from the Council's website.

Use of 'virtual' 3D models

The Council has worked with specialist consultants to design and create a 'virtual' 3 Dimensional (3D) model of the A25 Redhill to Horley area. We will use this 3D computer model to present visualisations of potential site allocation developments and major planning applications to be considered by planning committee. See image of Redhill Town centre highlighting the recently built development of 'The Rise' in Figure 4 below. In future, as technology and resourcing permits, this may be rolled out to cover other parts of the borough.

Figure 4: 3D model of Redhill town centre



Workshops and focus groups

Opportunities for discussions or specific topics and documents in groups, potentially supported by presentations and other visual material. These may take the form of 'Planning for Real' exercises. Workshops may particularly be used at earlier stages of preparation or to focus on exploring specific topics.

Exhibitions

We will use public exhibitions and displays to publicise emerging planning policy and guidance documents to local communities and provide further information and to informally collect views. Exhibitions may be staffed by planning officers at times, to enable communities to ask questions and to provide informal feedback to Council planning officers. Materials may be made available online to enable those who cannot attend exhibitions in person to leave comments. Suitable locations may include areas with pedestrian traffic, such as shopping, leisure or community centres.

Figure 5: Example of our public engagement event invitation



Council meetings

Where appropriate and / or where required by the Council’s Constitution or Statutory Acts, we will take our emerging plans to relevant Council meetings for feedback and approval.

Improving access to our consultation material aiming reach to all communities, including those ‘rarely heard from’

Whilst planning affects us all, it can also be a complex and technical subject and the evidence supporting planning policies can often be lengthy. This can be a barrier to people getting involved.

We will make every effort to ensure that our consultation materials are clear and easy to understand and that key issues and significant or potentially controversial proposals can be easily identified. We will aim to make our planning documents as visual as possible to present the spatial planning proposals in an easy to interpret visual style, including where possible, use of maps, infographics, charts and photographs. This will include producing

leaflets, briefing notes and non-technical summaries alongside the formal consultation documents, to help highlight the most important information.

Within our communities, there are individuals and groups who may have greater difficulty accessing consultations or who may be less likely to make their views known. These groups, sometimes known as 'rarely heard' may nonetheless be able to offer important and valuable insight to inform our planning policies. These groups may change over time, but can include:

- People of working age who, due to work and family commitments, have very limited free time in which to involve themselves in wider issues (the time-limited)
- Carers who may have insufficient time to engage in planning issues that could affect them and / or their dependents
- People of limited mobility, through either age or disability
- People with sight or hearing impairment
- People who are not fluent in English
- People who are not able to read and / or write well enough to participate in traditional types of written planning consultations
- People without a fixed address
- People of school age who, because of their age, may be less likely to be part of formal residents or interest organisations

When planning consultation on local plans or supplementary planning documents, we will carefully consider ways to maximise opportunities to engage with 'rarely heard' groups and overcome barriers to participation. Measures which may be used could include:

- Using alternative methods to written or text-based consultation, such as face-to-face meetings or workshops, or drop-in sessions/exhibitions and ensuring that these are held at appropriate times or day/days of the week and in appropriate, accessible locations.
- Maximising the availability, flexibility and reach of online consultation opportunities for those unable to access Council services or offices during normal working hours. This might include providing shorter online or interactive surveys for those who are 'time poor', online video summaries of key issues, and publicising consultations effectively using a wide range of social media.
- Making documents available, on request, in different languages and accessible formats (e.g. large print or audio versions), ensuring that online materials are screen reader friendly and that video content has appropriate subtitles.
- Utilising Parish / Town Councils, other local groups and associations (where they exist) to assist in increasing awareness at local level, particularly as they have existing communication networks within their areas.
- Working with other departments, such as our Community Development team, in order to maximise outreach during consultations.

Our ‘Duty to Cooperate’

The ‘duty to cooperate’ is a legal duty Section 110 of Localism Act 2011 and 33A of the Planning and Compulsory Purchase Act 2004, which requires the Council to engage constructively, actively and on an on-going basis with neighbouring authorities and other (prescribed) public bodies to tackle ‘larger than local’ issues. This includes challenges such as meeting needs, delivering infrastructure or protecting important landscapes. The duty is intended to make Local Plans more effective.

At the early stages of document preparation, the Council will work with the duty to cooperate bodies to understand which aspects of the plan they wish to be engaged with and how. This may also provide an opportunity for joint working and establishing a shared evidence base.

With specific reference to the duty to cooperate, methods of engagement to be applied throughout the plan making process will include the following:

- Notification emails / letters;
- Information requests / exchange of data;
- Meetings, discussions and workshops, including through existing joint working arrangements such as Surrey Planning Officers Association and Gatwick Diamond;
- Written agreements / statements of common ground

3.5. What will we do with your comments on our planning policy documents?

All formal comments received as part of a planning policy consultation process will be collated, analysed and taken into account in the decisions made by and on behalf of the Council.

The Council will not normally respond to comments and representations received on an individual basis. In exceptional circumstances, we may contact a person or organisation who made the comments in order to ensure we fully understand their views and / or specific issues they raise.

Comments will be reviewed and considered by Council officers. Where appropriate, the Council may propose changes to the draft document or may take some other action (such as reviewing / updating evidence) to address points raised during the consultation. However, there may also be instances where the Council considers that it is not appropriate to amend the plan to accommodate the views of a respondent, for example if a proposed change is contrary to national planning policy.

The outcomes of any formal consultation will be published on the Council’s website. A Statement of Consultation will be prepared for each statutory consultation stage, setting out

the comments received (usually as a summary) and the Council's response to those comments. It will also set out if and how the issues were addressed.

In the case of Local Plans or other DPDs, the respondent may be given the opportunity to convey their views to an independent Planning Inspector at an Examination into the soundness of the plan either in writing or by appearing at a hearing.

For all formal comments received during a consultation period, the Council will:

- Record the comments and points raised;
- Provide acknowledgement of receipt (if electronic) or if otherwise requested by the respondent;
- Collate and make available any comments;
- Notify anyone who has responded to a consultation of the next statutory stage;
- When submitting a document to the Secretary of State, notify those people who have requested to be notified of submission, by email or letter;
- Send the Planning Inspector those comments received during the regulation 19 consultation for a Development Plan Document.

We cannot accept confidential, anonymous or late comments in response to formal statutory consultations. In accordance with the Data Protection Act 2018, we will not publish personal data (your name and anything that could be used to identify you personally) or confidential information provided to us as part of comments. All respondents are also encouraged to ensure that representations only contain material that they are happy to be made publicly available.

We also reserve the right not to publish any comments, or parts of comments, that are not considered suitable for public view, including comments that are offensive, personal or defamatory.

3.6. Making adopted documents available

Adopted Local Plan documents, SPDs and other documents such as the Local Development Scheme and Statement of Community Involvement, will be published on the Council's website.

Copies will also be made available for inspection at the Council's main offices and libraries. Paper copies will also be available to purchase (in order to recover printing costs and postage costs where needed).

4. Neighbourhood Planning

4.1. What is Neighbourhood Planning?

Neighbourhood planning was introduced by the [Localism Act 2011](#), and consists of a series of powers to enable communities to plan their local area by deciding how it should be developed, where and when, and what its development should look like. Neighbourhood planning can be undertaken by a local parish or town council, or by specially designated Neighbourhood Forum (a neighbourhood planning body), to develop a shared vision for the future of the places where they live and work. Neighbourhood planning includes a number of tools including Neighbourhood Development Plan, a Neighbourhood Development Order or Community Right to Build Order.

Neighbourhood Development Plans (NDPs)

Neighbourhood Development Plans, or simply Neighbourhood Plans (NPs), enable designated communities to establish and deliver a vision for the area, to set planning policies and propose new uses and allocations for development of land in their area. NPs can be very simple or can go into considerable detail. Neighbourhood Plans must pass through independent examination and a local referendum of people on the electoral register. If a majority agreed that the Council should use the neighbourhood plan to decide planning application in the neighbourhood area, the plan will become part of the statutory (legal) development plan for the area, and are taken into account in determining planning applications in that area.

National policy makes clear that Neighbourhood Plans are intended to be a positive tool to support growth. Specifically, it states that Neighbourhood Plans cannot promote less development that is set out in the Council's Local Plan, nor can they be used to undermine the strategic policies of the Council or block development which is already part of the area's adopted Local Plan. They can, however, promote more growth or influence where it goes and what it will look like.

Neighbourhood Development Orders or Community Right to Build Order

If a community wished to simplify the process for allowing development, it can also produce a Neighbourhood Development Order or a Community Right to Build Order. These can be instead of, or in conjunction with, a Neighbourhood Plan and can be used to grant planning permission (full or outline) for certain types of development in specified areas. Such orders, however, cannot remove the need for other permissions, such as Listed Building or Conservation Area consent.

4.2. What is the process for preparing a Neighbourhood Plan?

Neighbourhood Planning is either taken forward by Town / Parish Councils, or in areas without Parish Council by ‘Neighbourhood Forums’ (formed by community groups, including local residents).

The process of preparing a Plan or Order is designed to be led by the community. As such, whilst preparing their draft Neighbourhood Plan, the neighbourhood planning body is responsible for carrying out public consultation and engaging with the local community and wider stakeholders. If you live or work within an area developing a Neighbourhood Plan, there will therefore be opportunities to get involved and influence the content of the emerging Plan. The key stages in the preparation of a Neighbourhood Plan, including the various consultation opportunities to have your say, are summarised below in Table 3.

Once a draft of the Neighbourhood Plan has been completed, it must be submitted to the Council. At that point, the Council will carry out a period of formal consultation and then submit the plan for independent examination. The Council will also organise the referendum following the examination and the subsequent adoption. These processes will be carried out in accordance with the relevant Regulations.

The Council will update details of the progress of each Neighbourhood Plan or Order on its website. It will also publish examiners’ reports and any associated decision notices.

Table 3: Summary of stages and responsibilities in the preparation and adoption of a Neighbourhood Plan

Stage	Details	Relevant Regulation
Early engagement	<p>Informal community consultation undertaken by the local community to understand appetite, aims and ambitions from neighbourhood planning.</p> <p>Community seeks advice from the Borough Council as to whether NP is the right way forward to address the community’s aspirations.</p> <p>Informal community consultation on the boundaries of any prospective neighbourhood planning area undertaken by the local community.</p>	N/A

Stage	Details	Relevant Regulation
Neighbourhood Forum / Neighbourhood Area application	Community makes an application to be designated as a Neighbourhood Forum (if unparished) or to designate a Neighbourhood Area. First steps in progressing with a Neighbourhood Plan.	Regulations 5 & 8
Designation of Neighbourhood Forum or Neighbourhood Area	Minimum 6 weeks consultation undertaken by the Borough Council. As a minimum: Publish details of application online along with information about how interested parties may make representations; however, additional targeted notifications and publicity in the relevant area may also be undertaken. Borough Council published details of decision to designate (or not) online.	Regulations 6, 7, 9 & 10
Preparation stage	Local community gathers evidence to inform and prepare the Neighbourhood Plan. Engagement with, and surveys of, the local community, relevant stakeholders should form a key part of this evidence gathering. Draft Neighbourhood Plan prepared by local community.	N/A
Pre-submission consultation on Draft Plan	Minimum 6 weeks consultation undertaken by the neighbourhood planning body. As a minimum: Notify and send a copy to the Borough Council. Notify specific consultation bodies in Neighbourhood Planning Regs. Publicise the plan in a manner which is likely to bring it to the attention of people who live, work or carry on business in the area.	Regulation 14

Stage	Details	Relevant Regulation
Finalise and submit Draft Plan	<p>Prepare consultation statement summarising responses received.</p> <p>May include further evidence gathering and informal engagement as per preparation stage.</p> <p>Prepare formal documentation including basic conditions statement and any necessary environmental assessments.</p>	Regulation 15
Public consultation on Submission Plan	<p>Minimum 6 weeks consultation undertaken by the Borough Council.</p> <p>As a minimum:</p> <p>Notify specific consultation bodies in Neighbourhood Planning Regs and those who have responded previously.</p> <p>Publicise the plan in a manner which is likely to bring it to the attention of people who live, work or carry on business in the area.</p>	Regulation 16
Submission of Neighbourhood Plan for independent examination	<p>The Draft Plan is submitted for independent examination.</p>	Regulation 17
Examination of Neighbourhood Plan by an independent examiner (appointed by the Council)	<p>Examiner will consider representations received.</p> <p>Examiner will assess whether further public consultation may be carried out as part of the examination if any changes to the Neighbourhood Plan / DPD arise from the examination (subject to Inspector's advice).</p> <p>At the end of the examination process, the Inspector will issue a report to the Council with recommendations.</p>	Regulation 18

Stage	Details	Relevant Regulation
Local Referendum	Organised and funded by the Borough Council. Vote held in the neighbourhood area only, of people on the electoral register. If more than 50% of those voting are in favour, the plan can be “made” / adopted.	Neighbourhood Planning (Referendums) Regulations 2012
Borough Council “makes” (adopts) Neighbourhood Plan	Publicise adoption online and notify any persons who asked to be notified.	Regulation 19

4.3. What support is available to help groups to prepare a Neighbourhood Plan?

Support from the Borough Council

Whilst the local community is responsible for preparing the plan, the Council will provide appropriate on-going advice and support throughout the process.

The Neighbourhood Planning Act 2017 introduced a new requirement for Statements of Community Involvement (SCIs) to set out how the Local Planning Authority will support groups undertaking neighbourhood plans.

As a starting point, the Council will nominate a member of the Planning Policy team to act as the main point of contact between the Neighbourhood Planning Group and the Council.

Support and guidance will be made available in several forms, with the emphasis on helping the community to develop their own knowledge and skills to prepare the plan, rather than direct involvement by the Council. This approach will help to maximise the independence and local ownership of the Plan. Support available may, depending upon the requirements of the community, include:

- Initial advice or seminars regarding the process for preparing a Plan or Order, including the respective roles of the Council and neighbourhood planning body.
- Initial support in scoping the matters which can / cannot be addressed through the Plan aspirations / objectives of the community.
- Sharing existing evidence documents, data and intelligence held by the Council which may be relevant to the area; and ‘signposting’ to other useful sources of data such as the Office for National Statistics, etc.

- Providing guidance (as required) on project management issues such as timetabling (including sharing any template tools), writing effective specifications / briefs for consultancy support and undertaking consultation / engagement events.
- Providing advice on relevant legislative or regulatory requirements, including Strategic Environmental Appraisal, and on any relevant case-law.
- Practical assistance such as GIS mapping (where appropriate and resources permit)
- Sharing examples of best practice from plans elsewhere.
- ‘Signposting’ to other sources of support (including financial) and training and supporting the community in making funding applications as appropriate.
- Providing informal advice on ensuring conformity with existing national / local policy and ensuring policies / site allocations are fit for purpose and deliverable.
- Responding, on a formal basis, to specific consultations on the emerging and draft Plan or Order
- Facilitating access to other teams / departments within the Council, or in partner organisations, if specialist input is required.
- Advice on the referendum process, including campaigning.

Town and Parish Councils or any Neighbourhood Forums will be strongly encouraged to keep their own websites up to date and assist by making sure documents are available locally and providing appropriate local publicity.

What other sources of advice, support and guidance exist?

There is a range of valuable, independent advice and guidance for communities and groups preparing neighbourhood plans, including:

- Planning Practice Guidance: [Neighbourhood planning - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- Planning Aid: <https://www.planningaid.co.uk/hc/en-us/articles/203195361-How-does-a-Neighbourhood-Plan-fit-in-with-the-Local-Plan>
- Neighbourhood Planning support website ‘Locality’ <https://locality.org.uk/neighbourhood-planning> offers direct support to Neighbourhood Planning groups to help with preparing Neighbourhood Plans, including in the form of financial grants and technical support. This includes a ‘Neighbourhood Plans Road Map’ available at https://neighbourhoodplanning.org/wp-content/uploads/NP_Roadmap_online_full.pdf
- Planning Help – Neighbourhood Plans (by Council for the Protection of Rural England) [How to shape where you live: a guide to neighbourhood planning - CPRE](#)

5. Commenting on planning applications

A planning application is a means by which someone applies for permission from the Council to develop land or existing buildings, including changing their use. The Council is responsible for most planning decisions that are made throughout the borough, although in some limited instances (such as minerals and waste proposals), the County Council makes the decision.

The Council determines approximately 2,000 planning (and related) applications a year, ranging from household extensions and fences to major new housing estates and business premises. These planning decisions shape the nature of the areas where people live, work and spend their leisure time.

5.1. Types of planning applications

There are two main types of planning application – applications for full planning permission and applications for outline planning permission.

In addition to planning applications, the Council also processes a wide range of other applications relating to development:

- Approval of reserved matters
- Discharges of condition
- Amendments to proposals that already have planning permission
- Lawful development certificates
- Prior notifications and approvals for some permitted development rights
- Non-planning consents (such as advertisement consent, listed building consents and consents required under a Tree Preservation Order)
- Environment Impact Assessment (EIA) / Environmental Outcomes (EO) screening & scoping requests

5.2. Involvement at the pre-application stage

National policy guides all parties to take maximum advantage of the pre-application stage to improve the efficiency, effectiveness and outcomes of the planning process. The Council strongly encourages applicants to carry out early engagement with both the Council and the local community before submitting a planning application, especially for development proposals where the application of planning policies might not be straightforward. The pre-application involvement of the local planning authority, and key stakeholder organisations and the public should be proportionate to the size and type of development being proposed.

Involvement in the pre-application process provides an important opportunity to make a real difference to proposals, as well as avoiding unnecessary delays and costs for all parties.

Pre-application advice

Early discussion of a proposal with the Council in the form of a pre-application discussion can:

- Help identify key opportunities and challenges associated with a particular site
- Help the applicant to understand how planning policies and other requirements may affect their proposal
- Verify the information required to be submitted with the application
- Reduce the likelihood of submitting invalid applications
- Identify the need for specialist involvement
- Raise the quality of development

General planning advice is also available from the Duty Planner, a telephone service which currently (as of March 2024 but may be subject to change and review according to future demand and resources) operates between 10am and 11.30am Monday to Friday. However, the extent of advice which the duty planner can provide is limited and we are unable to advice on specific proposals or the potential of a particular site via this service.

For specific schemes / proposals, the Council offers a formal pre-application advice service, providing either written advice or an opportunity to meet with a designated Planning Officer to discuss proposals. Further information above the pre-application process, including the necessary forms and fees information is available at: [Pre-application planning advice | Pre-application planning advice | Reigate and Banstead \(reigate-banstead.gov.uk\)](#).

Sometimes, these discussions will have to be kept confidential due to commercial sensitivity.

Pre-application community consultation

The purpose of community engagement at the pre-application stage is to help identify and address issues so that any subsequent planning application is processed more quickly and the determination process is smoother. In particular, community engagement by applicants can:

- Identify and address any issues that may be considered in any formal application
- Inform Members and the public of a development proposal at an early stage in the process
- Inform planning officer's pre-application discussions with the developer
- Enable the developer to shape an application at the outset to respond to community issues and help to reduce local opposition

We strongly encourage applicants or developers, particularly on major schemes, to consult and engage with the local community before submitting planning applications which are likely to generate public interest. Such consultation should be accessible and clear to the whole community.

Pre-application consultation provides an opportunity for applicants and developers to find out the views of local residents about their development proposals and allows the local community to make suggestions which can then be taken into account by the developer in finalising their planning application.

In most cases, the Council expects applicants to carry out their own pre-application consultation. This should be effective in bringing draft proposals to the attention of the public, the local Town or Parish Council and other affected parties and provide opportunities for them to make comments. The extent of public engagement prior to application should reflect the scale and nature of the proposals. In all cases, the Council strongly encourages applicants to discuss their emerging proposals on a one to one basis with direct neighbours.

For larger applications, including 'major' developments of over 10 new homes or 1ha of land, more extensive engagement would be expected. Effective ways of doing this include public exhibitions, workshops and other forums providing specific opportunities for comments to be made. Discussions with Parish / Town Councils, local residents' associations and with elected Councillors are also encouraged for larger proposals.

The Council will expect applicants to submit details of the pre-application consultation they have undertaken as well as an explanation on how the responses have been considered alongside their planning application. The Council will consider this information prior to making a decision.

Planning Performance Agreements (PPAs)

A Planning Performance Agreement (PPA) is a tool that the Council and applicants can use to agree timescales, actions and resources for handling particular applications. They can be used on most types of development but are particularly useful for larger, more complex planning applications.

PPAs typically cover the pre-application and application stages and provide an opportunity to:

- Establish a programme of bespoke pre-application advice, normally through a series of meetings, to identify and discuss key issues and to inform the design development of a proposal in the build up to submission of an application.
- Identify the resources and skills to be involved at the pre-application and application stage (normally including a dedicated case officer).
- Set out a clear and agreed timescale for reaching a decision once it is submitted.

In order for all parties to gain maximum benefit from a PPA, it is essential that they facilitate close engagement between the Council, developers, key consultees and the local community. The PPA will provide an opportunity for identifying the approach to community engagement and who should be involved.

Developers will be expected to cover the costs of the PPA, which will be in addition to any subsequent planning application fee for the proposed development.

5.3. Who will we consult regarding planning applications

Once a planning application is submitted, planning legislation sets out the statutory publicity requirements for different types of planning applications.

The method of publicity depends upon the type and scale of the development proposed in the application. Members of the public and stakeholder organisations have 21 days from the start of the consultation (excluding public holidays) to make comments, after which a decision can be made on the application. The easiest and quickest way to make your comments on an application is online, through the Planning Register. Once you have searched for and viewed the application, use the “Comment on this Application” link to register your comments. You can also provide comments by post.

The method of publicity and consultation for applications include:

- **Neighbour notifications** – we individually notify, by letter, all those properties (residential or non-residential) directly bordering and abutting the boundary of the application site.
- **Site notices** – if a site notice is a statutory requirement, it would be posted in at least one place on or near to the land that the application relates to. Every effort will be made to post site notices in a location which is visible to the general public and those passing the site. If the site is large, or if its geography is such that it may be accessed or appreciated from several roads, more than one site notice may be posted. This will be at the discretion of the Planning Officer. In exceptional circumstances, where the ownership of land adjoining an application site is uncertain, a site notice may also be posted at the discretion of the Planning Officer. The site notice will set out how to comment on the application and any deadlines.
- **Press notice – certain applications are advertised through a public notice in the local press.**
- **Online planning register** - all applications, and their associated documentation, are also made available to view on the Council’s website via the online planning register. You can use the register to:
 - ◆ Follow the progress of an application
 - ◆ View associated plans and documents
 - ◆ Make comments on an application
 - ◆ View the application report and decision notice
 - ◆ See if appeals have been lodged and any decisions made
 - ◆ See recent planning history and property details, including maps and constraints

Our website enables for residents and stakeholders to register and carry out their own planning searches. This service is a helpful way to keep informed of applications for development in the Borough that may affect you. The Council records can be searched by criteria such as type of application reference number, ward, status (active, determined, appealed) or applications within a defined geographical area, and offers the option for individuals to be notified by email of any new applications meeting these criteria. Guidance notes are available on the Council's website to explain how to use this. Further information is available at: [Weekly list of planning applications | Weekly list of planning applications | Reigate and Banstead \(reigate-banstead.gov.uk\)](http://reigate-banstead.gov.uk)

As well as consulting the local community, we will also consult a range of internal and external consultees as part of the application process. Some of these consultees are specified in legislation, however we may also consult others such as the County Highway Authority on transport matters or specialists in environmental health, trees, ecology and heritage conservation, depending upon the nature of the application.

The consultation and notification methods we will use for different types of application are summarised in Table 4.

Table 4: Summary of planning application consultation methods

Type of application	Site notice	Neighbour notification letter	Press notice	Online planning register
Major development (10+ homes or 1,000sqm or more) Includes full, outline and minor material amendment applications (section 73)	✓	✓	✓	✓
Minor development (less than 10 homes or 1,000sqm)*		✓		✓
Householder developments		✓		✓
Certificate of Lawfulness for existing use / development		✓		✓
Certificate of Lawfulness for proposed use / development		✓		✓

Type of application	Site notice	Neighbour notification letter	Press notice	Online planning register
Permitted Development prior notifications and approvals	✓	✓		✓

Additional publicity requirements may be triggered to meet specific legislative requirements if a planning application gives rise to any of the specific issues identified (see Table 5 for details).

Table 5: Summary of consultation requirements related to specific issues

Specific issue	Site notice	Neighbour notification letter	Press notice	Online planning register
Development accompanied by an Environmental Statement (under EIA or EOs Regulations) <i>The statutory consultation period for an application subject to Environmental Impact Assessment / Environmental Outcomes is 30 days rather than the standard 21 days</i>	✓	✓	✓	✓
Development affecting a Listed Building (including Listed Building Consent)	✓	✓	✓	✓
Development affecting the character or appearance of a Conservation Area	✓	✓	✓	✓
Development affecting a public right of way	✓	✓	✓	✓

Specific issue	Site notice	Neighbour notification letter	Press notice	Online planning register
Departure from the development plan	✓	✓	✓	✓

Amended plans

National policy and Guidance are clear that Councils should work proactively with developers through the decision-making process. As part of this, in some instances, the Council may negotiate with developers through the application process to secure improvements to proposals and applications to address issues or policy conflicts. This may result in amended plans being put forward during the course of the application.

We decide whether amended plans need to be given publicity on the individual circumstances of each case. Any amendments that will significantly affect the appearance or layout of a proposal would generally follow the same procedure as that for the original application, except that only 14 days, rather than 21, is allowed for comments to be made. If a new planning application is required, this will be subject to new public consultation.

5.4. What we do with comments received on planning applications

Checking that comments received are valid and suitable

Comments we receive about a planning or other development application, including names and postal addresses, must be made available for public inspection on the planning file and on the Council’s website.

If you do not include your name and postal address, or you expressly ask for your comments to remain anonymous, your comments will not be taken into consideration in assessing the planning proposal. It is therefore important that in commenting on an application you include your name and postal address within your response.

In accordance with Data Protection legislation, we will ‘redact’ (blank out) any personal information (such as email address, phone number, signature, and any information relating to health conditions or ethnic origin) which is provided to us as part of a comment on planning applications. This information will be kept on the Council’s software system but it will not appear on our website.

Anyone making comments on applications for development respondents are requested to ensure that the content of their representations only contains information that they are satisfied can be made publicly available, as comments will be published on the Council’s

online planning register. We reserve the right not to publish any comments that are not considered suitable for public view, including comments that are offensive, personal or defamatory. We will keep information from planning comments received for a set period set out in our [‘Records and Retention policy’](#).

When making a decision, the Council can only consider comments relating to material planning considerations not covered by other legislation. A summary of the most common material considerations (not exhaustive) is set out below, along with some issues which cannot be considered.

Material planning considerations that can be taken into account when assessing applications

- Adopted local and national planning policies
- Policies in emerging Local Plans
- Previous appeal decisions and case law
- Loss of sunlight or daylight
- Overshadowing
- Loss of outlook
- Overlooking and loss of privacy
- Highways issues such as traffic generation, congestion and safety
- Noise and disturbance resulting from the proposed use (including hours of operation)
- Smells and fumes
- Compatibility of the layout, building design and appearance with the surrounding area
- Loss of, or effect on, trees
- Impact on ecology, nature conservation or biodiversity
- Effects on listed buildings, Conservation Areas or other historic assets
- Risk of flooding
- Deficiencies in infrastructure such as drainage or lack of school spaces
- Contamination or the storage and handling of hazardous materials
- Local financial considerations such as additional income from grants, Council Tax or the Community Infrastructure Levy

Non-material planning considerations that cannot be taken into account when assessing applications

- Matters controlled by Building Regulations such as structural stability and fire precautions
- Matters covered by licences
- Private issues between landowners such as boundary disputes, damage to property, private rights of access and covenants
- Rights to light
- Problems arising from the construction period, such as noise, dust and hours of working, which are covered by Control and Pollution Acts

- Reduction of property value
- Loss of a private view
- Religious or moral issues – such as betting shops or amusement arcades
- Factual misrepresentation of the proposed development
- Opposition to business competition

Determining planning applications

Following the end of the consultation period, we will consider any comments received and make a decision on the application. Although representations on a planning application will not be acknowledged or replied to on an individual basis, all valid responses will be fully considered in the assessment and determination of the application.

Matters raised in the representations will be discussed and addressed through the Planning Officers report on the application. In accordance with legislation, the decision we make on a planning application will be based on the adopted development plan policies unless other material planning considerations dictate otherwise.

Most planning applications are determined by officers under powers delegated to them. A small number of applications are decided by the Council's Planning Committee. Applications presented to Planning Committee will be accompanied by a written report and officer recommendation. Please see section 1.2 for more information about Council Committees.

Planning appeals

If planning permission is refused for a development, approved with conditions which the applicant does not agree with, or not determined within the nationally set timescale, the applicant for permission can appeal to the national government Planning Inspectorate. The Planning Inspectorate is a government agency and is independent of the Council.

Everyone who was notified of the original application or submitted comments will be informed that an appeal has been made. They also have the opportunity to make further written comments, except in the case of Householder Appeals, where the Inspector makes the decision based solely on all the information on the original application file. Any additional comments must be made directly to the Planning Inspectorate and details of how to do this will be included on the notification letter.

Only the applicant can appeal against refused planning permission or imposed conditions. Neighbours and other third parties have no right of appeal. However, if a third party is not happy with the Council's decision and considers that the planning permission was granted unlawfully, and that the correct procedures were not followed, they can challenge the decision through a [judicial review in court](#).

The judicial review process can only consider the lawfulness of the procedure that the council took in coming to the decision to grant planning permission, it is not to consider the planning

merits of the case. A judicial review must be logged within 6 weeks of a date where a challengeable ground arises; generally but not always the decision notice date for a planning decision. Anyone considering a judicial review is advised to seek independent legal advice.

Planning appeals can be dealt with in three ways: written representations, informal hearing or public inquiry. For appeals that are to be decided by informal hearing or public inquiry, interested parties are also given the opportunity to appear before the Inspector to put forward their views.

The Inspectorate will consider the evidence and decide whether the Council's decision was correct. The Inspector's decision is binding and can only be challenged through judicial review in High Court.

Third parties who are aggrieved about a planning decision (either by the Council or Inspector) do not have the right to appeal; their only recourse is to challenge the decision through the High Court.

5.5. Planning Enforcement

In some cases, breaches of planning control can arise. This might include:

- Development occurring without the necessary planning permission in place
- Conditions on a planning permission not being complied with
- Development not being built in accordance with the plans which have been approved
- Works without permission to a Protected Tree or Listed Building

In these situations, the Council has powers of investigation and enforcement. Our role in, and approach to, enforcing planning regulations is set out in our Local Enforcement Plan 2018, available at: [About planning enforcement | Planning enforcement | Reigate and Banstead \(reigate-banstead.gov.uk\)](https://reigate-banstead.gov.uk/about-planning-enforcement/)

The Local Enforcement Plan is designed to help all stakeholders and the local community understand how planning enforcement works, how to make a complaint, and sets out the timescales for investigations and subsequent action. In terms of involvement, it also contains details of how we will keep stakeholders and customers informed during the enforcement process.

5.6. Brownfield Land Register and Permissions in Principle

Brownfield Land Register

The Council has a legal duty (as specified in Town and Country Planning (Brownfield Land Register) Regulations 2017), to publish Brownfield Land Register (BLR) and review it at least once a year. The BLR provides details of previously developed (also sometimes called

‘brownfield’) land, that the local authority considers to be appropriate for residential development. Register will be in two parts:

- Part 1 comprises previously developed sites of 0.25ha or larger (or which are capable of supporting at least 5 dwellings) which the Council deems appropriate for residential development, taking account of suitability, availability and achievability. This will include sites with planning permission as well as sites without.
- Part 2 comprises of those sites in Part 1 which the Council has decided would be suitable for a grant of permission in principle for residential development.

There are no statutory consultation requirements associated with the entry of land onto Part 1 of the Register nor do we propose to undertake any specific consultation at this stage.

The publicity and consultation requirements that we must use for Part 2 of the Register are set out in Regulation 6 of the Town and Country Planning (Brownfield Land Register) Regulations 2017.

Our approach to notification and consultation on brownfield land register entries is set out below in Table 6.

Permission in Principle

The Permission in principle (PIP) consent route is an alternative way of obtaining planning permission for housing-led development.

The PIP consent route has two stages:

1. **The permission in principle (PIP)** stage which establishes whether a site is suitable in principle.
2. **The technical details consent (TDC)** stage is when the detailed development proposals are assessed.

Getting technical details consent has the effect of granting planning permission. There are two ways in which we can grant permission in principle:

- Upon receipt of a valid application for any site that might accommodate a minor (less than 10 homes) housing-led development
- By entering a site in Part 2 of our Brownfield Land Register (BLR) which will trigger a grant of permission in principle for that land, providing the statutory requirements set out in legislation are met. (Note: This is the only route by which brownfield sites capable of accommodating major development (over 10 homes) can achieve PIP).

The Town and Country Planning (Permission in Principle) Regulations 2017 (as amended) sets out the publicity and consultation requirements associated with applications for ‘permission in principle’ or ‘technical details consent’, the latter of which mirrors a standard planning application. These requirements will be met in full as set out below in Table 6.

Table 6: Summary of Brownfield Land Register and Permission in Principle notification requirements

Type of application	Site notice	Notify prescribed bodies	Neighbour notification notice	Online (Council website)
Entry of land onto Part 1 of the Brownfield Land Register				
Entry of land onto Part 2 of the Brownfield Land Register	✓	✓		✓
Application for Permission in Principle	✓	✓		✓
Application for Technical Details Consent	✓	✓		✓

Appendix 1: Find out more about planning in Reigate & Banstead and get involved

Contact us:

By email:

- Planning applications: Planning.applications@reigate-banstead.gov.uk
- Planning policy: LDF@reigate-banstead.gov.uk
- Community Infrastructure Levy (CIL): CIL@reigate-banstead.gov.uk
- Planning enforcement: Planning.enforcement@reigate-banstead.gov.uk

By telephone:

01713 276000 (including Duty Planner)

In person by appointment:

Reigate Town Hall
Castlefield Road
Reigate
Surrey
RH2 0SH

Social media:

<https://www.facebook.com/reigatebanstead>

<https://www.instagram.com/reigatebanstead>

[X](#) (formerly Twitter)

<https://twitter.com/reigatebanstead>

[LinkedIn](#)

[Nextdoor](#)

Find out more on our website:

- General planning information: www.reigate-banstead.gov.uk/planning
- Planning policy: [Planning policy | Reigate and Banstead \(reigate-banstead.gov.uk\)](http://www.reigate-banstead.gov.uk/planning-policy)
- Online planning application search: <https://planning.reigate-banstead.gov.uk/online-applications/>

Sign up:

Planning Policy Consultation Database

The Council keeps a database of people, groups and organisations who have told us that they are interested in being kept up-to-date with, and involved in, the production of any development plan documents, or who the government requires us to involve and consult when we produce new planning policy document or guidance.

Being on the register is the best way to ensure that you are notified of our engagement and consultation activities in preparing planning documents.

Any person or organisation can request to be added to the database to be notified of planning policy related consultations through the following means:

- Using our online form: https://my.reigate-banstead.gov.uk/service/Planning_Policy_Mailing_List
- By emailing: LDF@reigate-banstead.gov.uk
- By post: using the postal address above

Online Planning Register

Sign up to receive notifications of new applications matching your tailor made criteria.

<https://planning.reigate-banstead.gov.uk/online-applications/registrationWizard.do?action=start>

Appendix 2: Further information and advice on planning

Planning Aid England (PAE)

Planning Aid England (PAE) is a service provided by the Royal Town Planning Institute (RTPI) offering independent and impartial professional planning advice and support to help individuals and communities engage with the planning system and get involved in planning their local area. It offers a free mail advice service.

Website: [RTPI | About us](#) or [What is your question about? \(planningaid.co.uk\)](#)

The Planning Portal

The Planning Portal is a 'one-stop-shop' for planning information. It provides information on the planning system, including a helpful guide on when planning permission is required. The Planning Portal also provides a planning application submission service, including the official forms needed.

Website: www.planningportal.co.uk

Locality

Locality is a national membership network which offers support to local community organisations in preparing Neighbourhood Plans and Neighbourhood Development Orders.

Website: locality.org.uk/services-tools/neighbourhood-planning/

Department for Levelling Up, Housing and Communities (DLUHC)

DLUHC is the Government department which currently has responsibility for all issues related to the planning system. DLUHC website provides access to national policy, statistics and latest news related to planning. You can view their website using this link:

<https://www.gov.uk/government/organisations/department-for-levelling-up-housing-and-communities>

The Office for Place is part of DLUHC, formed in July 2021, aiming to improve design standards, including involving communities in (and supporting the role of) Design Codes nationally. Reigate & Banstead Borough Council's 'A23 Corridor Design Code' was selected as a pilot project to receive assistance from Office for Place. You can view more information about their work on their website:

[About our services - Office for Place - GOV.UK \(www.gov.uk\)](#)

The Planning Inspectorate

The Planning Inspectorate processes planning appeals and examines planning policy documents and Community Infrastructure Levy (CIL) documents.

Website: www.gov.uk/government/organisations/planning-inspectorate

Email: enquiries@pins.gsi.gov.uk

Postal address: The Planning Inspectorate, Room 3 O/P, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN

Telephone: 0303 444 5000

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The NPPF must be considered as relevant when preparing Local Plans and determining planning applications. The Planning Practice Guidance (PPG) provides further detailed information on how to implement the national policies.

NPPF: <https://www.gov.uk/guidance/national-planning-policy-framework>

PPG: <https://www.gov.uk/government/collections/planning-practice-guidance>

Equality Impact Assessment

Stage 1: Relevance Screening

1. Introduction

1.1 Service:	Planning
1.2 Name of proposal, policy, strategy or project being assessed:	Local plan Core Strategy Review March 2024
1.3 This is:	Other <i>If other, please specify:</i> A review of current local plan policies to consider whether any need to be updated at this time
1.4 Completing officer's name:	Tanya Mankoo-Flatt
1.5 Date Screening completed:	01/03/2024
1.6 Signed off by:	Head of Service name: Andrew Benson Date: 05/03/2024

2. About the proposal

*** Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project ***

2.1 What is the main purpose of the proposal?

Please explain in one or two short paragraphs

To consider whether the current adopted policies of the Council's local plan Core Strategy remain up to date and effective for decision making.

2.2 Why is it being introduced / reviewed / changed now?

This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.

The local plan Core Strategy policies, adopted by the Council in 2024 to plan for the Borough's strategic development needs between 2012 and 2027, are being reviewed due to a national legal and policy requirement (under the Local Planning Regulations and NPPF Dec 2023) to complete a review of local plans every five years from adoption and to be updated as necessary.
If the Council decides that the local plan policies do not need to be updated, we must publish the Review including reasons for this decision within 5 years of the adoption date of the plan (noting that if some policies need updating but others do not, lists of both types of policies may be published).

2.3 Who could be affected by your proposal?

This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.

a. Will the proposal introduce a change which will affect how services or functions are delivered?

No

If yes, please identify which group(s):
Choose an item.

b. Will the proposal affect people - service users, employees or the wider community?	No	<i>Please briefly explain your answer:</i> Click or tap here to enter text.
--	----	--

3. Assessment of relevance

3.1 Who is the intended audience or target group(s) for the proposal and/or which group(s) of people might be affected?
Internal audience or group: Choose an item.
External audience or group: Multiple (please specify below)
<i>If other or multiple, please specify.</i> Residents, local businesses, developers, landowners
<p><i>Please provide more details about the target audience or affected group(s), for example how many people will be affected and the likely extent of the impact:</i></p> <p>The local plan includes three types of policies for the Borough and which aim to meet the identified needs for development to 2027 in a sustainable manner whilst protecting important aspects of the Borough, including its nationally important landscape (Surrey Hills AONB), the Metropolitan Green Belt within the Borough, built heritage, etc.</p> <p>The policies are spatial strategy policies (CS1 to CS5), place-shaping policies (CS6 to CS9) and cross-cutting policies (CS10 to CS18).</p>

<p>3.2 Evidence and engagement</p> <p><i>What information have you used to assess the proposal for its relevance to equality?</i></p> <p><i>This may be data or evidence or engagement information collected and held by the Council, or by external parties.</i></p> <p><i>General Borough-level and workforce information is available at www.reigate-banstead.gov.uk/equality</i></p>
<p>Consideration of Equality Information: Borough Characteristics 2024; 2021 census date; the 2024 local plan Core Strategy Review, including monitoring data on effectiveness of its policies. The Core Strategy Equalities Impact Assessment March 2009</p>

<p>3.3 Protected characteristics</p> <p><i>Could the proposal affect people with any protected characteristics? Please indicate which by ticking the relevant boxes. Note that 'other vulnerability' is not a protected characteristic but should be considered in addition.</i></p>	
Age <input checked="" type="checkbox"/>	Race or ethnicity <input checked="" type="checkbox"/>
Disability <input checked="" type="checkbox"/>	Religion or belief (or lack of) <input type="checkbox"/>
Gender reassignment <input type="checkbox"/>	Sex <input checked="" type="checkbox"/>
Marriage or civil partnership <input type="checkbox"/>	Sexual orientation <input type="checkbox"/>
Pregnancy and maternity <input type="checkbox"/>	Other vulnerability (inc deprivation) <input checked="" type="checkbox"/>

<p>3.4 Aims of the Equality Duty</p> <p><i>Which of the aims of the Equality Duty are relevant? Please indicate by ticking the relevant boxes.</i></p>
<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act (<i>disadvantages suffered by people due to their protected characteristic</i>) <input type="checkbox"/></p>

Advance equality of opportunity between those who share a protected characteristic and those who do not (*where the needs of people from protected groups are different from the needs of other people*)

Foster good relations between people who share a protected characteristic and those who do not (*encouraging protected groups to participate in public life or in other activities where their participation is disproportionately low*)

4. Conclusions

4.1 Relevance ranking

Please identify in this section the degree to which the proposal has been assessed as relevant to equality

High: The proposal shows a high degree of relevance to one or more protected characteristic and/or one or more aim of the Equality Duty

Moderate: The proposal shows a moderate degree of relevance to one or more protected characteristic and/or one or more aim of the Equality Duty

Low: The proposal shows a low degree of relevance to one or more protected characteristic and/or one or more aim of the Equality Duty

None: The proposal is not relevant to any protected characteristic or any aim of the general equality duty

4.2 Explaining a ranking of Low or None

If your assessment has identified low or no relevance to equality, please explain the reasons for this conclusion below, referencing the information you have used to inform your decision.

Click or tap here to enter text.

4.2 Further analysis

Please identify in this section whether your relevance screening demonstrates the need for further equality analysis

The relevance assessment has identified a **high** or **medium** relevance ranking, and an Equality Impact Assessment is required

The relevance assessment has identified a **low** or **no** relevance ranking, and in consideration of the evidence above, an Equality Impact Assessment is not required

Stage 2: Impact Assessment

You should complete this form if your Stage 1 Relevance Assessment has indicated that an Impact Assessment is needed.

Data and evidence

In undertaking this assessment, you will need to consider relevant data and evidence, depending on the people the proposal will affect, for example:

- Relevant information about service users held by your service
- Relevant information about staff (eg, the workforce equality information published on the [website](#), staff surveys etc)
- Relevant information about borough residents (eg the borough equality information published on the [website](#), service user surveys etc)
- Relevant information published by third party organisations (eg data, research studies etc). This could include (but is not limited to) the [Census](#), [Office for National Statistics](#) or [Joint Strategic Needs Assessment](#)
- Feedback or information from organisations representing target equality groups

1. Introduction

1.1 Service:	Planning
1.2 Name of proposal, policy, strategy or project being assessed:	Local plan Core Strategy Review March 2024
1.3 This is:	Other <i>If other, please specify:</i> A review of current local plan policies to consider whether any need to be updated at this time
1.4 Completing officer's name:	Tanya Mankoo-Flatt
1.5 Date Screening completed:	01/03/2024
1.6 Signed off by:	Head of Service name: Andrew Benson Date: 05/03/2024

**** Note that the term 'proposal' is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project ****

2 Outcomes of Stage 1 Relevance Assessment

2.1 Have you completed a Stage 1 Relevance Assessment for this proposal? If 'No' please complete one before proceeding further with the Stage 2 assessment.
Yes
If yes, what date was the Stage 1 assessment completed? 12/02/2024

2.2 Please indicate which protected characteristics the relevance assessment identified as relevant to the proposal being assessed

Age <input checked="" type="checkbox"/>	Race or ethnicity <input checked="" type="checkbox"/>
Disability <input checked="" type="checkbox"/>	Religion or belief (or lack of) <input type="checkbox"/>
Gender reassignment <input type="checkbox"/>	Sex <input checked="" type="checkbox"/>
Marriage or civil partnership <input type="checkbox"/>	Sexual orientation <input type="checkbox"/>
Pregnancy and maternity <input type="checkbox"/>	Other vulnerability (inc deprivation) <input checked="" type="checkbox"/>

2.3 Please indicate which aims of the Equality Duty the relevance assessment identified as relevant to the proposal being assessed

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act (*disadvantages suffered by people due to their protected characteristic*)

Advance equality of opportunity between those who share a protected characteristic and those who do not (*where the needs of people from protected groups are different from the needs of other people*)

Foster good relations between people who share a protected characteristic and those who do not (*encouraging protected groups to participate in public life or in other activities where their participation is disproportionately low*)

3. About the proposal

3.1 What is the main purpose of the proposal?

Please explain in one or two short paragraphs

The proposal reviews the existing local plan Core Strategy policies (which over the period 2012-2027) to consider whether they remain up to date and effective for continued use for the purposes of assessing planning and related applications for development and planning appeals.

3.2 Why is it being introduced / reviewed / changed now?

This could be, for example, because of new government legislation or guidance, because of changing service user needs, or for financial reasons.

The Council is legally required to review its local plan policies at least once every 5 years starting from the date of their adoption. The local plan Core Strategy was adopted 3 July 2014. Its review in 2019 found its policies remained up to date and effective and did not need updating. Should the Council agree this current local plan Core Strategy review, it will be published on the Council's website.

4. About the customer, audience or target group(s)

4.1 Who is the intended audience or target group(s) for the proposal or which group(s) of people might be affected?

Internal audience or group: Staff and councillors

External audience or group: Multiple (please specify below)

If other or multiple, please specify. Please also use the section below to provide more details about the audience or target group(s):

Local residents, businesses, community groups, those using the Borough for recreation.

4.2 Will the proposal intentionally target any particular protected characteristic group?

Yes

If yes, please identify the group and explain the reason for this and what the intended impact is.

Yes

Whilst some of the local plan Core Strategy policies are aimed at protecting the Borough's natural and historic environment, including for public access leisure opportunities, other policies aim to ensure a variety of housing and economic opportunities are provided for to serve the whole of the Borough's population.

Policy CS5: Valued people and economic development aims to identify and improve the Borough's Regeneration Area to deliver economic, social and environmental improvements to those areas and their residents.

Policy CS6: Allocation of land for development gives priority and focuses development and improvements within the identified regeneration areas of the Borough being the areas with the highest deprivation.

Policy CS7: Town and Local Centres focuses on directing shops and services towards these accessible areas for the benefit of all communities including minimising the need to travel for goods and services and provision of accessible local services.

Policy CS12: Infrastructure Delivery protects community (including health and education) and leisure (sport, cultural and open space) infrastructure to support the Borough's residents and workers. It also requires new developments in the Borough to contribute towards provision of new infrastructure to support the growing resident and working population of the Borough.

Policy CS14: Housing Needs of the community aims to ensure that new developments provide a range of housing to meet the diverse housing needs of the local community. This includes specifically, elderly people, people on low incomes, people with mobility and / or other disabilities.

A range of housing relates to housing types, sizes, and tenure.

Policy CS15: Affordable Housing was superseded by DMP Policy DES6 in September 2019 aims to meet the needs of residents and workers in the Borough who are on lower incomes potentially due to disability, age, or deprivation.

Policy CS16: Gypsies, travellers and travelling showpeople aims to ensure suitable housing is provided within the Borough to meet the needs of ethnic gypsies and travellers who wish to residents in housing that relates to their ethnic needs.

Policy CS16 also protects existing authorised sites from other (potentially higher land value) uses where they are needed in order to ensure continued suitable housing sites remain in the Borough for gypsy and traveller families.

Policy CS17: Travel options and accessibility looks to ensure that a variety of non-car transport infrastructure is available, including bus, rail, and cycling and walking infrastructure.

This policy will help to ensure that residents, workers and visitors to the Borough can access transport suitable to their needs, be it people with mobility, visual

		or other disabilities; elderly people; and people with lower incomes who may not have access to a car.
4.3 Will the proposal intentionally exclude any particular protected characteristic group?	No	<i>If yes, please identify the group and explain the reason for this and any direct or indirect impact on that group.</i> No
4.4 Does the proposal have the potential to reduce inequalities or improve outcomes for protected characteristic groups?	Yes, Improve outcomes	<i>Please briefly explain your answer.</i> Yes For the reasons outlined in section 4.2 above.

4.5 What information do you have about the protected characteristics of the intended audience or group(s) of people who might be affected and what does it tell you? Please refer to any information you hold within your service, evidence from consultation or engagement, information from the Council's Borough and Workforce [Equality Information](#), or external data sources such as the [Census](#), [Office for National Statistics](#) or [Joint Strategic Needs Assessment](#).

If you have no information, state 'none'.

Age	Information source(s): RBBC's Equalities Information: Borough Characteristics 2024
	<p>Summary:</p> <p>The 2021 census recorded 17.71% of the Borough's residents being aged 65 and over, compared to the average for England and Wales of 18.56%, and 21.54% of the Borough's population being aged 16 and under compared to 19.61% nationally.</p> <p>The population's age profile varies considerably across the Borough, with Banstead Village having the highest proportion of population aged 65 or over (25.11%) and the lowest proportion aged 16 or under (15.90%). Conversely, only 11.09% of Redhill East's population was aged 65 or over, and South Park & Woodhatch has almost one quarter of its population (24.79%) aged 16 or under.</p> <p>The type of housing built in the Borough is one of the factors that influences the ages of who can stay living in the Borough and who decides to move to the Borough.</p>
Disability	Information source(s): RBBC's Equalities Information: Borough Characteristics 2024
	Summary: The 2021 census recorded 13.97% of the Borough's population as being disabled under the Equality Act, i.e. their day to day activities are limited either a little or a lot by their health.
Gender reassignment	Information source(s): N/A
	Summary: Click or tap here to enter text.
Marriage and civil partnership	Information source(s): N/A
	Summary: Click or tap here to enter text.
Pregnancy and maternity	Information source(s): N/A
	Summary: Click or tap here to enter text.
Race or ethnicity	<p>Information source(s): RBBC's Equalities Information: Borough Characteristics 2024</p> <p>Traveller Caravan Count (twice yearly data returns to government) in January and July each year to provide local data on winter and summer residences records the number of traveller caravans but not the number of occupants residing in them.</p>

	<p>Summary:</p> <p>The 2021 Census data provides the most recent information about the residents Borough population. This includes Irish and Scottish travellers and Romany gypsies (0.18% of the Borough's population in 2021, i.e. about 272 people from a population at the census time of approximately 150,852).</p> <p>This may well be an under-recording.</p> <p>Core Strategy Policy CS16 sets out the criteria that were used to identify sites to allocate through the DMP, and to determine planning applications relating to unallocated sites.</p> <p>The DMP adopted in 2019 allocates sites sufficient to meet the full need for traveller accommodation identified in the 2017 Reigate & Banstead Gypsy and Traveller Accommodation needs Assessment (GTAA).</p>
Religion or belief (or lack of)	Information source(s): N/A
	Summary: Click or tap here to enter text.
Sex	Information source(s): RBBC's Equalities Information: Borough Characteristics 2024
	<p>Summary:</p> <p>The 2021 census recorded 51% of the Borough's population as being female and 49% as male, with 0.35% identified as a different sex / gender to that registered at birth.</p> <p>This is consistent with a government estimate in 2018 from the government's Equalities Office of between 0.3% and 0.75% of the national population. Cities are likely to have high representation.</p>
Sexual orientation	Information source(s): N/A
	Summary: Click or tap here to enter text.
Other vulnerability (please state)	Information source(s): RBBC's Equalities Information: Borough Characteristics 2024
	<p>Summary:</p> <p>Data on deprivation indicators is collected at Lower Super Output Area (LSOAs) level. This includes indicators such as "income", life expectancy "employment", "health & Disability", "crime", "employment"</p> <p>The government uses published data collected together into an "Index of Multiple Deprivation" (IMD) tool.</p> <p>The IMD ranks LSOAs</p> <p>Of the 317 local authorities in England, R&B was ranked 276 (1 being the most deprived), and so as a whole, the borough scores well in terms of deprivation. Well over half (57.06%) of the borough's households are not deprived in any indicator / dimension.</p> <p>However, this masks areas within the Brough can still face significant challenges with deprivation issues.</p> <p>Within the Borough, deprivation indicators were scored highest in central Horley, Merstham, South Park and Woodhatch, and south Tattenham.</p> <p>Just under one third (30.83%) households were deprived in one indicator / dimension.</p> <p>2.22% of households were deprived in three or four dimensions.</p> <p>Parts of Merstham, which were in the top 20% most deprived areas nationally for older people's income deprivation.</p> <p>Parts of Preston were ranked in the top 30% on this indicator.</p> <p>Parts of Merstham were also in the were in the top 20% for income deprivation</p>

affecting children, as well as parts of Preston and Redhill. Parts of South Park and Woodhatch and Horley in the top 30%.
Parts of Merstham, Preston, Redhill and Horley ranked in the top 30% nationally for health deprivation and disability indicators.

4.6 If you have identified any information gaps that make it difficult to assess the impact of your proposal on people, please explain what the gaps are and explain how those gaps can be filled in the future.

Click or tap here to enter text.

4.7 Has there been any consultation with relevant interested parties or is any consultation planned?

This could include consultation, further evidence gathering or changing or amended the proposed approach. Give consideration to both consultation within the Council (eg staff) and outside the Council (eg residents).

Yes, already undertaken

If yes, please explain the nature of the consultation that has been undertaken or is planned. If no, please explain why consultation is not considered necessary. How were protected characteristic groups consulted or how will they be consulted?

These policies have been subject to public and stakeholder consultation throughout their preparation between 2004 and 2013m, including a public examination of the policies by a government inspector.

4.8 What actions have been, or could be, taken to increase the positive impacts for people with protected characteristic(s) or other vulnerabilities? This could include changing or amending the proposed approach.

None. As noted below, the adopted Core Strategy policies have neither a positive or neutral impact on people with protected characteristics, and the policies were adopted in July 2014 to cover the plan period to 2027. The legal requirement is to review the policies at least every five years, which the Council did in 2019 and is now doing again. As the Review of the local plan Core Strategy found that the policies remain effective and consistent with national policy, there is no need for the adopted policies to be updated at this time.

4.9 What actions have been, or could be, taken to reduce potential negative impacts on people with protected characteristic(s) or other vulnerabilities? This could include changing or amended the proposed approach, or allowing the proposal to be tailored to fit different individual circumstances

As identified the Core Strategy policies adopted in 2014 all have a positive or neutral impact on people with protected characteristics. No negative impacts have been identified, either in this Equalities Impact Assessment or in the 2009 Equalities Impact Assessment for this Core Strategy Review.

5. Assessment of potential impact

Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

In undertaking your assessment, please think about every stage of your process, including the design phase, any consultation, the delivery phase and once the proposal is up and running.

Considering the above information, please summarise the likely impact on protected characteristic groups (within the organisation, outside the organisation or both) This may be direct, indirect or differential impact. Use the above link for definitions, and consider issues such as physical access to services, different cultural or social practices and how people are able to access information.

5.1 Age including children, young people or older people

Does your assessment indicate a disproportionate negative impact relation to Age?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Age?	Yes
If yes, please describe the nature of the positive impact(s)	See section 4.2 above, particularly relating to increasing options for suitable housing and transport for elderly residents and visitors and local shops that provide local shops and service in communities

5.2 Disability including physical, sensory or learning disability or long-term health impairment

Does your assessment indicate a disproportionate negative impact relation to Disability?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Disability?	Yes
If yes, please describe the nature of the positive impact(s)	See section 4.2 above, particularly Policies CS4 relating to ensuring greater opportunity for provision of suitable housing and CS17 relating to transport options

5.3 Gender reassignment

Does your assessment indicate a disproportionate negative impact relation to Gender reassignment?	No
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If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Gender reassignment?	No
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.
5.4 Marriage and civil partnership	
Does your assessment indicate a disproportionate negative impact relation to Marriage and civil partnership?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Marriage and civil partnership?	No
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.
5.5 Pregnancy and maternity	
Does your assessment indicate a disproportionate negative impact relation to Pregnancy and maternity?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact	No

relation to Pregnancy and maternity?	
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.
5.6 Race or ethnicity	
Does your assessment indicate a disproportionate negative impact relation to Race or ethnicity?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Race or ethnicity?	Yes
If yes, please describe the nature of the positive impact(s)	Specialist housing provisions are made for ethnic gypsy and travellers in Core Strategy Policy CS16, as explained in section 4.2 above
5.7 Religion or belief or lack of	
Does your assessment indicate a disproportionate negative impact relation to Religion or belief?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Religion or belief?	No
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.
5.8 Sex	
Does your assessment indicate a disproportionate negative impact relation to Sex?	No

If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Sex?	Yes
If yes, please describe the nature of the positive impact(s)	As set out in Section 4.2 above
5.9 Sexual orientation	
Does your assessment indicate a disproportionate negative impact relation to Sexual orientation?	No
If yes, please describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to Sexual orientation?	No
If yes, please describe the nature of the positive impact(s)	Click or tap here to enter text.
5.10 Other vulnerability	
Does your assessment indicate a disproportionate negative impact relation to any other vulnerability?	No
If yes, please specify the vulnerability and describe the nature of any disproportionate negative impacts.	Click or tap here to enter text.
What actions will be taken to address any disproportionate negative impact?	Click or tap here to enter text.
Does your assessment indicate a positive impact relation to any other vulnerability?	Yes

<p>If yes, please specify the vulnerability and describe the nature of the positive impact(s)</p>	<p>Policy CS6: “Allocation of land for development” gives priority and focuses development and improvements within the identified regeneration areas of the Borough, being the areas with the highest deprivation, with South Park and Woodhatch now also included. The “Regeneration Areas” identified in Policy CSD6 remain the areas subject to higher indicators of deprivation, including in some areas multiple deprivations.</p>
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Important:

Any disproportionate negative impacts must be drawn to the attention of the decision-maker (for example the relevant Board or Committee).

In the event that there are disproportionate negative impacts identified and it is concluded that the proposal should still be agreed/implemented, it is highly recommended that consultation is carried out (including with representatives of the affected group) before the final proposal is agreed

6. Monitoring and review

<p>6.1 How do you propose to monitor the impact of your proposal and keep track of the delivery of any identified actions to address disproportionate negative impact? Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and who will be responsible for this monitoring.</p>
<p>The published Core Strategy Monitoring Framework 2014 and annual Monitors regularly monitor the impact that the Core Strategy policies are having, including performance against the Strategy’s objectives and targets.</p>

<p>6.2 Please outline what the mechanisms for review of the impact of your proposal will be? (for example if any negative impact is found to be occurring) Include detail of review frequency and who will be responsible for the review.</p>
<p>Click or tap here to enter text.</p> <p>This is expected to be the last review of these local plan Core Strategy polices, as the plan period ends in 2027.</p> <p>Preparation of a new local plan started in 2023, and will include consideration of potential Equalities Impacts of policies on people with protected characteristics as they emerge, offering the opportunity to mould the policies to improve their effect on Borough residents, workers and visitors through the iterative process of writing the policies. As set out in the Council’s <i>Statement of Community Involvement (SCI) in Planning</i> 2019, updated 2024, we will make particular efforts to get information on the production of the new local plan to those who are not often heard from, including people whose might not speak or write English, busy working people who may not see the local plan as affecting them.</p> <p>Information on poverty and other indicators of deprivation will be considered in re-assessing the Borough’s communities most at need of targeted spatial planning policies, including any geographic areas in need of regeneration.</p> <p>This will be informed by on-going informal engagement, as well as through two formal consultation with a variety of individuals and organisations living or otherwise having an interest in the future development and protection of the Borough.</p>



Signed off by	Chief Finance Officer
Author	Liane Dell, Democratic Services Officer
Telephone	Tel: 01737 276865
Email	Liane.Dell@reigate-banstead.gov.uk
To	Audit Committee
Date	Tuesday, 13 March 2024
Member	Councillor Frank Kelly, Audit Committee Chair

Key Decision Required	N
Wards Affected	(All Wards);

Subject	Audit Committee Annual Report 2023/24
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Recommendations

- | |
|---|
| <ul style="list-style-type: none"> (i) That the Annual Report of the Audit Committee be noted and, subject to any changes agreed at this meeting, recommended to Council; (ii) That the Audit Committee’s Forward Plan for 2024/25 be approved. |
|---|

Reasons for Recommendations

<p>The purpose of the Audit Committee is to provide independent assurance to the Council of the adequacy of the risk management framework and the internal control environment. The Annual Report provides a summary of the Committee’s work during 2023/24. It also confirms the scope of the Committee’s work programme for 2024/25.</p>
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Executive Summary

<p>The Audit Committee provides an independent and high-level focus on the audit, assurance and reporting arrangements that underpin good governance and strong public financial standards and management.</p> <p>It scrutinises the Council’s governance, risk management and control frameworks and oversees the integrity of financial reporting and annual governance processes.</p>
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It oversees the work of internal audit and external audit, helping to ensure efficient and effective independent assurance arrangements are in place.

During 2023/24 the Committee received quarterly reports on internal audit and risk management. It also considered and provided feedback on the Annual Governance Statement and Code of Corporate Governance.

The roles and responsibilities of the Audit Committee are set out in its terms of reference, which include the requirement to provide an annual report to the Council which presents a summary of work undertaken over the previous year and plans for the coming year.

The above recommendations are subject to approval by the Committee.

Statutory Powers

1. The functions of the Audit Committee are set out in the Council's Constitution, in line with the Local Government Act 2000 as amended by the Localism Act 2011 and the Local Audit and Accountability Act 2014 and the Local Audit and Accounts Regulation 2015

Background

2. The Annual Report 2023/24 sets out the work of the Audit Committee in 2023/24 and considers its forward work programme for 2024/25.

Key Information

Introduction

3. The Accounts & Audit (England) Regulations 2015 require:

[The] authority must ensure that it has a sound system of internal control which – facilitates the effective exercise of its functions and the achievement of its aims and objectives;

(a) ensures that the financial and operational management of the authority is effective; and

(b) includes effective arrangements for the management of risk.

4. The Chartered Institute of Public Finance & Accountancy (CIPFA) sets out further detail on the role of Audit Committees in their Practical Guidance for Local Authorities 2018. It states that “...the purpose of the Audit Committee is to provide to those charged with governance independent assurance on the adequacy of the risk

management framework, the internal control environment and the integrity of the financial reporting and annual governance processes...”

Audit Committee Overview

5. The Committee has continued to operate effectively and has an established forward work programme which is examined periodically by the Chair, Officers and the Committee as a whole. The programme is amended when new requirements and issues are identified which ensures the Committee remains dynamic and focussed on its functions.
6. Five Council members were appointed to the Committee for 2023/24; Councillor Frank Kelly was elected as Chair and Councillor Green was elected as Vice-Chair.
7. Councillor Kelly also attended the LGA’s training event for Audit Committee Chairs at Warwick University this Municipal Year, showing commitment to ensure the Council is adopting good practice and learning from others.
8. Following the resignation of the Independent Member to the Committee in February 2023, Mr Tommy Hyun was appointed as the new Independent Member to the Committee at the Full Council meeting held on 30 November 2023. Mr Hyun attended and was welcomed to the Audit Committee meeting on 6 December 2023.
9. There have been four scheduled meetings during the 2023/24 Municipal year with an additional meeting programmed in on 19 July 2023. The first meeting on 14 June 2023, was dedicated to introducing members to the role of the Committee and its workplan.
10. Committee Members have been invited to attend training and briefings prior to each formal meeting, with the aim of providing additional background and context on the reports that were being presented. These sessions were well attended.

Programme of Work 2023/24

11. The Audit Committee has considered the following during 2023/24:
 - Audit Committee Introduction and Overview
 - Quarterly updates from the Chief Internal Auditor
 - Internal Audit - Annual Report & Opinion 2022/23
 - Internal Audit - Plan and Charter 2024/25
 - Quarterly updates on Strategic Risks and red rated operational risks
 - Draft Annual Governance Statement 2022/23
 - Code of Corporate Governance

Draft Annual Governance Statement 2022/23

12. At its meeting held on 19 July 2023 the Committee was informed that for compliance with the Accounts and Audit Regulations the Council was required to prepare and publish a statement on its internal control and governance arrangements as part of

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the Annual Statement of Accounts. The Statement draws on a number of sources of information about how the Council is performing in order to give a well-rounded picture.

13. The Statement is also an opportunity to flag any areas for concern or improvement. Two matters of note were referenced:
 - The Statement of Accounts for 2020/21 and 2021/22 had not yet been audited or approved by Audit Committee. An extended timescale had been agreed with the external auditor to allow time for completion of agreed actions by the Finance team to address historic shortcomings stretching back over many years in the financial fixed asset register. These issues do not call into question the accuracy of asset values in the accounts, but they give rise to significant challenges for the Finance team when assembling supporting asset records and audit trail. It was therefore agreed with Deloitte that additional capacity and time would be dedicated to remedying these issues as part of 2020/21 end of year work. The audit is now in progress and Deloitte had at that point expected to complete this by September 2023. They would then commence work on auditing the 2021/22 accounts.
 - During the year the authority encountered continued issues relating to a commercial joint venture that has been addressed by the statutory officers under the direction of the Partner, Shareholder and Trustee Executive Sub-Committee and with support from external commercial and legal advisors. This matter is currently subject to legal privilege while the settlement terms are finalised.

Internal Audit Plan 2023/24 and Internal Audit Opinion 2022/23

14. At its meeting on 6 September 2023, the Committee considered the internal audit Opinion for 2022/23. The Southern Internal Audit Partnership (SIAP) reported an overall opinion of “reasonable assurance” on the Council’s framework of risk management, governance and control. SIAP identified that, in giving the overall annual opinion, assurance can never be absolute and therefore, only reasonable assurance could be provided however there were no major weaknesses identified in the processes reviewed.
15. With regards to completion of management actions following audit reviews, SIAP reported that they continued to follow these through to completion. Additionally those audits that received either ‘limited’ or ‘no’ assurance opinions would be subject to future re-review, and would be considered as part of 2024/25 internal audit planning.
16. Throughout the year, the Committee received quarterly updates from SIAP on progress against the 2023/24 Audit Plan and Members requested further detail on overdue low and medium priority management actions and regular updates were provided by officers.
17. The Committee will consider the internal audit Opinion for 2023/24 at the first meeting of the Committee of 2024/25 (currently scheduled for 3 July 2024).

Risk Management

18. The Audit Committee has responsibility for oversight and ensuring robustness of strategic risk-setting and assessing the adequacy of the risk management process. The Committee may raise any observations to the Executive where necessary. The Committee receives quarterly updates on all strategic risks and any red-rated operational risks.
19. Strategic risks are defined as those risks that have an impact on the medium to long term ambitions and priorities of the Council as set out in the Corporate Plan and Medium-Term Financial Plan (MTFP).
20. Operational risks are risks that are encountered in the course of the day-to-day delivery of services. However, if an operational risk cannot be fully managed within the service or it has a wider organisational impact then it will be considered for inclusion in the operational risk register by the Council's Corporate Governance Group. Heads of Service have delegated responsibility for managing operational risks.
21. 2023/24 saw the implementation of the Council's new risk management strategy which had been agreed by Full Council in March 2023. This included an updated reporting structure, including in the controls and mitigations section of the risk register showing what action had been taken already to reduce the likelihood and impact of the risk, as well as the actions that were still ongoing to bring the risks, as far as possible, to an acceptable level.
22. This was complemented by the risk register now setting out the inherent, current and target risk scores. The target risk score defined where the Council aimed to manage the risk to, reflecting the Council's risk appetite.
23. A further improvement introduced by the new risk management strategy is preparation of an annual risk Assurance Framework, presented to Committee at their March 2024 meeting.

Code of Corporate Governance

24. The Code of Corporate Governance sets out the principles of good governance and the arrangements in place to ensure that the Council conducts its business in accordance with the law and proper standards. It provides assurance that the Council is meeting best practice in protecting its assets and serving the community.
25. The Monitoring Officer has reviewed the Code to ensure it still reflected the current governance arrangements of the Council and considered that no updates were required to the current Code as it still reflected the current governance arrangements of the Council.
26. In addition, the Council was currently undertaking a review of its Constitution, which forms a fundamental part of the governance arrangements of the Council, and therefore directly affected the Code of Corporate Governance.

Agenda Item 8

27. This Municipal year the Committee confirmed the current Code of Corporate Governance, and no amendments were recommended. An interim update would take place after the Constitution is reviewed to realign the Code with it. In addition, the Committee resolved that the next review give consideration to its observations recorded in the [minutes of the meeting held on 6 December 2023](#).

External Audit Opinion and Statement of Accounts

28. At the time of preparing this report the authority was still awaiting confirmation of the external auditor's ISA260 report on the Statement of Accounts for 2020/21, 2021/22 and 2022/23. Additional meetings of the Committee will be arranged to consider the auditor's reports and the statement of accounts when the audits are concluded.

Acknowledgement

29. Once again it is acknowledged that 2023/24 has been a productive year and thanks were offered by the Chair to the SIAP, the Finance Team, the Policy & Performance Team and Democratic Services for their contributions in enabling the work of the Committee in 2023/24.

Future Work Programme 2024/25

30. A Forward Plan for the Committee has been compiled and can be found at Annex 1. This may be subject to change as required by the Committee during the year.

Conclusions

31. The Committee provides independent assurance to the Council of the adequacy of the risk management framework, the internal control environment and financial reporting.
32. The Committee's work programme is dynamic to reflect emerging information and will continue to be reviewed to ensure the Committee maximises its contribution to governance and the control framework.
33. The work programme for 2023/24 has been delivered in line with the Committee's remit.
34. In accordance with its Terms of Reference, the Committee is requested to consider and recommend this Annual Report to Council.

Options

35. The Committee has two options:
- Option 1:** To approve the Annual Report of the Audit Committee 2023/24 as written and recommend it to Council.
- Option 2:** To suggest amendments to the Annual Report of the Audit Committee 2023/24 prior to its recommendation to Council.

Legal Implications

36. Audit Committee terms of reference are based upon CIPFA Guidance and meet the requirements of the Accounts & Audit (England) Regulations 2015 which require the Audit Committee to consider the work of internal and external audit to give assurance to give assurance to elected members and the public about the governance, financial reporting and performance of the Council.
37. In approving the above recommendations, the Audit Committee is promoting sound robust risk management in accordance with its statutory responsibilities.

Financial Implications

38. There are no direct financial implications arising from the annual report.

Equalities Implications

39. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
 - Eliminate discrimination harassment and victimisation and any other conduct prohibited under the Act.
 - Advance equality of opportunity between people who share those protected characteristics and people who do not;
 - Foster good relations between people who share those characteristics and people who do not.
40. The three parts of the duty applies to the following protected characteristics: age; disability; gender reassignment; pregnancy/maternity; race; religion/faith; sex and sexual orientation. In addition, marriage and civil partnership status applies to the first part of the duty.
41. The Committee should ensure that it has regard for these duties by considering them through the course of its work. This should include considering:
 - How policy issues impact on different groups within the community,
 - Particularly those that share the nine protected characteristics;
 - Whether the impact on particular groups is fair and proportionate;
 - Whether there is equality of access to service and fair representation of all groups within the Borough;
 - Whether any positive opportunities to advance equality of opportunity and/or good relations between people, are being realised.

Communication Implications

42. There are no communications implications arising from this report.

Environmental Sustainability Implications

43. There are no direct environmental sustainability implications arising from this report.

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Risk Management Considerations
44. Oversight of the Council's risk management arrangements is a key responsibility of this Committee and is considered throughout the wider audit process.
Human Resource Implications
45. There are no Human Resource implications arising from this report.
Consultation
46. The Committee's Annual Report was drafted in consultation with the Chair and Vice-Chair of the Audit Committee.
Policy Framework
47. There are no policy framework implications.
Annex
Annex 1 – Audit Committee Forward Plan 2023/24.

REIGATE AND BANSTEAD BOROUGH COUNCIL:

AUDIT COMMITTEE

Date of issue: 20 March 2024



Report Author(s)	Lead Member(s)	Officer sign off	Subject	O&S	Executive	Council	Open / Exempt	Key
3 July 2024								
<i>Luke Harvey, Project & Performance Team Leader</i>	Portfolio Holder for Corporate Policy and Resources	Head of Corporate Policy, Projects and Performance	Risk Management – Quarter 4 2023/24 To note the Quarter 4 2023/24 update on risk management provided by the report and associated annexes and make any observations to the Executive.		11 July 24		Open	
<i>Tom Borer, Policy Officer</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Internal Audit 2023/24 – Quarter 4 progress report To consider progress in Q4 against delivery of the 2023/24 internal audit plan.				Open	
<i>Tom Borer, Policy Officer</i>	Deputy Leader and Portfolio Holder for Finance and Governance	Chief Finance Officer	Annual Internal Audit report and opinion 2023/24 To consider the audit report opinion for 2023/24.				Open	

Report Author(s)	Lead Member(s)	Officer sign off	Subject	O&S	Executive	Council	Open / Exempt	Key
	and Organisation							
<i>Tom Borer, Policy Officer</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Internal Audit 2024/25 – Q2 internal audit plan To consider the internal audit plan for quarter 2 of 2024/25.					
<i>Pat Main, Chief Finance Officer, Jacqueline Aboagye, Finance Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Draft Annual Governance Statement 2023/24 To review the Draft Annual Governance Statement				Open	
11 September 2024								
<i>Tom Borer, Policy Officer</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Internal Audit 2024/25 – Quarter 1 progress report To consider progress in Q1 against delivery of the 2024/25 internal audit plan.				Open	
<i>Tom Borer, Policy Officer</i>	Deputy Leader and Portfolio Holder for Finance and Governance and	Chief Finance Officer	Internal Audit 2024/25 – Q3 internal audit plan To consider the internal audit plan for quarter 3 of 2024/25.				Open	

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Report Author(s)	Lead Member(s)	Officer sign off	Subject	O&S	Executive	Council	Open / Exempt	Key
	Organisation							
<i>Luke Harvey, Project & Performance Team Leader</i>	Portfolio Holder for Corporate Policy and Resources	Head of Corporate Policy, Projects and Performance	Risk Management – Quarter 1 2024/25 To note the Quarter 1 2024/25 update on risk management provided by the report and associated annexes and make any observations to the Executive.		19 September 24		Open	
4 December 2024								
<i>Tom Borer, Policy Officer</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Internal audit 2024/25 – Quarter 2 progress report To consider progress in Q2 against delivery of the 2024/25 internal audit plan.				Open	
<i>Tom Borer, Policy Officer</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Internal Audit 2024/25 – Q4 internal audit plan To consider the internal audit plan for quarter 4 of 2024/25.				Open	
<i>Luke Harvey, Project & Performance Team Leader</i>	Portfolio Holder for Corporate Policy and Resources	Head of Corporate Policy, Projects and Performance	Risk Management – Quarter 2 2024/25 To note the Quarter 2 2024/25 update on risk		12 December 24		Open	

Report Author(s)	Lead Member(s)	Officer sign off	Subject	O&S	Executive	Council	Open / Exempt	Key
			management provided by the report and associated annexes and make any observations to the Executive.					
<i>Simon Rosser Revenues and Benefits Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Counter Fraud Policy Update To note the Counter Fraud Policy Update.				Open	
<i>Pat Main, Chief Finance Officer,</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Procurement Update To note the update on Procurement activity				Opeb	
<i>Alex Vine Electoral and Democratic Services Manager</i>	Portfolio Holder for Corporate Governance	Commercial and Investment Director	Update of the Code of Corporate Governance To adopt the updated Code of Corporate Governance.				Open	
12 March 2025								
<i>Luke Harvey, Project & Performance Team Leader</i>	Portfolio Holder for Corporate Policy and Resources	Head of Corporate Policy, Projects and Performance	Risk Management – Quarter 3 2024/25 To note the Quarter 3 2024/25 update on risk		20 March 25		Open	

Report Author(s)	Lead Member(s)	Officer sign off	Subject	O&S	Executive	Council	Open / Exempt	Key
			management provided by the report and associated annexes and make any observations to the Executive.					
<i>Luke Harvey, Project & Performance Team Leader</i>	Portfolio Holder for Corporate Policy and Resources	Head of Corporate Policy, Projects and Performance	Risk Management – 2025-26 To receive the 2025/26 strategic risks and assurance framework.		20 March 25			
<i>Tom Borer, Policy Officer</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Internal Audit 2024/25 – Quarter 3 progress report To consider progress in Q3 against delivery of the 2024/25 internal audit plan.				Open	
<i>Tom Borer, Policy Officer</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Internal Audit Plan 2025/26- and Charter 2025/26 To approve the internal audit plan for 2025/26 and Charter 2025/26.				Open	
<i>Liane Dell - Democratic Services Officers</i>	Portfolio Holder for Corporate Policy and Resources	Head of Legal and Governance	Audit Committee Annual Report 2024/25 and Forward Work Programme 2025/26 To consider the Audit Committee's Annual Report and				Open	

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Report Author(s)	Lead Member(s)	Officer sign off	Subject	O&S	Executive	Council	Open / Exempt	Key
			forward work programme for 2025/26.					
Meeting Date TBC for 2020/21 reports								
<i>Pat Main Chief Finance Officer, Jacqueline Aboagye, Finance Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Final Annual Governance Statement 2020/21 To consider the Final Annual Governance Statement 2020/21				Open	
<i>Pat Main, Interim Head of Finance and Assets</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Audited Statement of Accounts 2020/21 To consider the Audited Statement of Accounts 2020/21				Open	
<i>Pat Main, Chief Finance Officer, Jacqueline Aboagye, Finance Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	External Auditor Report (ISA 260) 2020/21 This report, from the Council's external auditors, summarises conclusions and significant issues arising from the audit of the 2020/21 Annual Financial Report.					
Meeting Date TBC for 2021/22 reports								
<i>Pat Main, Chief Finance Officer,</i>	Deputy Leader and Portfolio	Chief Finance Officer	Final Annual Governance Statement 2021/22				Open	

Report Author(s)	Lead Member(s)	Officer sign off	Subject	O&S	Executive	Council	Open / Exempt	Key
<i>Jacqueline Aboagye, Finance Manager</i>	Holder for Finance and Governance and Organisation		To consider the Final Annual Governance Statement 2021/22					
<i>Pat Main, Chief Finance Officer, Jacqueline Aboagye, Finance Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Audited Statement of Accounts 2021/22 To consider the Audited Statement of Accounts 2021/22				Open	
<i>Pat Main, Chief Finance Officer, Jacqueline Aboagye, Finance Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	External Auditor Report (ISA 260) 2021/22 This report, from the Council's external auditors, summarises conclusions and significant issues arising from the audit of the 2021/22 Annual Financial Report.				Open	
Meeting Date TBC for 2022/23 reports								
<i>Pat Main, Chief Finance Officer, Jacqueline Aboagye, Finance Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Final Annual Governance Statement 2022/23 To consider the Final Annual Governance Statement 2022/23				Open	
<i>Pat Main, Chief Finance Officer,</i>	Deputy Leader and Portfolio	Chief Finance Officer	Audited Statement of Accounts 2022/23				Open	

Report Author(s)	Lead Member(s)	Officer sign off	Subject	O&S	Executive	Council	Open / Exempt	Key
<i>Jacqueline Aboagye, Finance Manager</i>	Holder for Finance and Governance and Organisation		To consider the Audited Statement of Accounts 2022/23					
<i>Pat Main, Chief Finance Officer, Jacqueline Aboagye, Finance Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	External Auditor Report (ISA 260) 2022/23 This report, from the Council's external auditors, summarises conclusions and significant issues arising from the audit of the 2022/23 Annual Financial Report.				Open	
Meeting Date TBC for 2023/24 reports								
<i>Pat Main, Chief Finance Officer, Jacqueline Aboagye, Finance Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Final Annual Governance Statement 2023/24 To consider the Final Annual Governance Statement 2023/24				Open	
<i>Pat Main, Chief Finance Officer, Jacqueline Aboagye, Finance Manager</i>	Deputy Leader and Portfolio Holder for Finance and Governance and Organisation	Chief Finance Officer	Audited Statement of Accounts 2023/24 To consider the Audited Statement of Accounts 2023/24				Open	
<i>Pat Main, Chief Finance Officer,</i>	Deputy Leader and Portfolio	Chief Finance Officer	External Auditor Report (ISA 260) 2023/24				Open	

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Report Author(s)	Lead Member(s)	Officer sign off	Subject	O&S	Executive	Council	Open / Exempt	Key
<i>Jacqueline Aboagye, Finance Manager</i>	Holder for Finance and Governance and Organisation		This report, from the Council's external auditors, summarises conclusions and significant issues arising from the audit of the 2023/24 Annual Financial Report.					

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Signed off by	Strategic Head of Legal and Governance
Author	Marie Crabtree, Democratic Services Officer
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To	Overview and Scrutiny Committee
Date	Thursday, 14 March 2024
Executive Member	Councillor Nick Harrison, Chair of Overview & Scrutiny

Key Decision Required	N
Wards Affected	(All Wards)

Subject	Overview and Scrutiny Annual Report 2023/24
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Recommendations
<p>(i) That the Annual Report of the Overview and Scrutiny Committee for this year be noted and recommended to Council.</p> <p>(ii) That any additional observations be made to Council on 28 March 2024.</p>
Reasons for Recommendations
<p>The Overview and Scrutiny Committee serves as a critical friend to the Council and Executive. Holding an authority's decision-makers to account is important to the successful functioning of local democracy, governance, and leadership. Effective scrutiny helps secure the efficient delivery of public services and drives improvements. The Annual Report of the Committee provides a summary of the work of the Committee during 2023/24 to Full Council for approval at its meeting on 28 March 2024.</p>
Executive Summary
<p>The Overview and Scrutiny Committee and its Scrutiny Panels examine whether Council services and policies are being delivered in the most efficient and effective way possible, and whether they are meeting the needs of local residents, businesses, and users of Council services.</p>

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There are strong performance management arrangements in place and the Overview and Scrutiny Committee receives management information quarterly.

The Annual Report of the Committee provides a summary of the work of the Committee in 2023/24 to the Council. This report therefore supports awareness of the role and actions of the Committee by the Council.

The above recommendations are subject to approval by Full Council.

Statutory Powers

1. The requirement for local authorities in England to establish overview and scrutiny committees is set out in sections 9F to 9FI of the Local Government Act 2000, as amended by the Localism Act 2011. The functions of the Committee are set out in the Council's Constitution and in the terms of reference of the Committee.

Background

2. This Annual Report 2023/24 of the Overview and Scrutiny Committee sets out the work of the Committee in 2023/24. Membership and attendance information for the year is set out in Annex 1. The Committee's Annual Work Programme 2024/25 is set out in a separate report to the Committee for consideration by Executive on 21 March 2024 and approval by Full Council on 28 March 2024.

Annual Report

3. This report reflects the work of the Committee as the Council continued to support the borough's residents and keep services operating at a high level in the midst of the increasing cost of living pressures. The Committee scrutinised this programme of work through updates to Committee meetings throughout the year.
4. This year, the Overview and Scrutiny Committee met eight times on 15 June 2023, 6 July 2023, 12 October 2023, 7 December 2023, 25 January 2024, 22 February 2024 and 14 March 2024. A Budget Scrutiny Panel was constituted and completed their work and recommendations in 2023/24. An Environmental Sustainability Strategy Review Panel was constituted and completed their work and recommendations in 2023/24.

Holding the Executive to Account

5. Executive Members, the Managing Director, Directors, and Officers supported the Committee's scrutiny activities and attended meetings of the Committee throughout the year. Executive Portfolio Holders and Officers attended and supported the Budget Scrutiny Panel.
6. The Committee held the Leader and Executive Members to account through:
The attendance of the Leader, the Deputy Leader and Portfolio Holders at the Committee or its Panels to explain how the Executive proposed to deliver its plans and strategies; Portfolio Holders presenting and reporting on their work and

objectives for each of their service areas and responding to questions from the Committee; considering a number of proposed Executive decisions and providing commentary and recommendations to the Executive where judged appropriate.

Leader's Updates

7. Councillor Biggs, Leader of the Council, provided a briefing on the work of the Council at the Committee meetings in September 2023 and January 2024.
8. At the September meeting, the Leader briefed the Committee on Council initiatives and projects, future challenges and engagement between the Executive and the Overview and Scrutiny Committee including leadership updates on continuing to address anti-social behaviour, the positive impact of The Rise on footfall in Redhill, funding from the Department of Levelling Up Communities and Housing to help provide additional temporary housing in the local area, the commencement of work on the outdoor fitness areas in Woodhatch, Lady Neville Recreation Ground and Priory Park, a new transformation plan for Redhill library, consultation on the next round of subway improvements in Horley, and continuing work on environmental sustainability.
9. At the January meeting, the Leader briefed the Committee on Council initiatives and projects, future challenges and engagement between the Executive and the Overview and Scrutiny Committee including leadership updates on the challenges presented by the unexpected closure of the Harlequin theatre, which had brought both a loss of income and a decrease in costs; the successful relocation of the pantomime; approval for a trial of an electric bin lorry and plans to transition waste fleet vehicles to Hydrotreated Vegetable Oil fuel; renewal of the Public Space Protection Order in Redhill; the Housing Policy amendment to support residents interested in downsizing to help make better use of local housing stock; the continuing influence of The Rise, offering new facilities for residents and attracting new businesses to the area; the Volunteer Awards in October 2023; the Business Awards in November 2023; the current light touch review of the Environmental Sustainability Strategy; engagement with stakeholders to inform the development of the next Corporate Plan for 2025-2030; consultation on the A23 Great Street Design Code and the Department of Levelling Up, Housing and Communities funding secured; and plans for the 50th anniversary of Reigate and Banstead Borough Council.

Executive Member Objectives and Updates

10. Executive Members presented the work and objectives of their service areas to the Committee under the three corporate themes of Organisation, People and Place.

Organisation Executive Updates – 12 October

11. Councillor Biggs, Leader of the Council, gave an overview of Communications & Customer Contact and the Corporate Plan Review. This included updates on the changing ways in which residents can contact the Council, the development of a

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communications toolkit providing a library of resources for use by services, and the commencement of engagement with Members on the new Corporate Plan.

12. Councillor Lewanski, Deputy Leader and Portfolio Holder for Finance, Governance and Organisation, gave an overview of Finance, Governance and Organisation service areas. This included updates on Service and Financial Planning, the restructure of Organisational Development & Human Resources service, the successful implementation of voter ID at the May 2023 elections, future plans to review the Constitution and Code of Corporate Governance, replacement of the webcasting equipment in the New Council chamber, a national excellence award for the Council's counter-fraud team.
13. Councillor Andrew King, Portfolio Holder for Commercial and Community Assets, gave an oversight of the Council's commercial agenda, investments and companies, commercial strategy and other work overseen by the Partnership, Shareholder and Trustee Executive Sub-Committee (PSTESC). This included updates on the successful opening of Marketfield Way (The Rise) development, the continuing progress of the Council's exiting arrangements from its companies, PSTESC taking over formal responsibility for the overseeing of charities and ensuring compliance with annual trustee reporting requirements and making effective use of Council owned assets. The Committee receives regular reviews of the Council's property portfolio.
14. Councillor James King, Portfolio Holder for Corporate Policy and Resources, provided a briefing on Council's Performance Management, Corporate Policy, ICT and Data and Insight. This included updates on the approach to the development of Council strategies, work on the Corporate Assurance Framework, the progression of the IT Strategy. This will would be followed by a review of the level of IT resource to help with IT project delivery, and the continuing work of the Data and Insight team.

People Executive Member Updates – 25 January

15. In January, the Committee received a briefing from the People Portfolio Holders on the People service areas.
16. Councillor Neame, Portfolio Holder for Housing & Support, gave an overview of the work on homelessness, housing options, housing register, refugee and asylum seeker accommodation, and housing delivery as well as the work of Family Support, Money Support and Refugee Settlement teams and the work of Housing Benefits and Fraud teams.
17. Councillor Biggs, Leader of the Council gave an overview of work on the three Leisure Centres, Leisure Development, Arts Development, and the Harlequin Theatre. The Council was working hard to continue to provide these services despite the challenges faced by the unexpected closure of the Harlequin Theatre.
18. Councillor Biggs, Leader of the Council, gave an update on the Council's work on Community Partnerships, including community centres, community partnership working with the NHS, and supporting the voluntary sector, as well as supporting food clubs, assisting with fuel poverty, and assisting in the delivery of the Household Support Fund.

Place Executive Member Updates – 14 March

19. **Insert text after March Committee meeting.**

Annual Community Safety Partnership Scrutiny – ‘Crime and Disorder’

20. On 22 February, the Committee held an annual meeting as part of its scrutiny responsibilities under the Crime and Disorder Reduction Act 1998 and the Anti-Social Behaviour, Crime and Policing Act 2014. Councillor Biggs, Leader of the Council, gave an overview of the Council’s work with Surrey Police and Surrey County Council over the last year.
21. The Surrey Police Borough Commander for Reigate and Banstead, Inspector Jon Vale, and Sergeant Rob Staplehurst attended as key community safety partners.
22. The Committee questioned the speakers on a wide range of community safety issues, such as anti-social behaviour, Violence Against Women and Girls, communication between residents and the Police, keyless car theft, County Lines, engaging with minority communities, retail crime and youth engagement.
23. The Community Safety Team also gave a presentation on the work of the Community Safety Partnership. The Committee questioned the team on a wide range of community safety issues, such as identifying and tackling problems, fly tipping, youth provision and ways in which Councillors can help with community safety issues.

Review of the work of the Greenspaces Team

24. On 22 February, the Committee received a presentation on the work of the Greenspaces Team from Councillor Moses, Portfolio Holder for Environment and Sustainability and the Greenspaces Team.
25. The Committee questioned the speakers on a wide range of Greenspaces and Countryside issues, such as management plans, managing Ash Dieback, wildlife surveys, grass cutting methods, and made suggestions on alternative ways of grass cutting and hedge management. Committee members were encouraged to bring their suggestions and comments to the forthcoming consultations on the Greenspaces Strategy.

Performance Monitoring

26. The Committee continued to monitor the Council’s performance. This included reviewing the following information:
 - Service Performance Management (quarterly)
 - Key Performance Indicators (KPIs) (quarterly)
 - Revenue and Capital Budget Monitoring (quarterly)
 - Treasury Management (quarterly)
 - Update on the Corporate Plan 2020-25 (Reigate and Banstead 2025 Annual Report 2022/23).
 - Environmental Sustainability Strategy – Annual Progress Report 2023
27. The quarterly performance reports and KPIs showed that the Council continued to meet the majority of its Key Performance Indicators. Any comments from the Committee on performance were reported to the Executive for their consideration. Treasury Management activities were included in the Revenue and Budget

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monitoring reporting for the first time, and the Council remained in a good financial position.

28. More detailed reporting information on the work of Council services was provided via programme dashboards available on the Members' area of the ModGov intranet.

Advance Questions

29. The Advance Questioning procedure is in use for the Overview and Scrutiny Committee. This allows members of the committee to submit questions in advance of the meeting based on the information received in the agenda pack, which is published five clear working days before the meeting. Advance questions are then forwarded to the relevant officers to provide written responses which are then circulated to committee members the day before the committee meeting and are published in the Council's web library. This procedure allows Council officers and Executive Members to prepare detailed answers to questions arising regarding the agenda item and to provide these detailed answers during the meeting.
30. The Advance Questioning procedure was used to support Member questions on quarterly performance reports as well as advance questions on published reports and presentations in advance of formal Committee meetings (such as Portfolio Holder briefings).
31. The Managing Director, Directors, Chief Finance Officer, Monitoring Officer, and relevant Heads of Service supported meetings of the Overview and Scrutiny Committee to answer additional questions on the Council's performance or via written answers.
32. The Committee also keeps an "Action Tracker", a register of questions raised in meetings which require further research before they can be responded to. Answers are given subsequently in writing and reviewed at subsequent meetings of the Committee, to ensure issues are addressed.

Strategy and Policy Development

33. The Committee commented on the following draft strategies and policies:
 - Medium Term Financial Plan 2024/25 - 2028/29
 - Treasury Management Strategy 2023/24
 - Commercial Strategy
 - Capital Investment Strategy 2024/25 to 2028/29
 - Annual Environmental Sustainability Strategy

Treasury Management

34. This year, Overview and Scrutiny Committee took over responsibility for overseeing the Council's Treasury Management from Audit Committee. Committee members undertook Treasury Management training on 8 June 2023 and were consulted on the Treasury Management Strategy, Investment Strategy, and Capital Strategy for 2023/24 at their meeting on 15 June 2023. Quarterly treasury management updates were provided as part of the Performance Monitoring reports.

35. **Insert text following the March Committee meeting.**

Companies Performance

36. The Committee received two Companies Performance Update reports on the progress of companies owned and part-owned by the Council in July 2023 and December 2023.

The Summer update reported that the Horley Business Park Development LLP was expected to be dissolved, with a Settlement Agreement between members of the LLP underway. Also, that the Council continued to seek critical business information from Pathway for Care Limited in order to review its performance.

The Winter update reported that preparations were being made in anticipation of Greensand Holdings Limited being dissolved, with its assets likely to be transferred to direct holding by the Council.

Also that Horley Business Park Development LLP was on track to be dissolved by way of a Members Voluntary Liquidation.

The report confirmed that Pathway for Care Limited was technically insolvent, and the redemption date of April 2023 for the Council's £1.1 million preference shares had not been honoured.

Commercial Strategy

37. In December 2023, the Committee received a progress update on work aligned with delivery of the Council's Commercial Strategy and objectives. Progress in 2023/24 had included completion of The Rise development at Marketfield Way, a contribution of an additional £700k to the revenue budget from Council property income, and additional income of nearly £540k from planned updates to fees and charges.

Calendar of Meetings 2024/25

38. The Committee received and considered the Calendar of Meetings for 2024/25, before it was presented to Council for approval on 20 February 2024.

Budget Scrutiny Review Panel

39. Councillor Biggs, Leader of the Council, and Councillor Lewanski, Deputy Leader and Portfolio Holder for Finance, Governance and Organisation, with the Managing Director and Chief Finance Officer, attended the Budget Scrutiny Panel on 29 November 2023, to support the Panel's review of Service and Financial Planning for 2024/25. These councillors and officers also attended the Committee meeting when the report of the Budget Scrutiny Panel was considered, to further support this process, and respond to questions from the Committee.
40. The Budget Scrutiny Review Panel reviewed the Service & Financial Planning 2024/25 report. The Panel undertook a robust review of the draft budget proposals and considered 82 advance questions along with further questions and comments that were raised at the meeting.

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41. The Panel recognised and appreciated the significant amount of work that had gone into preparing the draft revenue and capital budget for 2024/25 and concluded that the proposals were achievable and realistic and based on sound financial practices and reasonable assumptions. The Panel noted that proposed savings were not expected to have significant impact on service scope or quality.
42. The Panel noted the national and local policy context and significant uncertainties at that stage of the budget-setting process. It noted that the Service and Financial Planning 2024/25 report forecast a balanced Revenue Budget for 2024/25 subject to final confirmation of outstanding items.
43. The Panel supported changes to the Local Council Tax Support Scheme to be adopted from 2024/25 and the changes to Council Tax premiums on empty properties to be adopted from 2024/25.
44. The Panel expressed concern about general inflationary pressures in the UK economy, which put short-term inflation well above the Bank of England target and suggested this would put further upward pressures on the cost of goods and services and the annual pay award.
45. The Panel noted that the use of earmarked reserves, to fund housing benefit shortfalls, could only be a one-off action and not a permanent solution.
46. The importance of the Council's Financial Sustainability Plan to address future budget gaps was also noted.
47. The Panel noted that, in the Financial Accounts, a £1.1million provision has been made for credit loss with regard to the investment in Pathway for Care. This would be funded from the Commercial Risks and Volatility Reserve.
48. The Budget Scrutiny Panel report and recommendations was reported to the main Committee at its meeting on 7 December 2023. The Committee debated the findings including the Housing Benefit subsidy shortfall and the Government's recently announced increase in the Local Housing Allowance.
49. The Committee resolved to support the recommendations of the Budget Scrutiny Panel report which went to Executive for consideration at its meeting on 14 December 2023, with the additional recommendation to work with other local authorities, and to lobby government, directly and through the through the Local Government Association on the challenges of the shortfall in reimbursement for housing benefit payments.
50. At the Overview and Scrutiny Committee meeting on 25 January 2024, an update for the Committee on the Budget and Capital Programme 2024/25 was given to Members. It was reported to the Committee that the net impact of minor adjustments to Service Budgets resulted in a net growth of £0.134million. Treasury Management budget income forecasts had been reduced by £0.055 million. The forecast budget pressure for the shortfall in housing benefit subsidy had been reviewed and reduced by £0.270 million but remained a significant risk. These changes had made it possible

to reduce the call on reserves. Increased Minimum Funding Guarantee Grant from Government had offset a decrease in New Homes Bonus Grant and Services Grant. The budget for 2024/25 was therefore balanced.

51. Members asked questions about the balance on the IT Strategy Reserve and how it would be used.
52. The Committee noted the updated elements of the Budget and had no further observations to make to Executive on 1 February 2024.

Environmental Sustainability Strategy Review Panel

53. Councillor Moses, Portfolio Holder for Environment and Sustainability, with the Head of Corporate Policy, Projects and Performance and Sustainability Project Officer, attended the Environmental Sustainability Strategy Review Panel on 12 February 2024, to support the Panel's review of the Environmental Sustainability Strategy and Action Plan. Councillor Moses and the officers also attended the Committee meeting when the Environmental Sustainability Strategy Review was considered, to further support this process, and respond to questions from the Committee.
54. The Environmental Sustainability Strategy Review Panel reviewed the Council's Environmental Sustainability Strategy and Action Plan Report and supporting documents. The Panel undertook a robust review of the strategy proposals and considered 21 advance questions along with further questions and comments that were raised at the meeting.
55. The Environment Sustainability Strategy Review Panel minutes and the updated Environmental Sustainability Strategy and Action Plan were reported to the main Committee at its meeting on 14 March 2024.
56. **Insert text following March Committee meeting.**

Local Plan Update

57. In October 2023, the Committee received an update on the development of the new Local Plan, setting out the current position and the proposed way forward. The current Local Plan would end in 2027 and the Council would be working towards the new style of local plan.
58. **Insert text following March Committee meeting.**

Lessons Learnt – Pitwood Park, Cromwell Road and Lee Street

59. At the Overview and Scrutiny Committee meeting held on 12 October 2023, the Committee received a report setting out a project overview for the three recent housing delivery projects at Pitwood Park, Cromwell Road and Lee Street, including the Council's key reflections and learnings from these recent housing delivery projects undertaken between October 2020 and August 2022.

Marketfield Way Update

60. A report containing an update on the progress of the Marketfield Way project was presented to Overview and Scrutiny Committee on 7 December 2023.
61. The report highlighted the challenges of the project, which had been overcome, but had led to delays and cost increases. The Rise was now open, welcoming thousands

Agenda Item 9

of people every day; the residential part of the development had been sold to the Council's private sector partner and over 70% of the commercial floorspace had been let, with letting agreements for the remaining units underway.

62. Continued discussion of the Marketfield Way project took part in a Part 2 session of the meeting reviewing timescales, budgets, and costs. The project was subsequently funded by an additional capital bid of £4.2million, approved at the full Council meeting in February 2024.

Call-in of Executive Decisions

63. Call-in is a provision of the Local Government Act (2000) that enables councillors on Overview and Scrutiny committee to ensure that the principles of decision making set out in the council's Constitution are adhered to. It allows Overview and Scrutiny committees to require the council's Executive to reconsider a decision which has been made, but not yet implemented.

Call-in is only intended to be used in exceptional circumstances.

64. There were no Call-Ins of Executive Decisions during 2023/24.

This indicates that there is a good working relationship between Overview and Scrutiny and Executive, in which Overview and Scrutiny are consulted on forthcoming Executive business avoiding use of the call-in procedure.

Operational arrangements

65. The Chair of the Committee had regular meetings with the Managing Director (Mari Roberts-Wood), Director (Luci Mould), Chief Finance Officer (Pat Main), and relevant Heads of Service. This focused the planning and delivering of the Committee's work programme. In accordance with the Overview and Scrutiny Committee's Procedure Rules, the Committee's work programme for 2024/25 was discussed with the Leader.

Conclusion

66. The Committee recognises that the Council continues to focus on outcomes for residents and businesses and is responding well to continuing financial pressures and managing its processes in an efficient manner. The work of the Overview and Scrutiny Committee has maintained a streamlined approach in 2023/24 and in developing its annual work programme for the coming year 2024/25 has sought to continue this.
67. The Committee has worked hard on behalf of the Council and community in scrutinising the Council's decision-making process, holding Executive Members to account, and monitoring the Council's performance, as well as contributing to strategic policy development such as the Capital Investment Strategy 2024/25 to 2028/29.

Options

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68. The Committee has the option to support the Annual Report of the Overview and Scrutiny Committee 2023/24 and make any additional observations.
69. The Committee has the option not to support the Annual Report of the Overview and Scrutiny Committee 2023/24. This is not the recommended course of action.

Legal Implications

70. There are no immediate legal implications arising from this report. The Overview and Scrutiny Committee is a strategic function of the authority and central to the organisation's corporate governance.

Financial Implications

71. There are no direct financial implications arising from the annual report.

Equalities Implications

72. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
 - Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act;
 - Advance equality of opportunity between people who share those protected characteristics and people who do not;
 - Foster good relations between people who share those characteristics and people who do not.
73. The three parts of the duty applies to the following protected characteristics: age; disability; gender reassignment; pregnancy/maternity; race; religion/faith; sex and sexual orientation. In addition, marriage and civil partnership status applies to the first part of the duty.
74. The Committee should ensure that it has regard for these duties by considering them through the course of its work. This should include considering:
 - How policy issues impact on different groups within the community, particularly those that share the nine protected characteristics;
 - Whether the impact on particular groups is fair and proportionate;
 - Whether there is equality of access to service and fair representation of all groups within the Borough;
 - Whether any positive opportunities to advance equality of opportunity and/or good relations between people, are being realised.

Communication Implications

75. There are no significant communications implications arising from this report.

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Environmental Sustainability Implications

76. There are no significant environmental sustainability implications arising from this report.

Risk Management Considerations

77. There are no significant risk management implications arising from this report.

Consultation

78. In accordance with the Overview and Scrutiny arrangements contained in the Council's constitution, the Committee's Annual Report was discussed with the Chair and Vice-Chair of the Overview and Scrutiny Committee.

Policy Framework

79. There are no policy framework implications.

Background Powers

1. Corporate Plan 2025 - https://www.reigate-banstead.gov.uk/info/20205/plans_and_policies/280/reigate_and_banstead_2025
2. Annex 1 – Overview and Scrutiny Committee 2023/24 – Membership and Member Attendance

Overview and Scrutiny Committee 2023/24

Membership and Attendance

8 O&S meetings up to 14 March 2024.

Note – this record of attendance needs to be updated following the final meeting of the year on 14 March 2024.

Councillor N. Harrison	Chair	8 meetings
Councillor G. Buttironi	Vice-Chair	6 meetings
Councillor J. Baker	Member	7 meetings
Councillor M. Blacker	Member	7 meetings
Councillor J. Booton	Member	6 meetings
Councillor J. Dwight	Member	7 meetings
Councillor M. Elbourne	Member	5 meetings
Councillor K. Fairhurst	Member	8 meetings
Councillor B. Green	Member	7 meetings
Councillor G. Hinton	Member	7 meetings
Councillor S. Khan	Member	8 meetings
Councillor S. Parnall	Member	7 meetings
Councillor A. Proudfoot	Member	8 meetings
Councillor R. Ritter	Member	6 meetings
Councillor K. Sachdeva	Member	5 meetings

Virtual Attendance

Councillor J. Booton	Member	1 meeting
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Substitutes at meetings

Councillor Z. Cooper	Substitute Member	1 meeting
Councillor J. Essex	Substitute Member	3 meetings
Councillor P. Harp	Substitute Member	1 meeting
Councillor J. Hudson	Substitute Member	2 meetings
Councillor S. Kulka	Substitute Member	3 meetings

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Signed off by	Strategic Head of Legal and Governance
Author	Marie Crabtree, Democratic Services Officer
Telephone	01737 276657
Email	marie.crabtree@reigate-banstead.gov.uk
To	Overview and Scrutiny Committee – 14 March 2024 Executive – 21 March 2024 Council – 28 March 2024
Date	Thursday, 14 March 2024
Executive Member	Chair of Overview and Scrutiny Committee

Key Decision Required	N
Wards Affected	(All Wards)

Subject	Overview and Scrutiny Proposed Annual Work Programme 2024/25
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Recommendations
That the proposed Work Programme for 2024/25 as set out at Annex 1 and detailed in the report be approved.
Reasons for Recommendations
To agree a Work Programme for the Overview and Scrutiny Committee for the 2024/25 Municipal Year.
Executive Summary
<p>The Overview and Scrutiny Committee proposed annual Work Programme 2024/25 sets out a programme of activity that is in line with the Council’s priorities. The Work Programme for the coming year is considered and agreed by the Overview and Scrutiny Committee for consultation with the Executive.</p> <p>Following consultation with the Executive and the Leader, the Work Programme is submitted for approval by the Council so that it can be agreed before the start of the next Municipal Year.</p>

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The above recommendations are subject to approval by Full Council.

Statutory Powers

1. The Local Government Act 2000 (as amended) established Overview and Scrutiny Committees within the Leader with Cabinet model of governance. Subsequent legislation including the Police and Justice Act 2006, the Local Government Public Involvement in Health Act 2007, the Local Democracy, Economic Development and Construction Act 2009, the Localism Act 2011 and the Local Authorities (Overview and Scrutiny Committees) (England) Regulations 2012 has provided additional responsibilities on the Committee.

Background

2. As required by the Constitution, an outline of the Committee's work programme for the year is discussed between the Leader of the Council and the Chair of the Committee with representatives from the Management Team.
3. The Committee's work programme is designed to help it plan its business during the year and is set out in various categories in paragraphs 8 to 29.
4. To provide flexibility (to accommodate matters not contained within the work programme) the following protocol has been established: *"In addition to the Committee's agreed work programme it needs to allow flexibility for additional priority work that emerges during the course of the year. In those circumstances the Committee should be permitted to undertake that piece of work following consultation and agreement with the Chairman of the Committee and appropriate Executive Member and Management Team Manager. In the event that this is not possible a report should be made to the Executive requesting the inclusion of the issue within the work programme"*.
5. The prioritisation of the Work Programme may be adjusted by the Chair during the year to manage the business effectively.
6. An important element of the Committee's work is to ensure that it continues to assist the Council in driving forward the Corporate Plan's key objectives and priorities. The Committee's work programme is therefore designed in a constructive way to link with the Executive's work programme.

Key Information

7. Annex 1 sets out a summary of the Committee's proposed Work Programme 2024/25 and further details are set out below.
8. Policy Framework consultations – It is proposed that the Work Programme includes Policy Framework consultation documents as required by Policy Framework procedures within the Council's Constitution. There are no new Policy Framework consultations documents currently in progress, however any that emerge during the course of the year will be reported to the Committee.
9. Strategies and Plans - A plan is prepared administratively which continues to identify all of the strategies/plans that will be reviewed by the Executive. Work is also underway to implement other important strategies such as the Commercial Strategy and the Leisure and Culture Strategy. Progress will be reported in line with the arrangements set out in those

strategies. Specifically, an annual update on the Commercial Strategy was presented to the committee in December 2023 and it is planned to repeat this in 2024/25. Where an updated strategy is being prepared, and where the proposed strategy is not significantly different, or where changes have been tested through Member briefings/seminars, then following consultation with the Chair, a formal report will not usually be brought to the Committee.

10. Work Programme rolled forward from 2023/24 – The Review of the Greenspaces Strategy will be rolled forward to 2024/25. The Leisure and Culture Strategy, which has been delayed by the unexpected closure of The Harlequin theatre, will also be rolled forward to 2024/25.
11. Portfolio Holder Objectives – The Committee has continued to work closely with Executive Members during 2023/24 and has received presentations from Portfolio Holders on a number of the Council's priority work streams. The Committee proposes to continue this approach in 2024/25.
12. Leader Updates – To support effective cooperation of the Committee and the Executive, the Committee receives twice-yearly updates from the Leader of the Council on the Council's overarching activities and strategic objectives. The Committee proposes to continue this approach in 2024/25.
13. Performance Management Monitoring Activities – The Committee has a role to monitor the performance of the Council. Programme and project dashboards are made available each month on the ModernGov intranet library. The monitoring activities have been fulfilled by reporting on the following matters, which the Committee consider appropriate to continue for 2024/25.
14. Quarterly Revenue and Capital budget monitoring forecasts.
15. Quarterly Treasury Management forecasts.
16. Quarterly Service Performance Management Monitoring.
17. Corporate Plan performance (annual basis).
18. Local Plan Update – Group Leaders agreed the previous year, that the Portfolio Holder for Place, Planning, and Regulatory Services should give six-monthly updates to Overview & Scrutiny Committee to monitor progress and address any issues arising from the new Local Plan. The Committee received updates in October 2023 and March 2024 and proposes to continue this approach in 2024/25.
19. Panels for 2024/25 – In addition to the annual Budget Scrutiny Panel and the Local Plan Scrutiny Panel, three members of the Committee have been appointed to the Local Plan Advisory Group. An Environmental Sustainability Strategy Review Panel was established in 2023/24 and concluded its business; there is no intention for this panel to meet in 2024/25. However, there will be an annual update on the Strategy to the full committee.
20. Budget Scrutiny Panel – The Committee has established an annual Budget Scrutiny Panel. The Budget Scrutiny Review Panel held one meeting in 2023/24 (29 November 2023) and reviewed the Service and Financial Planning 2024/25 report and supporting documents. A streamlined approach, supported by an advance questioning process, continued to work well and allowed the Panel to conclude its work in one meeting.
21. It is therefore suggested that the Panel's work in 2024/25 be based on considering the Provisional Budget proposals for 2025/26 (including any updated assumptions within the Medium Term Financial Plan, appropriate revenue projections and a progress report on the Capital Programme projections).
22. Local Plan Scrutiny Review Panel – The Local Plan Scrutiny Review Panel did not meet in 2023/24. A Local Plan Scrutiny Review Panel is planned for 2024/25 to review the responses to the public consultation on the new Local Plan.

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23. Externally Focused Overview and Scrutiny work – The Committee has successfully undertaken scrutiny with and of partner organisations in recent years. At the meeting of the Environmental Sustainability Strategy Review Panel, it was suggested that the Committee could review the two water utilities operating in the borough (SES Water and Thames Water). It is recommended that wastewater arrangements is the priority for 2024/25, and that the form of scrutiny be explored by officers and the Chair.
24. Crime and Disorder Scrutiny – The Committee is the ‘crime and disorder’ scrutiny committee for the purposes of the Police and Justice Act 2006. This requires the Committee to undertake scrutiny activity of crime and disorder matters once every 12-month period. The Committee has worked well with partners such as the Reigate and Banstead Borough Commander, Surrey Police and Surrey County Council in developing this work.
25. In 2023/24 the Committee invited the Portfolio Holder for Community Partnerships, along with representatives of the Police and Community Safety Partnership to this meeting (on 22 February 2024) to assist. It is proposed that the Committee continue to undertake this activity in 2024/25.
26. Members discussed a review of recycling, to include food waste and services to flats and social housing. It was agreed this review would be held as ‘pending’ following the new Resources and Waste Strategy from Government, which was likely to require revisions to the Council’s own Waste Strategy.
27. Council Corporate Scrutiny – the Managing Director, Directors, Leader, and Chair of the Overview & Scrutiny Committee considered the balance between effective scrutiny, with the need to protect commercial confidentiality and enable the Council’s services to operate competitively.
28. In 2023/24, updates on Council-owned companies were considered by the Committee bi-annually. This is planned to continue.
29. Call-Ins – The Committee would also consider matters that have been called in for review. There were no Call-Ins of Executive decision in 2023/24.

Options

30. The Executive has the option to support the proposed Overview and Scrutiny Work Programme 2024/25 as set out in the report.
31. The Executive has the option not to support the proposed work programme as set out in the report and request it to be reconsidered. This is not recommended as the Committee would not then have a scrutiny work programme in place for 2024/25 to enable them to carry out effectively their scrutiny of the Executive.

Management Team Comments

32. Management Team are supportive of the Work Programme proposed.
33. The work of the Committee is clearly a valuable part of the overall checks and balances needed to ensure that the authority makes decisions that are robust and challenged with the best interests of the community and the delivery of quality services at the heart of this remit.

Legal Implications

34. There are no immediate legal implications arising from this report. However, if the proposed Work Programme is not adopted then this will mean that the work of the

Council will not have the overview and scrutiny that is a strategic function of the authority and central to the organisation's corporate governance. The Work Programme provides councillors, who are not in decision-making roles, a work plan to set out what and how it wants to hold the Executive publicly to account over the coming year.

Financial Implications

35. There are no direct financial implications arising from the recommendations set out in this report. Should any of the work undertaken by Overview and Scrutiny generate recommendations with financial implications then these will be highlighted at that time.

Equalities Implications

36. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act;
 - Advance equality of opportunity between people who share those protected characteristics and people who do not;
 - Foster good relations between people who share those characteristics and people who do not.
37. The three parts of the duty applies to the following protected characteristics: age; disability; gender reassignment; pregnancy/maternity; race; religion/faith; sex and sexual orientation. In addition, marriage and civil partnership status applies to the first part of the duty.
38. The Committee should ensure that it has regard for these duties by considering them through the course of its work. This should include considering:
- How policy issues impact on different groups within the community, particularly those that share the nine protected characteristics;
 - Whether the impact on particular groups is fair and proportionate;
 - Whether there is equality of access to service and fair representation of all groups within the Borough;
 - Whether any positive opportunities to advance equality of opportunity and/or good relations between people, are being realised.

Communication Implications

39. There are no significant communications implications arising from this report.

Environmental Sustainability Implications

40. There are no significant environmental sustainability implications arising from this report.

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Risk Management Considerations
41. There are no significant risk management implications arising from this report.
Resource Implications
42. The main role of the Council in considering the Overview and Scrutiny Committee's Work Programme is to ensure that the work streams are appropriate and not duplicating ongoing work. More importantly the Council must ensure appropriate resources are available to add value to that Work Programme and balance the demands of the Committee against the overall priorities of the Council. Given the proposed work programme, no specific resource implications beyond those planned are anticipated.
Consultation
43. In accordance with the Overview and Scrutiny arrangements contained in the Council's Constitution, the Committee's future work programme was discussed with the Leader and the Chair/Vice-Chair of Overview and Scrutiny.
Policy Framework
44. Policy framework considerations are noted in paragraph 8 and 9.
Background Powers
1. Annex 1 sets out a summary outline of the proposed O&S Annual Forward Work Programme 2024/25.

Overview and Scrutiny Committee

Annex 1 - Proposed Annual Forward Work Programme 2024/25

What is scrutinised by O&S each year

Topic	How often
Service and Financial Planning Budget Scrutiny Panel	Budget Scrutiny Panel plus scrutiny of Service and Financial Planning reports for the following financial year (November/December)
Performance Management Monitoring: <ul style="list-style-type: none"> • Quarterly Revenue and Capital Budget monitoring forecasts • Quarterly Treasury Management Performance • Quarterly Service Performance Management Monitoring (KPIs) • Reigate and Banstead 2020-25 (Corporate Plan) – Performance Report 2023/24 	Quarterly 12 Sept - Q1 2024/25 5 Dec - Q2 2024/25 13 March – Q3 2024/25 12 June – Q4 2024/25 1 meeting – June or July
Leader's Update	Twice yearly
Portfolio Holder updates: <ul style="list-style-type: none"> • Organisation – Corporate Policy & Resources, Finance, Governance & Organisation, Commercial & Community Assets • People: Housing & Support, Communities, Leisure & Culture • Place: Place, Planning & Regulatory Services, Neighbourhood Services, Corporate Policy & Resources 	Three times a year at three separate meetings 10 Oct 2024 / 23 Jan 2024 / 13 March 2025
Companies Performance Updates	Twice yearly (partially Exempt)
Environmental Sustainability Strategy update	Annually (Autumn)

Commercial Strategy Update	Annually (Autumn)
Local Plan Update	Twice yearly (October and March)
Policy Framework consultations	No new policy consultations in progress
Annual Community Partnership Scrutiny 'Crime and Disorder Scrutiny'	Once a year - February
O&S Annual Forward Work Programme	March
O&S Annual report	March

Scrutiny Panels planned 2024/25

Budget Scrutiny Review Panel	27 November 2024
Local Plan Scrutiny Panel	To be agreed

Task and Finish Groups

KPI Task and Finish Group	To be agreed
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Items brought forward from 2023/24 – scope to be agreed

To review the recycling service, following proposed revisions to the service as a consequence of the Government's Resources and Waste Strategy. Agreed to hold this topic as a pending item for scrutiny early in 2024/25.

To review the Greenspaces Strategy. Agreed to hold this as a pending item for scrutiny in 2024/25.

To review the Leisure and Culture Strategy

Member Suggestions – additional scrutiny topics - Overview and Scrutiny Committee 2024/25

To review the wastewater arrangements (Thames Water) as suggested by the Environmental Sustainability Strategy Review Panel

O&S Meeting dates 2024/25

Seven O&S Committee meetings a year (plus one - Annual Community Safety Partnership Scrutiny) and Budget Scrutiny Panel, and Local Plan Scrutiny Panel (if required).

13 June 2024 (Election of Chair/Vice-Chair), 4 July 2024, 12 Sept 2024, 10 Oct 2024, 27 Nov 2024 (Budget Scrutiny), 5 Dec 2024, 23 Jan 2025, 27 Feb 2025 (Annual Community Safety Partnership), 13 March 2025

(As at 15 March 2024)

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Signed off by	Strategic Head of Legal & Governance/Monitoring Officer
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Email	annette.wiles@reigate-banstead.gov.uk, alex.vine@reigate-banstead.gov.uk
To	Council
Date	Thursday, 28 March 2024
Executive Member	Deputy Leader and Portfolio Holder for Finance, Governance and Organisation

Key Decision Required	No
Wards Affected	-

Subject	Changes to Committee Appointments
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Recommendations
That Council approve membership of Committees as set out in the schedule of nominations by Group Leaders within Annex 1 (to follow within an addendum to the agenda).
Reasons for Recommendations
As detailed in Article 4.2.5 of the Constitution, the approval and/or amendment of Committee responsibilities is a function of Full Council. Following an increase in the number of Independent Members and a vacancy, the political balance of the Council has been reviewed in consultation with Group Leaders and the allocation of Committee Seats under political proportionality rules has changed. Appointment of Members to committee seats, as nominated by the Group Leaders, is for the Council to determine.
Executive Summary

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In accordance with Article 4.2.5 of the Constitution, Full Council approved Committee responsibilities at its Annual meeting on 25 May 2023 following the local elections held on 4 May 2023.

Two changes have occurred since Council's approval:

- There has been an increase in the number of ungrouped members by one since 5 March 2024; and
- Following a resignation, the Tattenham Corner and Preston seat has been vacant since 14 March 2024. A by-election will take place on 2 May 2024.

As a result, the following seats are now held on the Council by Group:

- Conservative: 22
- Green: 11
- Residents' Association: 5
- Liberal Democrat: 3
- Ungrouped: 3
- Vacancy: 1

A minimum of two Members are required to form a Political Group. An ungrouped Member has no entitlement to sit on Committees. The increase by one to three ungrouped Members and a vacancy, means a change in the political balance and therefore Committee appointments. In accordance with Article 4.2.5 of the Constitution these changes are required to be approved by Full Council.

The above recommendations are subject to approval by Full Council.

Statutory Powers

1. Article 4.2.5 of the Constitution, states the approval and/or amendment of Committee responsibilities is a function of full Council.
2. The political proportionality rules are set out in the Local Government and Housing Act 1989 and the Local Government Act (Committees and Political Groups) Regulations 1990.

Background

3. Not applicable.

Key Information

Committee Appointments

4. There is an overall allocation of 57 ordinary Committee seats. In accordance with the changes that have occurred since Council last approved appointments to Committees at the Annual Council meeting on 25 May 2023, these will be allocated as follows:
 1. Conservative: 30
 2. Green: 15

3. Residents' Association: 7
4. Liberal Democrat: 5
5. This reflects a reallocation of one seat from the Residents' Association Group to the Liberal Democrat Group.
6. The details of the reallocation are shown in Annex 1 to this report (Schedule of Nominations for Committee Appointments).
7. Annex 1 is recommended for approval by Council.

Options

8. There are no alternative options for consideration.
9. Section 17 of the Local Government Act (Committees and Political Groups) Regulations 1990 requires a review of the allocation of seats to political groups as soon as is practically possible.

Legal Implications

10. The Local Government and Housing Act 1989 established the principle of the proportional allocation of committee and sub-committee seats. The Council is also required under the Act to keep under review the representation of the different political groups on bodies appointed by the Council.
11. Where there are non-aligned councillors, regulation 16 of the Local Government (Committees and Political Groups) regulations 1990 modifies the above and requires proportional allocation of seats to those members and introduces the requirement to have regard to the wishes of political groups in the allocation of members to their allocated seats.
12. The Act sets out four principles which must be followed so far as reasonably practicable. They are:
 - i. Preventing domination by a single group: All the seats on a committee should not be allocated to the same political group.
 - ii. Ensuring a majority group enjoys a majority on all committees: If one political group has a majority in the full Council, that political group should have a majority on each committee.
 - iii. Aggregating all committee places and allocating fair shares: Subject to the above two principles, the total number of seats on all the committees of the Authority allocated to each political group should be in the same proportion as that political group's seats on the full Council.
 - iv. Ensuring as far as practicable fairness on each committee: Subject to the above three principles, the number of seats on each committee of the Authority allocated to each political group should be in the same proportion as that political group's seats on the Full Council.

13.

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Financial Implications
14. The only financial implications as a result of this report are changes to the payment of Special Responsibility Allowances. These are already accounted for as part of the Member Allowances Scheme for 2023/24 and there is no increase in funding required.
Equalities Implications
15. There are no equalities implications arising from this report.
Communication Implications
16. There are no communication implications arising from this report.
Environmental Sustainability Implications
17. There are no environmental sustainability implications arising from this report.
Risk Management Considerations
18. There are no risks to be considered as arising from this report.
Other Implications
19. There are no other implications arising from this report.
Consultation
20. Group Leaders have been consulted. The reallocation of one seat from the Residents' Association to the Liberal Democrat Group and the vacancies on the Planning and Licensing & Regulatory Committees have been addressed through consultation with Group Leaders.
Policy Framework
21. As detailed in Article 4.2.5 of the Constitution, the approval and/or amendment of Committee responsibilities is a function of full Council.
Background Powers
22. Not applicable.

Appointment to Committees

Inclusive of the changes arising from the increase in Independent Members and a vacancy.

Audit Committee (Politically Balanced) 5 Members

	Appointment	Substitutes
1. Conservative	Cllr Buttironi	Cllr Fairhurst and Cllr Sachdeva
2. Conservative	Cllr Green	
3. Conservative	Cllr Kelly	
4. Green	Cllr Chester	Cllr Essex and Cllr Torra
5. Liberal Democrat	Cllr Kulka	

Employment Committee (Politically Balanced – must include at least one Executive Member) 5 Members

	Appointment	Substitutes
1. Conservative	Cllr Biggs	Cllr Baker and Cllr Parnall
2. Conservative	Cllr Lewanski	
3. Conservative	Cllr Tary	
4. Green	Cllr Chandler	Cllr Essex
5. Residents' Association	Cllr Adamson	Cllr Harper and Cllr Harrison

Licensing and Regulatory Committee (Politically Balanced) 12 Members

	Appointment	Substitutes
1. Conservative	Cllr Baker	Cllr Buttironi
2. Conservative	Cllr Blacker	
3. Conservative	Cllr Dwight	
4. Conservative	Cllr Fairhurst	
5. Conservative	Cllr Hudson	
6. Conservative	Cllr Stevens	
7. Green	Cllr Essex	Cllr Booton, Cllr Chandler, Cllr Chester, Cllr Khan, Cllr McKenna, Cllr Ritter and Cllr Thorne
8. Green	Cllr Proudfoot	
9. Green	Cllr Sinden	
10. Green	Cllr Torra	
11. Residents' Association	Cllr Harper	Cllr Harp and Cllr Hinton
12. Liberal Democrat	Cllr Elbourne	Cllr Kulka

Overview and Scrutiny Committee (Politically Balanced – Executive Members cannot be appointed to this Committee) 15 Members

	Appointment	Substitutes
1. Conservative	Cllr Baker	Cllr Cooper, Cllr Hudson and Cllr Tary
2. Conservative	Cllr Blacker	
3. Conservative	Cllr Buttironi	
4. Conservative	Cllr Dwight	
5. Conservative	Cllr Fairhurst	

6. Conservative	Cllr Green	
7. Conservative	Cllr Parnall	
8. Conservative	Cllr Sachdeva	
9. Green	Cllr Booton	Cllr Chandler, Cllr
10. Green	Cllr Khan	Chester, Cllr Essex, Cllr
11. Green	Cllr Proudfoot	McKenna, Cllr Sinden,
12. Green	Cllr Ritter	Cllr Thorne and Cllr Torra
13. Residents' Association	Cllr Harrison	Cllr Adamson, Cllr Bray
14. Residents' Association	Cllr Hinton	and Cllr Harp
15. Liberal Democrat	Cllr Elbourne	Cllr Kulka

Planning Committee (Politically Balanced) **15 Members** – Membership should be broadly representative of the geographic coverage of the Borough (excluding Members of the Executive).

	Appointment	Substitutes
1. Conservative	Cllr Baker	Cllr Buttironi, Cllr Dwight and Cllr Green
2. Conservative	Cllr Blacker	
3. Conservative	Cllr Fairhurst	
4. Conservative	Cllr Hudson	
5. Conservative	Cllr Parnall	
6. Conservative	Cllr Sachdeva	
7. Conservative	Cllr Stevens	
8. Conservative	Cllr Tary	
9. Green	Cllr Chandler	Cllr Booton, Cllr Chester, Cllr Essex, Cllr Khan, Cllr Proudfoot, Cllr Ritter and Cllr Sinden
10. Green	Cllr McKenna	
11. Green	Cllr Thorne	
12. Green	Cllr Torra	
13. Residents' Association	Cllr Harp	Cllr Adamson, Cllr Harper and Cllr Hinton
14. Residents' Association	Cllr Harrison	
15. Liberal Democrat	Cllr Kulka	Cllr Elbourne

Standards Committee (5 Members – Politically balanced, together with non-voting co-opted Members).

	Appointment	Substitutes
1. Conservative	Cllr Dwight	Cllr Kelly
2. Conservative	Cllr Hudson	
3. Green	Cllr Essex	Cllr Ritter
4. Residents' Association	Cllr Harp	Cllr Hinton
5. Liberal Democrat	Cllr Kulka	Cllr Elbourne
6. Horley Town Council	Cllr Hughes	
7. Salfords and Sidlow Parish Council	Cllr Lodge	

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