



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 designated 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.
