

**To:** Planning & Regulatory Committee **Date:** 30 October 2024

**By:** Planning Development Manager

**District(s)** Reigate & Banstead

**Electoral Division(s):**

**Redhill East**

**Mr Essex**

**Case Officer:**

**Charlotte Parker**

**Purpose:** For Decision

**Grid Ref:** 528311 150649

**Title: Surrey County Council Proposal RE24/00028/CON**

### **Summary Report**

**Site of Former Colebrook and Spectrum Noke Day Centres, Noke Drive, Redhill, Surrey RH1 1PT**

**Outline application for the erection of part 1, 4, 5 and 6 storey building for extra care accommodation, comprising self-contained apartments, staff and communal facilities, and associated parking with access from St Annes Drive and Noke Drive. Appearance and landscaping reserved.**

The application site is located close to Redhill town centre and railway station, on land owned by Surrey County Council. The site, with frontages to Noke Drive and St Annes Drive, has historically been used in connection with a number of community uses but the site has now been cleared and is unoccupied. The site is secured by boundary hoarding.

This is an outline application seeking self-contained extra care accommodation with associated facilities (indicatively 120 units). The application has been submitted by Surrey County Council under Regulation 3 of the Town and Country Planning General Regulations (1992). At this outline stage the planning considerations relate only to the principle of the development, including the layout, scale and means of access. The detailed design (appearance) and site landscaping are reserved matters which would be submitted at a later stage.

A total of 9 representations have been received on this application, including some which express support for re-use of the site as proposed. Objections relate primarily to the scale and height of the proposed building, its impact on neighbour amenity, lack of parking and environmental harm.

Reigate and Banstead Borough Council raised no objection, subject to a number of matters being addressed, and weight given in the planning balance to the proposal being contrary to Local Plan Policy RTC4, the loss of trees and less than substantial harm being caused to a designated heritage asset.

Other statutory and technical consultees have provided advice on a range of issues, and this has either been reflected in additional information submitted during the course of the application or in proposed conditions.

Officers are satisfied that development of this scale and nature could be satisfactorily accommodated on the site, subject to details which would be submitted at the reserved matters stage or required by condition. It has been concluded that the necessary tests have been met in relation to flood risk, and that subject to detailed design and the imposition of conditions, the development would be made safe for its lifetime without increasing flood risk elsewhere.

It is recommended that pursuant to Regulation 3 of The Town and Country Planning General Regulations 1992, the Committee grants outline planning permission for application ref: **RE24/00028/CON**, subject to the recommended planning conditions.

---

## **Application details**

### **Applicant**

SCC Property

### **Date application valid**

27 December 2023

### **Period for Determination**

27 March 2024 extended to 6 November 2024.

### **Amending Documents**

Heritage Assessment Rev 4.0 dated 26 February 2024

BNG Calculation Tool Rev 1.4 dated 8 February 2024

The Biodiversity Metric 4.0 Technical Annex 1: Condition Assessment Sheets and Methodology

Updated BNG Letter dated 8 February 2024

Response to Planning Comment AR Acoustics

Letter on Response to Environment Agency Comments dated 11 April 2024

Flood Risk Assessment Rev 1.2 dated 4 April 2024

Ecology Report dated August 2024

Biodiversity Metric 4.0 – Calculation Tool dated 19 August 2024

Archaeological Trial Trench Evaluation dated November 2022

Email from Agent Re Watermill Query dated 10 April 2024 (redacted)

Updated application form

Colebrook Day Centre - Flood Risk Assessment (Rev 1.5) dated 10 October 2024

Letter from Vail Williams (Supporting Information in relation to Flood Risk) dated 8 October 2024

---

### Summary of Planning Issues

This section identifies and summarises the main planning issues in the report. The full text should be considered before the meeting.

	<b>Is this aspect of the proposal in accordance with the development plan?</b>	<b>Paragraphs in the report where this has been discussed</b>
Principle and Need	Yes	41-59
Flood Risk, Drainage and Contamination	Yes	60-80
Layout, Design and Character	Yes	81-101
Residential Amenity	Yes	102-122
Highways, Access and Parking	Yes	123-137
Trees and Landscaping	Yes	138-149

Sustainable Design	Yes	150-162
Ecology and Biodiversity Net Gain	Yes	163-183
Air Quality	Yes	184-192
Heritage Assets	Yes	193-215

---

## **Illustrative material**

Site Plan

Plan 1 – Site Location and Application Site

Aerial Photographs

Aerial 1 – Surrounding Area

Aerial 2 – Application site

---

## **Background**

### **Site Description**

1. The application site is located close to Redhill town centre, immediately east of the railway station and postal sorting office adjoining it. It has frontages to Noke Drive and St Annes Drive, beyond which are residential areas of flats and houses on rising land to the south and north, with Carrington School (formerly the Warwick School) located to its eastern/north-eastern side. The Redhill Brook (which is partially culverted) runs close to the southern site boundary, and part of the site is located in Flood Zones 2 and 3 (a) and (b).
2. The application site covers an area of approximately 1.03ha and forms the lower section of a larger site (1.47ha) which has a long history of community use, including most recently as the Colebrook Day Centre. Some of the buildings previously occupying the site have been demolished and the site is enclosed by hoarding. The remaining single and two storey buildings on site are currently unoccupied, and the remainder of the site is laid to hardstanding or grass, with some trees, hedging and a small pond. There are access points to both Noke Drive and St Annes Drive.

## Planning History

3. Historically the site appears to have formed part of the grounds to St Annes, built as a school in the 19<sup>th</sup> century, then used as elderly persons' accommodation until its closure in 1975 and demolition in 1987.
  4. From the late 1970s the site has had a series of youth and community uses, with various permissions granted accordingly. Most recently the site has been occupied by the Colebrook Day Centre (which ceased use in February 2017) and the former Spectrum@Noke, which provided facilities for disabled people, autistic people, older people and those with other support needs and has since relocated to an alternative site (Longmead). The site also contained the Colebrook Garden Centre, which formed part of the community use of the site and closed in 2021.
  5. Prior approval was given in May 2021 under reference RE/21/0899/CON for the demolition of three buildings on site, which have now been demolished.
- 

## The Proposal

6. Outline planning permission is sought for the erection of a part single, part four, five and six storey building, to provide specialist housing designed for older people (Class C2). The building would contain up to 120 one and two bedroomed self-contained apartments, with communal and staff areas.
7. The housing would be for the affordable rental sector. Tenancies would be awarded in accordance with a nominations agreement between Reigate and Banstead Borough Council (as the local housing authority), Surrey County Council (as the local care authority) and a regulated social housing provider as the operator.
8. The proposed building would be formed of two main sections, one fronting St Annes Drive and the other (longer) section fronting Noke Drive, with a single storey link. As this is an outline application the precise design is not for consideration at this stage, however the illustrative plans indicate that the tallest (six storey) sections would be positioned at either end of the building, with it stepping down in height to the centre of the site and also at the southern end of the western 'wing' (close to the St Annes Drive/Noke Drive junction). Solar photovoltaic (PV) panels are indicatively shown on the higher sections of the roof, with a roof terrace shown on the single storey element. The main entrance to the building would be into the single storey element towards the western end

of the Noke Drive frontage. Secondary entrances would be formed to both the front and rear of the building.

9. The maximum height of the building would be 24m (six storey section), and it would have a footprint of 2838 sq.m and gross internal floorspace of 11761 sq.m. The building would be flat roofed. Ground floor apartments would have small private terraced areas (on supports to accommodate finished floor levels and flood risk mitigation), with balconies indicated to serve each of the upper floor units.
  10. The longest, south facing wing (Noke Drive elevation) would measure approximately 95m by 17m. The building would then dog-leg round (at single storey height) to a shorter wing (approximately 50m) fronting St Annes Drive.
  11. In addition to the self-contained apartments, the building shown illustratively would contain an entrance/reception area, kitchen, dining room, communal lounge, activity/therapy rooms, staff facilities, refuse and mobility scooter/cycle stores (all at ground floor level).
  12. The new building would be central to the site, broadly in the location of the previous buildings. Some existing trees would be retained. Hard and soft landscaping would be provided including seating areas (raised decking). Illustrative drawings show a network of paths and grassed areas to the wider site. Compensatory flood storage areas would be provided (523 m<sup>3</sup>) through the excavation of higher ground outside the existing flood extent, these being the far north-east part of the site and areas to the south of the proposed building.
  13. Access would be from St Annes Drive (utilising the existing access point), with an exit point onto Noke Drive (again utilising an existing access point). A total of 38 parking spaces would be provided to the north side of the site (to include three disabled spaces and a drop off bay).
  14. This application is an **Outline Application**, seeking permission for means of access, layout, and scale. Appearance and landscaping are Reserved Matters which would be submitted for approval at a later date, should outline planning permission be granted.
-

## Consultations and publicity

Consultees (Statutory and Non-Statutory)

### District Council

15. Reigate & Banstead Borough Council – No objection – however considers that further consideration needs to be given to the following matters:

- Consideration of what the remainder of the allocation site, which is omitted from this application site, will be used for.
- Further research regarding the possible existence of a historic watermill in the vicinity of the site
- Further consideration regarding the amount of car parking being provided.
- Address the concerns of the Lead Local Flood Authority

The case officer at Surrey County Council will need to weigh up the fact that the proposal is considered to be contrary to allocation Policy RTC4 of the Development Management Plan 2019, results in the loss of a number of grade 'B' trees and causes less than substantial harm to a designated heritage asset against the acknowledged benefits of providing 120 affordable extra care units.

16. Arboriculturalist – No objection - subject to the imposition of conditions.

17. SCC Archaeological Officer – No objection, no further archaeological work required.

18. County Ecologist – No objection subject to the imposition of conditions.

19. Environment Agency – No objection subject to the imposition of condition.

20. SCC Historic/Listed Buildings – Advises that there will be no impact on the setting of nearby Grade II listed buildings (Copyhold Cottages). Does not however agree with conclusion reached in the Heritage Statement that the impact of the scheme on the nearby Cavendish Road Conservation Area will be negligible (visualisations rely on tree cover which is considered 'poor practice'). However ultimately advises that as the building will not have a domineering affect on the locality, the harm would not be anything more than a low level of less than substantial harm under paragraph 208 of the NPPF. Great weight will need to be applied to this harm and it will need to be weighed against the public benefits from this scheme (which would be significant benefit to the community of the proposed use).

21. RPS Planning & Dev Ltd - Air Quality – No objection subject to the imposition of condition.
22. RPS Planning & Dev Ltd – Noise – No objection subject to the imposition of conditions.
23. Thames Water – No objection subject to the inclusion of an informative (nearby waste water assets)
24. SuDS & Consenting Team (LLFA) - No objection subject to the imposition of conditions.
25. Sutton and East Surrey Water – No views received.
26. SCC Transport Development Planning – No objection subject to the imposition of conditions.
27. Health and Safety Executive - Fire Safety – No comment made - The proposed height of the building appears to be below the threshold (18m). (NB. The HSE were consulted due to the outline nature of the application, and the requirement for consultation on applications for buildings of over 18m or 7 storeys in height).
28. Active Travel England – Refer to Standing Advice  
  
Amenity Groups
29. None consulted.  
  
Summary of publicity undertaken and key issues raised by public
30. The application was publicised by the posting of 3 site notices and an advert was placed in the local newspaper. A total of 244 owner/occupiers of neighbouring properties were directly notified by letter.
31. Nine letters of representation were received; two support the proposals and seven raise objections.
32. Objection has been raised on the following grounds:
  - Inconvenience during construction
  - Increase in traffic and congestion (St Annes Drive/Nokes Drive is the only ingress/egress route for a number of residential roads and also serves the Royal Mail sorting office and Carrington School)



- Height of the building unacceptable, will result in loss of sunlight to neighbouring properties
- Balconies will result in loss of privacy
- Insufficient parking resulting in displacement to surrounding roads
- Too many units, lack of infrastructure for additional older residents in the town
- No evidence to support the stated need for this amount of development
- Will result in hazard to highway safety (including to children attending Carrington School)
- Concern over air quality/emissions (caused by proliferation of high-rise buildings in the town)
- Will increase noise disturbance in gardens (Clyde Close) due to 'amphitheatre effect'
- Will result in overshadowing
- Loss of/harm to trees
- Will increase flood risk
- Drainage/sewerage capacity
- Harm to wildlife habitat

33. Support for the scheme has been expressed on the following grounds:

- Benefit to housing need
- Community/regeneration benefit
- The site has been empty for years, and it is about time it is redeveloped
- The previous use generated traffic, and as such traffic generated by the development is unlikely to be an issue

---

### Planning considerations

34. The guidance on the determination of planning applications contained in the Preamble/Agenda frontsheet is expressly incorporated into this report and must be read in conjunction with the following paragraphs.
35. In this case the statutory development plan for consideration of the application consists of the Surrey Waste Local Plan Part 1 – Policies and Part 2 – Sites, which together form the Surrey Waste Local Plan 2019-2033 (**SWLP**), Reigate and Banstead Local Plan: Core Strategy 2014 (RBCS) and Reigate and Banstead Local Plan: Development Management Plan 2019 (**RBDMP**).
36. Work commenced in 2023 on a new Local Plan, but due to the early stage of this work no weight can be afforded to any of the evidence gathered in the process of plan preparation to date.

37. In addition, Reigate and Banstead Borough Council has adopted relevant Supplementary Planning Guidance as follows; Local Character and Distinctiveness Design Guide SPD 2021 (**LCDDG**); Affordable Housing SPD 2020 (**AH**) and Climate Change and Sustainable Construction SPD 2021 (**CCSC**).
38. There is no Neighbourhood Plan in place for this area.
39. In considering this application the acceptability of the proposed development will be assessed against relevant development plan policies and material considerations.
40. In assessing the application against development plan policy it will be necessary to determine whether the proposed measures for mitigating any environmental impact of the development are satisfactory. In this case the main planning considerations are considered to be; the principle of the development, including in relation to the use of the land in relation to adopted policy; its impact on character of the area with particular reference to height, massing and design; impact on residential amenity, highways considerations; and whether flood risk has been appropriately mitigated.

## **PRINCIPLE AND NEED**

### **Surrey Waste Local Plan 2020**

#### **Policy 7 – Safeguarding**

### **Reigate and Banstead Core Strategy 2014 (RBCS)**

**Policy CS5 – Valued people and economic development**

**Policy CS6 – Allocation of land for development**

**Policy CS7 – Town and Local Centres**

**Policy CS8 – Area 2a Redhill**

**Policy CS10 – Sustainable Development**

**Policy CS12 – Infrastructure Delivery**

**Policy CS13 – Housing Delivery**

**Policy CS14 – Housing Needs of the Community**

**Policy CS15 - Affordable Housing**

### **Reigate and Banstead Development Management Plan 2019 (RBDMP)**

**Policy DES4 – Housing mix**

**Policy DES5 – Delivering High Quality Homes**

**Policy DES6 – Affordable Housing**

**Policy DES7 – Specialist Accommodation**

**Policy RTC4 – Colebrook**

**Policy INF1 – Infrastructure**

**Policy INF2 – Community Facilities**

## Reigate and Banstead Borough Council Affordable Housing SPD 2020

41. Paragraph 60 of the National Planning Policy Framework (2023) states:

*'To support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.'*

42. Paragraphs 61 and 62 set out how housing need should be determined, and the NPPF goes on to state in Paragraph 63:

*'Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.'*

43. A number of local plan policies are relevant to this application due to the site's location within Redhill town centre, and its established community use. Relevant strategic policies as set out in the Reigate and Banstead Core Strategy 2014 (RBCS) seek to promote and support continued economic prosperity and regeneration in the borough, including through the provision of community facilities (Policy CS5), and the allocation of land for a range of uses (Policy CS6). Policies CS7 and CS8 set out the hierarchy of town and village centres, and identify Redhill as the borough's primary town centre. Policy CS10 sets out the presumption in favour of sustainable development, including the prioritisation for development of previously developed land and land in built up areas. Policy CS12 sets out the Council's position in relation to infrastructure delivery, which includes resisting the loss of community facilities and encouraging the provision of new community facilities and services.

44. RBDMP Policies INF1 and INF2 also deal with infrastructure and community facilities respectively. Policy INF1 seeks to secure infrastructure provision where necessary and ensure that new development does not impact unacceptably on the local utilities network and Policy INF2 resists the loss of/encourages the provision of new community facilities.

45. RBCS Policies CS13, CS14 and CS15 set out how the housing needs of the borough will be met, including the provision of housing for all sections of the

community (including the elderly), and affordable housing. Several Reigate and Banstead Development Management Plan 2019 (RBDMP) policies also relate to the delivery of housing (Policy DES4, DE5, DES6 and DES7), relating to housing mix, the delivery of high quality homes, affordable housing and specialist accommodation respectively. The proposal, which would deliver affordable housing for the elderly, is considered to accord with these policy objectives.

46. RBDMP Policy RTC4 is a site specific policy, which allocates the former Colebrook site for a mix of residential and community uses, setting out a number of requirements in relation to flood risk, trees, design, the re-location/re-provision of community uses and impact on the nearby conservation area. The current application comprises only part of the site allocation, which covers an area of 1.37 ha and extends to the north. The omission of the northern section of the site has been highlighted by Reigate and Banstead BC in its comment on the application.
47. A small part of the eastern end of the site (nearest to Carrington School) is located within the Waste Consultation Area for the Patterson Court landfill site, the purpose of which is to ensure that new development is not in conflict with that land use in terms of amenity or other impact. Due to the degree of separation and intervening uses, it is not considered that the proximity of the Patterson Court site would have any material impact on occupiers of the new development (residential amenity is addressed in more detail below) (SWLP Policy 7).
48. Part of the site is located in Flood Zones 3 (a) and (b) which is identified as being land at the highest risk of flooding. The proposed development (for extra care housing) is also classed as 'More Vulnerable' as set out in Annex 3 of the NPPF (Flood risk vulnerability classification). The principle of development on land at high risk of flooding needs to address both the Sequential Test and Exception Test, in accordance with national guidance as set out in the NPPF. The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, and for this test to be satisfied it must be demonstrated that there are no reasonably available areas in low or medium risk areas. If this is passed, the two elements of the Exceptions Test must then be satisfied, these being that:
  - development that has to be in a flood risk area will provide wider [sustainability benefits to the community that outweigh flood risk](#); and
  - the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

49. It is considered that the applicant has demonstrated that both tests have been satisfied, taking into account the 'More Vulnerable' nature of the use. This will be addressed in detail in paragraphs 60-80 below.

50. Surrey County Council's (SCC) Cabinet approved an Accommodation with Care and Support (AwCS) Strategy on 16 July 2019. Underlying this Strategy is the significant strain being experienced by the care and support system, and the challenges being faced due to Surrey's ageing population and the lack of specialist accommodation which enables older people to remain and be cared for in their communities as their needs increase.

51. 'Extra Care' is a term applied to housing for older people, often (but not exclusively) in the social rented sector, provided in self-contained units with access to care, support, domestic, social, community and other services. SCC has identified that of the various types of specialist housing, extra care accommodation has the greatest shortfall between demand and provision, particularly in terms of affordable rented provision.

52. As part of its AwCS Strategy, SCC seeks to achieve a minimum of 25 extra care units per 1000 of Surrey's population of over 75s by 2030. This site has been identified along with a number of others in Surrey as being suitable for extra care housing. If approved, the delivery of around 120 extra care units as proposed would meet an identified future need in Reigate and Banstead and deliver against the target set in the Strategy.

53. The County Council has produced "planning guidance for accommodation with care for older people" (April 2024). The guidance refers to housing (C2) within care settings and states that the following elements should be provide:-

- support for older people with care and other needs;
- support for independent living ensuring residents remain active;
- support for residents to avoid admission into care homes as their needs increase;
- provision of facilities for residents such as craft rooms, communal lounge and dining room;
- provision of office space for secure record keeping;
- alarm system to call for support in cases of emergencies;
- best practice design standards, layout and accessibility in the overall design;
- 24/7 on-site support to residents and emergency care response;

54. As outlined in the Statement of Need accompanying this application (paragraph 3.07), extra care provision has been made in recent years in Reigate and

Banstead, with a number of other schemes in the pipeline having been granted planning permission. The tenure of these units is mixed (social rent/shared ownership, leasehold and private rental). The Reigate and Banstead planning profile for accommodation with care for older people (April 2024) identifies a growing need over time for affordable extra care housing, and across Surrey there remains a significant demand gap to be filled by SCC and partner organisations in the delivery of affordable extra care units.

55. The proposal would meet an identified need for accommodation which supports older people with care needs, enabling residents to live independently within their local community. Additional and/or more complex care needs would be available to residents should it be required. Communal facilities such as craft and therapy rooms, dining, lounge and kitchen areas would be provided, encouraging residents to participate in shared activities to promote health and wellbeing. A bespoke care package, suitable to meet the residents' needs, would be delivered by care workers. Staff would be on-site 24/7 to ensure that care needs can be met and emergencies responded to.
56. In terms of the proposed use, RBDMP Policy RTC4 allocates the site for residential use (approximately 110 homes, including potentially homes for older people) and new community uses, potentially including adult social care. As set out previously, the site has historically accommodated a variety of community uses, many of which have since been relocated to other sites in the area. This requirement of Policy RTC4 has therefore been met, and no specific need for alternative community uses to be accommodated on the site has been identified through consultation on this application.
57. On the basis that the current proposal would provide homes for older people, with an element of adult social care, it is considered that it would accord with the aims of Policy RTC4. The scheme's acceptability in relation to the other requirements (flood risk, trees, design and relationship with the conservation area) will be addressed under relevant subject headings below.
58. In response to Reigate and Banstead BC's comments in relation to the partial redevelopment of the allocated site, the scheme has been designed such that it would not sterilise use of the remaining part of the site. The merits of any proposal for that land would be assessed at that time, including in accordance with Policy RTC4.
59. The development of this site for up to 120 units would be in accordance with national and development plan policy which seeks to boost the supply of housing generally, and specialist housing for different groups in the community in particular – in this case older people. The proposal would also align with the aims of the

AwCS Strategy and make a contribution to closing the identified gap in the supply of affordable extra care housing across the County. The site is also very well located in relation to the range of facilities and services in Redhill town centre, including public transport links and retail provision.

## **FLOOD RISK, DRAINAGE AND CONTAMINATION**

### **Reigate and Banstead Core Strategy 2014 (RBCS) Policy CS10 – Sustainable Development**

### **Reigate and Banstead Development Management Plan 2019 (RBDMP) Policy CCF2 – Flood Risk Policy DES9 – Pollution and Contamination Land**

### **Reigate and Banstead Borough Council Climate Change and Sustainable Construction SPD 2021**

60. Paragraphs 165-175 of the National Planning Policy Framework (2023) sets out the role the planning system is expected to play in minimising the risk of flooding and mitigating its effects. Development should be directed away from areas at highest risk, and in determining applications LPAs should ensure that flood risk is not increased elsewhere.

61. Paragraph 173 states that:

*‘When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment [59](#). Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*

*(a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*

*(b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*

*(c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*

*(d) any residual risk can be safely managed; and*



*(e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

62. In order to minimise flood risk, including surface water flooding, Paragraph 175 states that:

*‘Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:*

*(a) take account of advice from the lead local flood authority;*

*(b) have appropriate proposed minimum operational standards;*

*(c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*

*(d) where possible, provide multifunctional benefits.’*

63. RBCS Policy CS10 requires that development is located such that it minimises flood risk, including through the incorporation of SuDS and compensatory measures where development takes place on a floodplain.

64. RBDMP Policy CCF2 seeks to minimise flood risk, including surface water flooding for which sustainable drainage provision should be made as part of development.

65. RBDMP Policy DES9 requires that where a site is known to be contaminated, or where there is a reasonable possibility of contamination, appropriate investigation, and where necessary mitigation and/or remediation will be required.

66. The application site is located close to the Redhill Brook, which runs east-west to the south of Noke Drive. A Flood Risk Assessment (FRA) (updated October 2024) has been submitted with the application, this concluding that as the proposed development is located in EA Flood Zones 2 and 3 (a) and (b), and that the proposed residential care home use is classified as ‘more vulnerable’ as defined in the NPPF (paragraph 169 and Annex 3), both the Exception Test and Sequential Test are applicable. The site is identified as being at medium risk of surface water flooding (access road and car parking area in the south-east corner of the site). It is also identified as being in an area with the potential for groundwater flooding to occur, however the FRA states that there has not been a specific groundwater flooding event at the site recorded, and the underlying soils



and geology provide good protection from groundwater flooding. The site is not located in a Source Protection Zone.

67. The Sequential Test seeks to direct new development to land with the lowest risk of flooding. Only where there are no reasonably available alternative sites should development take place in areas at high risk of flooding.
68. As this is an allocated site under RBDMP Policy RTC4, the Sequential Test was applied through the Strategic Flood Risk Assessment (SRFA) carried out as part of the Plan preparation process. An SFRA considers all sources of flooding including fluvial, surface water, groundwater, sewers and reservoirs within the study area, and enables a strategic overview to be taken of possible site options for development. The site was concluded to be suitable for development (residential and community use), as identified through the SRFA carried out in 2017.
69. Further analysis of the site carried out as part of the Plan preparation on behalf of Reigate and Banstead BC in January 2018 (updated May 2018) (Development Management Plan (Regulation 19) Sequential Test for Flood Risk (Appendix C.2) concluded that:
- ‘Given the location of the site, it also represents the only realistic opportunity for the delivery of extra care housing in and around the town centre. Development on this site could not therefore be accommodated on or redirected to land within the FZ1’.*
70. This report also highlighted the likely increase in need for extra care provision over the Plan period.
71. To satisfy the Sequential Test, the FRA states that no part of the building footprint would be located in the area at highest risk of flooding (Flood Zone 3b) which covers the south-west corner of the site. Continuing to apply the sequential approach to the design and layout of the building, whilst acknowledging that part of the building would be in Flood Zone 3a, the FRA goes on to state that the higher vulnerability elements (ie. sleeping accommodation units) would not be located in this area of higher risk. It also states that refuse & plant, staff area and community space have been positioned in a way to reduce vulnerability. The building has been designed such that finished floor levels are to be elevated 300mm above the 1% AEP (Annual Exceedance Probability) plus 20% climate change flood level (77.60 mAOD) to enable sleeping accommodation to be located at ground floor level within the lower (medium) risk part of the site.
72. As set out in the FRA, the proposed main access ramp (to the front/south-west

side of the building) would be located within Flood Zone 3b (functional floodplain). The detailed design of this feature would be for consideration at the reserved matters stage, and the FRA states that consideration is being given to whether this ramp could be permeable or raised above flood level to prevent the impediment of overland flows. On the basis that the detailed design of the ramp needs to be such that it both allows for the flow of water in the event of a flood, and meets the accessibility needs of those accessing the site, it is considered appropriate to impose a condition which requires details to be submitted for separate consideration.

73. Turning to the Exception Test, these are that: (1) development that has to be in a flood risk area will provide wider sustainability benefits to the community that outweigh flood risk; and (2) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
74. As set out in the FRA, as a brownfield site the proposed development is assessed in reference to the disused buildings and land on site, taking account of its location close to Redhill's town centre and train station which make it suitable for extra care accommodation. It states that no other more suitable sites were identified as available, and that it delivers a sustainable design that adds 120 self-contained extra care apartments, communal and amenity spaces. It states that there will be no adverse impacts to the site or surrounding area as a result of the proposals once mitigated for in the design. Biodiversity net gain is achieved in the proposed design, and that a holistic approach to design was considered for risks and opportunities on site. The proposed residential use of the site would provide additional extra care housing to the local area, and would be in line with the requirement for residential use as outlined in the RBDMP. The FRA concludes that the proposed development passes the exception test as it delivers additional adult extra care housing in Surrey on a disused brownfield site.
75. In terms of the safety of the site for the lifetime of its use, taking into account the 'more vulnerable' nature of its users, this has in part been addressed in relation to the design of the building as described above. In addition to this, the FRA contains sections on safe access and egress, and flood warning and emergency planning.
76. Modelling carried out as part of the FRA demonstrates that post development, the parts of the site at risk of flooding would be those to the south of the building. This is because the building itself would prevent the flow of water to the rear, apart from to its eastern end, where the compensatory storage areas would be located. As such, safe access and egress to the site (from St Annes Drive) would

be maintained, and any evacuation of the building could be carried out safely from exit points on the northern side of the building. It is however considered necessary to impose a condition requiring the submission of a flood warning and evacuation plan. This would detail all measures which would be necessary in the event of a flood event, to safely evacuate the building and (if necessary) provide onward transportation to an appropriate location.

77. Compensatory storage areas for floodplain lost as a result of the development would be provided, these totalling 1305 m<sup>2</sup> in area and 523 m<sup>3</sup> in volume (which achieves the level for level and volume for volume requirements of the Sequential Test and Exceptions Test). This would be provided in locations to the south of the building, and to its north-east side (where the site would be landscaped, shown on the landscape proving plan as traditional orchard and modified grassland). These areas would be achieved through the excavation of higher ground outside the existing flood extent.
78. The FRA cross refers to the Sustainable Drainage Systems (SuDS) Report (December 2023) which sets out how on-site risk would be mitigated and run-off managed, to include management strategies including a range of sustainable features (SuDS) - porous pavements and attenuation storage tanks. These measures collectively would restrict run-off to greenfield rates, and reduce the risk of downstream flooding to the Redhill Brook and the wider Redhill catchment, the report noting that the existing Colebrook site is currently draining surface water runoff unrestricted via two below ground surface water connections to the Redhill Brook.
79. These details have been reviewed by the LLFA who are satisfied that subject to the imposition of conditions the requirements of the NPPF, its accompanying PPG and the Non-Statutory Technical Standards for sustainable drainage systems are met. Thames Water have raised no objection, but have advised of the proximity of the site underground assets (15m) and requested that an informative is added accordingly. Subject to the imposition of conditions, the proposal is considered to meet the requirements of RBCS Policy CS10 and RBDMP Policy CCF2.
80. Land Condition and Ground Investigation Reports have been submitted with the application. These conclude that there are unlikely to be significant land contamination and land stability hazards present on site, and that the proposed residential use and its associated landscaping are achievable. No further site investigation and risk assessment is recommended. The Ground Investigation Report however contain a number of recommendations in relation to landscaping phase of the development, which should be required to be carried out via a condition (RBDMP Policy DES9).

## LAYOUT, DESIGN AND CHARACTER

### Reigate and Banstead Core Strategy 2014 (RBCS) Policy CS10 – Sustainable Development

### Reigate and Banstead Development Management Plan 2019 (RBDMP) Policy DES1 – Design of New Development Reigate and Banstead Local Character and Design Guide SPD (2021)

81. Paragraphs 131-141 of the National Planning Policy Framework (2023) seek to promote the creation of well-designed places. Paragraph 135 states that:

*‘Planning policies and decisions should ensure that developments:*

- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.’*

82. Further detailed guidance is set out in the National Design Guide (2019). This sets out the Government’s priorities for design in the form of ten characteristics, stating that the underlying purpose for design quality and the quality of new development at all scales is to create well-designed and well-

built places that benefit people at all stages of life (including the elderly) and communities.

83. RBCS Policy CS10 requires that development makes efficient use of land and is at an appropriate density, taking account of and respecting the character of the local area and levels of accessibility and services. It also requires that development contributes to the creation of neighbourhoods which are supported by effective services, infrastructure and transport options and which are designed to be safe, secure and socially inclusive.
84. RBDMP Policy DES1 requires all development proposals to be of a high quality design that makes a positive contribution to the character and appearance of its surroundings, promotes local distinctiveness and uses high quality building materials, landscaping and building detailing. Development is also required to have due regard to the layout, density, siting, scale, massing, height and roofscapes of the surrounding area, relationship with neighbouring buildings and views in and out of the site. It should also provide street furniture/trees and public art where this would enhance the public realm and/or reinforce a sense of place.
85. Reigate and Banstead BC's Local Character and Design Guide SPD (2021) encourages new development to reflect local character and distinctiveness, including through form and layout, landscaping and boundary treatment the appropriate use of materials and design features Development should also respect and reflect as appropriate the historic development of an area and its prevailing architectural style and character, and its landscape context.
86. This proposal is in outline, with layout, scale and access for consideration at this stage, and appearance and landscaping as 'reserved matters' for future consideration.
87. 'Layout' is defined in the National Planning Practice Guidance (NPPG) as 'the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development'. 'Scale' is defined as the 'height, width and length of each building proposed within the development in relation to its surroundings'.
88. As such, whilst the layout and overall scale of the development can be considered, the building's external appearance including - for example, the position of window openings and balconies, materials and other detailing - is not for consideration at this stage. Similarly, details of hard and soft

landscaping would be reserved for future consideration, though the spaces they would occupy form part of the 'layout' and can be assessed accordingly.

89. 'Access', defined as 'the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network', is also for consideration at this stage and would include the access routes (vehicular and pedestrian) and car parking area.
90. In terms of layout, the proposed building would replace the previous collection of buildings with one single building (comprised of two connected wings) which would arc across the site on an east/west axis. No objection is raised in this regard, as the site's previous layout was not designed as a single entity, and had instead evolved incrementally over time. Site coverage/density would increase considerably, however on the basis that this is highly sustainable urban site, it is considered appropriate to optimise the use of the site and maximise delivery of housing (height and massing will be considered below). Layout has also had to take account of the flood risk to parts of the site.
91. The building's footprint has been designed such that it addresses both the Noke Drive and St Annes Drive frontages, with the main entrance (pedestrian access) located close to the road junction. It is considered that this layout, combined with appropriate hard and soft landscaping to the site's frontages, would enable the building to integrate well with its surroundings. The development would also create active frontages to both road frontages, which would have a positive impact on the area. Vehicular access and parking/turning would be located to the north side of the building, with the remainder of the application site landscaped with a mix of planted, grassed and hard surfaced areas, trees, and provision of ancillary structures including seating.
92. In terms of scale, the building would be a four, five and six storeys in height, with one single storey section linking the flanking wings. The tallest sections are shown as being located on the outer 'wings' of the building, one fronting Noke Drive and the other fronting St Annes Drive. The height would then step down towards the centre of the building. The overall height of the building incorporates a finished floor level of 77.6 m AOD (300mm above the 1 in 100 year (1% plus AEP) plus climate change level.
93. It should be noted that whilst illustrative details have been submitted with the application, to show how the development might look on completion, they are not for consideration at this stage and are subject to change. The assessment below will be carried on this basis.



94. As set out above, the previous buildings on site were a mix of single and two storeys in height. They were generally utilitarian and institutional in appearance making no contribution to the public realm or street scene. By contrast, the proposed building has been designed to be 'outward facing', with principal elevations fronting and addressing the road frontages.
95. In terms of character, the site is located at a transitional point between the town centre and its more peripheral areas to the east/south-east of the station and railway line. Redhill town centre, west of the site, has recently been the subject of an extensive regeneration programme, which has included the provision of a significant amount of new flatted development within buildings of up to 13 storeys in height. Although separated from it by the railway line, there is clear intervisibility into the town centre from various points within and close to the application site, from where the high density nature of the town's recent development is apparent. Furthermore, immediately adjoining the site to the west is the postal sorting office which is a substantial three storey flat roofed building with considerable presence in the street scene. To the far eastern side of the application site is Carrington School, which has an extensive campus of buildings and outside spaces. Whilst visually the two sites are not closely related, the presence of the school and activity associated with it contributes to the mixture of uses in the area, and character accordingly.
96. To the north and south of the site, the principal land use is residential; predominantly in flatted form to the north (St Annes Rise, St Annes Way and St Annes Mount) and immediately to the south (Knights Place). These buildings have accommodation over three/four storeys. It is noted also that the buildings comprising the St Annes development to the north, whilst separated from each other by extensive areas of landscaping, are a full four storeys in height (plus pitched roofs) and which due to their elevated position, are very prominent in views including those at some distance. They also have a close visual relationship with the application site, due to their relative proximity and their visibility in various views of and from the site. It is considered that there is less of a visual link between the application site and the lower density residential areas to the south (beyond Knights Place), in part due to topography. This will be assessed further below in relation to heritage (see paras 193-215).
97. It is recognised that the site's development with a building of this scale and height would result in a significant change to its character and appearance. However, as has been noted above, this highly sustainable site is currently under-utilised and its relative openness does not positively contribute to the character of the area. Topographically it is also located at a low point between

the rising land of Redstone Hill to the south and St Annes Drive to the north, enabling development at height to be accommodated such that it would not be unacceptably prominent, taking into account also the massing and height of surrounding buildings, including those within the town centre to the west of the railway line. Detailed building design, materials and detailing would be for consideration as part of the reserved matters, and its acceptability would be assessed at that stage.

98. Furthermore, as set out in national planning guidance and National Design Guide, in addition to appearance and detailing, design encapsulates the function and connectivity of development, encouraging the provision of well-designed and well-built places that benefit people at all stages of life, including the elderly. The potential of sites should be optimised to accommodate and sustain an appropriate amount and mix of development, and should be safe, inclusive and accessible places which promote health and well-being.
99. As set out previously, this development seeks to meet an urgent need for modern, purpose-built affordable housing for the elderly. Extra care housing facilities needs to include both self-contained living accommodation, and ancillary and communal facilities for residents and staff. This requires a critical mass of development, and a layout which functions for this use. Such development should also be well located in relation to local facilities and services, with good connectivity to them including on foot, and by bicycle and mobility scooter.
100. As set out above, this site is very well located in relation to Redhill town centre and its extensive range of services and facilities, including public transport links, retail provision and leisure facilities. Its redevelopment would also result in an active frontage to Noke Drive, which it is considered would have a positive impact on the perception of safety and security in the area (including in relation to pupils and staff accessing Carrington School). There is also scope for the inclusion of some form of public art at the entrance, which would be prominently located in relation to the public highway. This could draw on the history of the site as part of the St Annes school and hospital, and would positively contribute to reinforcing a sense of place and local distinctiveness (RBDMP Policy DES1(4)).
101. The residential amenity of future residents, including through the provision of shared and private amenity space, will be addressed in more detail below. However, inasmuch as this relates to design, it is considered that this would be a well-designed and well-built development which would be fit for purpose, providing also an appropriate balance between making efficient use of land and safeguarding the character of the area.



## RESIDENTIAL AMENITY

### Reigate and Banstead Core Strategy 2014 (RBCS) Policy CS10 – Sustainable Development

### Reigate and Banstead Development Management Plan 2019 (RBDMP) Policy DES1 – Design of New Development Policy DES8 – Construction Management Policy DES9 – Pollution and Contaminated Land Policy OSR1 – Open Space in New Developments

102. Paragraph 191 of the National Planning Policy Framework (2023) states that:

*‘Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*

- (a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life ;*
- (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- (c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.’*

103. RBCS Policy CS10 requires that development is designed to minimise pollution, including air, noise and light.

104. RBDMP Policy DES1 requires that development does not adversely impact on the amenity of occupants of nearby buildings including through any overbearing, obtrusive, overshadowing effect, loss of privacy or overlooking. Development should also be accessible and inclusive for all users, and should create a safe environment, maximising opportunities for natural surveillance. Regard should also be had to the impact of access, circulation, turning space and parking provision on residential amenity (to include the visual impact of parked cars).

105. RBDMP Policy DES9 requires that development will only be permitted where it can be demonstrated that it will not result in a significant adverse impact on the natural or built environment; amenity; or health and safety (due to fumes, smoke, steam, dust, noise, vibration, smell, light or other form of pollution). It also states that development will not normally be permitted where existing forms of pollution are such that any unacceptable impact cannot be adequately mitigated.
106. Policy DES8 states that development will be expected to be carried out in a safe and considerate manner, and that Construction Management Statements should be submitted for certain types of development to ensure that potential impacts are identified and mitigated as necessary.

### **Impact on Amenity of Neighbouring Occupiers**

107. The closest residential properties to the application site are those to the south (Clyde Close, Venner Close and Knights Place), and the two residential blocks to the south side of St Annes Rise to the north of the site (Bronte Court and Lennox Court).
108. Knights Place is located close to the junction of Noke Drive and St Annes Drive, with two blocks (Guinevere House and Galahad House) facing towards the application site. These buildings have habitable accommodation over three floors (first, second and roofspace); the ground floor accommodates parking. Both blocks are set back from (and in a slightly elevated position relative to) the highway, behind a parking/turning area, trees and hedging, and the Redhill Brook. There would be a minimum separation distance of approximately 65m between windows serving these flats and the proposed units, and first floor terraced area. It is considered that this separation distance is sufficient to ensure that there would be no adverse impact on residential amenity due to any overbearing, obtrusive, overshadowing effect, loss of privacy or overlooking, taking into account that the proposed units would be provided at four or five storeys at this point, with some principal windows and balconies facing towards Knights Place.
109. To the east of Knights Place is a terrace of housing (Nos 2-6 Venner Close) which has its frontage facing north (towards Cavendish Road) and small rear gardens facing north towards the application site. Due to rising land to the south, these houses are in a slightly elevated position relative to the application site, and have windows serving main living accommodation over three storeys (the upper storey served by dormer windows). These properties would be in direct alignment with a five storey section of the proposed building, which it is indicated would have windows and balconies facing south towards Venner Close. However, the separation distance between the end of the rear gardens and the front of the

proposed building would be approximately 40m which is considered sufficient to adequately safeguard neighbour amenity in accordance with RBDMP Policy DES1. In addition, separating the two is an area of scrub and trees (some of which are evergreen) on either side of the Redhill Brook which provides dense screening to further filter views and intervisibility.

110. To the east of Venner Close is a group of properties in Clyde Close (Nos 3-13 inclusive), which also front to the north and have their rear elevations and gardens facing towards the application site. Due to the more open nature of the land between these properties and the application site, there is greater intervisibility at this point, and the rear of these properties and their garden areas are clearly visible from vantage points to the north. The proposed building at this eastern end would be five and six storeys in height, with windows and balconies facing south. It is however considered that residential amenity would be adequately safeguarded in accordance with RBDMP Policy DES1, the minimum separation distance between proposed gardens/balconies and the ends of rear gardens in Clyde Close being approximately 33m (and a greater distance between windows of approximately 42m). It is noted also that precise relationships would be considered at the reserved matters stage, and that design features such as obscure glazing for balcony enclosures could be incorporated if required.
111. A similar relationship exists between the site and houses/maisonettes at the end of Cavendish Gardens, albeit that these properties are at a slightly greater distance away (approximately 57m) and not in direct alignment
112. To the north of the site, the closest residential properties are flats (over four storeys) at Bronte Court and Lennox Court. Both buildings have units with principal windows and balconies on this side which due to their elevated position, have views down into the site.
113. Bronte Court is located to the north-east side of the site, close to the application site boundary. The closest relationship between the two buildings would be approximately 35m, which notwithstanding the proposed height of the building at this point (six storeys), is considered sufficient due to the degree of separation and lower ground level of the application site to ensure that there would be no adverse impact on residential amenity due to any overbearing, obtrusive, overshadowing effect. In terms of privacy and overlooking, the main elevations would be oriented towards the north-west and as such there would be no direct relationship between windows and balconies. Furthermore, although the site access (exit) would be located close to the site boundary at this point, all parking would be located further to the west with planting proposed for the areas north of the access and closest to the site boundary at its eastern side.

114. Lennox Court is located to the north-west of Bronte Court, further away from the application site but more centrally to its northern boundary. As such it is located at a greater distance from the proposed building (approximately 80m). Notwithstanding the clear views of the site from the upper floor flats in this block, it is considered that this distance is sufficient to ensure that residential amenity is adequately safeguarded.
115. The current access points to St Annes Drive and Nokes Drive, and these would become ingress and egress points respectively (as a result in a one-way system). As set out in the Transport Statement (assessed below) traffic levels are anticipated to be relatively low due to the nature of the use and the profile of future occupiers, and in the context of the site's location and existing traffic movements, it is considered that there would be no unacceptable loss of amenity to neighbouring properties due to noise or other disturbance resulting from vehicle movements.
116. To conclude in relation to neighbour amenity, whilst the development would result in some impact on neighbouring properties (as set out above), it is considered that an acceptable degree of privacy between habitable rooms and outdoor private amenity spaces would be maintained. No other significant harm to residential amenity has been identified, though as this scheme is currently in outline it would be necessary at the reserved matters stage to give careful consideration to the exact positioning of windows and balconies including through the use (as necessary) of obscure glazing or other design features. Landscaping details would also need to ensure that neighbour amenity is safeguarded. Conditions are also recommended to control/mitigate disturbance during construction (dust, noise and Construction Transport Management Plan).
117. In terms of the amenity of future occupiers, it is considered that each unit has been designed such that living conditions would be acceptable. Each unit would have outside living amenity space in the form of a private garden (ground floor) or balcony (upper floor), oriented to provide sufficient levels of daylight/sunlight. There would also be communal accommodation and amenity space. Amenity has also been considered in relation to the retention of trees and new planting (see below).

### **Impact from Noise**

118. An acoustic assessment has been submitted with the application. This considers the likely significant environmental effects from noise affecting the proposed development and existing receptors in the vicinity.

119. Based on an assessment of the noise climate (which identifies the main sources of noise as being road and rail noise, and plane fly-overs), the report concludes that subject to detailed design, noise levels within both internal and external (ie. within amenity areas) would be acceptable and in accordance with relevant guidance. The Council's noise consultant has recommended imposition of a condition requiring the submission of a further noise assessment which should demonstrate that acceptable noise levels would be achieved both internally and externally at the detailed design stage. The report also concludes that ground borne vibration (from the railway) is not expected to give rise to any adverse impacts.
120. The acoustic assessment also assesses noise emissions from the proposed development, the main source of which is expected to be mechanical services, which the indicative plans show as being located on the roof of the proposed building. The report identifies the closest noise sensitive receptors and determines typical background noise levels for these properties. It concludes that adverse impact from noise can be avoided with standard equipment and noise control measures, in accordance with policy and guidance. This includes guidance within Surrey County Councils Guidelines for Noise and Vibration Assessment and Control which states '*plant installations should be assessed following the guidance in BS 4142:2014.... It is recommended that for normal working hours (weekdays between 07:00 and 19:00 hours) that the difference between the rating level and the background sound level should be no greater than +5 dB, depending upon the context. Lower differences may be appropriate at other sensitive times of the day, depending upon the context.*' Should permission be granted, officers recommend that a planning condition is attached to the permission to reduce the risk of adverse noise impacts by stipulating these noise levels and requiring the submission of the details of external plant to be submitted and approved prior to installation.
121. The construction phase of the development would have implications for noise disturbance, but this can be mitigated with conditions restricting hours of construction and would only sustain for a short period of time.
122. Subject to conditions as set out in the above paragraphs officers are satisfied that the proposed development would not have an unacceptable impact on residential amenity and therefore accords with development plan policy in this regard.

## **HIGHWAYS, ACCESS AND PARKING**

**Reigate and Banstead Core Strategy 2014 (RBCS)**  
**Policy CS10 – Sustainable Development**  
**Policy CS17 – Travel Options and Accessibility**

**Reigate and Banstead Development Management Plan 2019 (RBDMP)**

**Policy DES1 – Design of New Development**  
**Policy TAP1 – Access, Parking and Servicing**

123. Paragraph 114 of the National Planning Policy Framework (2023) states:

*'In assessing.....specific applications for development, it should be ensured that:(a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

*(b) safe and suitable access to the site can be achieved for all users;*

*(c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code ; and*

*(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.'*

124. It goes on the state in Paragraph 115 that:

*'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*

125. And in Paragraph 116 that:

*'Within this context, applications for development should:*

*(a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

*(b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*

*(c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*



*(d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*

*(e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.'*

126. RBCS Policy CS10 requires that development is located such that it minimises the need to travel, whilst increasing opportunities to walk, cycle or use public transport, including as part of the green infrastructure network.
127. RBCS Policy CS17 seeks to manage demand and reduce the need to travel, and facilitate sustainable transport choices.
128. RBDMP Policy TAP1 requires that all development provides safe and convenient access for all road users, including through design and layout, and provides parking in accordance with adopted standards unless evidence is provided to support lower provision. Development should incorporate pedestrian and cycle routes within and through the site, linking to the sustainable transport network where possible, especially in town centres. Development which has an unacceptable impact on highway safety and capacity will be resisted, taking into account any proposed mitigation.
129. RBDMP Policy DES1 requires that development makes adequate provision for access, servicing, circulation and turning space and parking, taking account of the impact on local character and residential amenity, including the visual impact of parked cars.
130. Existing vehicular access to the site is from St Annes Drive, a single carriageway road with a 30mph speed limit and Noke Drive, a single carriageway, no-through road that provides access to Carrington School at the eastern end.
131. It is proposed to retain vehicular access points on both St Annes Drive and Noke Drive; access to the site would be via the St Annes Drive entrance with egress to Nokes Drive (slightly realigned from existing position). Internally the access road would run east/west, north of the proposed building and close to the northern edge of the site. A total of 38 parking spaces would be provided, to include three disabled parking spaces, in addition to which there would be a drop-off area. All spaces would be provided with electric charging points.
132. Separate pedestrian access points to the site would be formed to the Noke Drive frontage, these being the main entrance and secondary entrances to facilitate direct access to the residential units. Mobility scooter and bike storage would be provided (adjacent to the car park).

133. As set out in the application details, eight of the parking spaces would be allocated to staff, with the remaining 30 spaces available for residents. It is stated that demand would depend on occupancy, which would vary depending on the number of residents and their respective carers. It is also stated that as a comparison, similar residential (retirement flats) sites have been reviewed using the TRICS database to understand typical parking accumulation, and that to consider maximum parking accumulation (the maximum number of vehicles parked at any one time within the hour), a worse-case scenario has been considered which assumes that vehicles arriving and leaving within the hour would be parked at the same time. Although not explicitly referenced in the Transport Statement (TS), schemes such as car clubs can be appropriate for extra care facilities, as they can give additional flexibility in terms of providing residents with access to a car.
134. In terms of vehicle movements, as set out in the Transport Statement, the proposed development would result in a maximum of 19 two-way vehicle trips in the AM peak (09:00-10:00), with the peak for trips being outside network peak hours. The TS concludes that the development would have a negligible impact on the local highway network.
135. For parking, the overall conclusion of the Transport Statement is that given the small scale of the proposed development, the anticipated low scale of vehicle trip generation, the highly sustainable location, close proximity of the public car parks, and the onsite parking, any increase in parking demand due to the development is considered likely to be minimal. As set out above, the site is very well located in relation to local services and public transport links.
136. The Council's TDP officer has raised some concern over the relatively low level of parking provision, the pressure on local on-street parking and the lack of information in relation to the allocation of parking to residents. A condition has therefore been recommended requiring the submission of a car park management plan which would, amongst other requirements, set out how spaces would be allocated to residents.
137. It has been confirmed by the Council's TDP Officer that subject to the imposition of this and a number of other conditions, the application is acceptable on safety, capacity and policy grounds, and accords with relevant guidance (Surrey's Local Transport Plan 4, Healthy Streets guidance and Surrey Parking Standards).

## **TREES AND LANDSCAPING**

**Reigate and Banstead Core Strategy 2014 (RBCS)**  
**Policy CS2 – Valued Landscapes and the Natural Environment**  
**Policy CS10 – Sustainable Development**



**Reigate and Banstead Development Management Plan 2019 (RBDMP)  
Policy DES1- Design of New Development  
Policy NHE3 – Protecting Trees, Woodland Areas and Natural Habitats**

**Reigate and Banstead Local Character and Design Guide SPD (2021)**

138. Paragraphs 131-141 of the National Planning Policy Framework (2023) seek to promote the creation of well-designed places and highlight the importance of appropriate and effective landscaping as part of this wider objective.
139. With specific reference to trees, it states in Paragraph 136:  
*‘Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.’*
140. RBCS Policies CS2 and CS10 seeks to protect and enhance the Borough’s green fabric, including (f) urban green spaces, green corridors and site specific features which make a positive contribution to the green fabric and/or coherent green infrastructure.
141. RBDMP Policy NHE3 seeks to protect trees, woodland areas and natural habitats, resisting the loss of protected trees (TPOs) and higher quality trees (category A and B), unless the need for and benefits of the development in that location clearly outweigh the loss. Replacement tree and hedge planting, where required, should be of appropriate species and planted such that trees can reach optimum size. RBDMP Policy DES1 seeks to support development which provides street furniture/trees and public art where it visually enhances the public realm and/or reinforces a sense of place. Development should also incorporate appropriate landscaping to mitigate its impact and complement its design.
142. Reigate and Banstead BC’s Local Character and Design Guide SPD (2021) encourages new development to reflect local character and distinctiveness, including through the retention of trees and landscape features, and the introduction of new features. It also contains an appendix setting out

appropriate nature tree and shrub species for the different geological areas of the Borough (the site being in the Wealden Greensand area).

- 8
143. The site is covered by a Tree Preservation Order RE560 (Land at St Annes, Redstone Hill, Redhill - 1988). The Order covers 93 individual trees and seven groups, within an area which includes the St Annes development to the north of the application site. The majority of these trees are outside the application site, the plan forming part of the Order showing seven Lime trees (T76, T77, T78, T80, T81, T82, and T83), one Sycamore (T79) and three Prunus (T87, T88, T89) on the southern and western boundaries of the application site. The only one of these trees shown remaining on the site is a Lime at the junction of Noke Drive and St Annes Drive. This tree would be retained as part of the development.
  144. Eleven individual trees (three Lime T11, T21 and T50; one Silver Birch T14; one Japanese Rowan T15; one Corkscrew Willow T16; one Sycamore T18; one Leyland Cypress T20 and one Horse Chestnut T49) and one group of Sycamore (G19.1) are proposed to be removed. They are a mix of Category B and C trees. All these trees would be removed to facilitate the erection of the building, or formation of hard surfacing. The remainder of the trees assessed in the AAIA would be retained, some with pruning works to be carried out.
  145. It is recognised that RBDMP Policy NHE3 and its supporting design guidance seek the retention of higher quality trees as part of any new development proposals, and that this scheme would result in the removal of five individual trees and one group which are Category B trees, including trees which are prominent in the public realm (on the Noke Drive frontage). However, whilst these trees may have some value, including within the street scene, it is not considered that they make a significant contribution to the character of the area. Furthermore, as set out in the application details, a total of 28 new native trees would be planted as part of the landscaping for the new development, including species to form a new 'orchard' areas (to be dealt with as a reserved matter). Many of these trees would be located on the Noke Drive and St Annes Drive boundaries, and as such would represent a significant enhancement to the character and appearance of the site.
  146. As set out in the Arboricultural Appraisal and Impact and Assessment (AAIA) submitted with the application, the corner of the proposed building would result in some incursion into the root protection area of one retained tree (G19.3 Sycamore), for which a bespoke foundation design would be required. Some RPA incursion would occur during construction (including demolition and groundworks), for which a sensitive methodology under supervision is required (as set out in the method statement forming part of the AAIA). Where new surfaces are proposed within RPAs, no-dig construction

techniques should be used, with a cellular confinement system introduced to protect tree roots where existing surfaces have been removed. Tree protection measures as shown on tree protection plans (for the demolition phase and construction phases), and are set out in the method statement.

- 147. Although indicative only at this stage, the illustrative landscape masterplan submitted with the application shows the overall strategy which would be applied to the landscaping of the site. Boundary hedging (native planting) would be formed/supplemented to boundaries, with a number of trees and orchard areas, as set out above. Further into the site planting would be in the form of grassed areas and shrub beds, intersected by a network of paths. An existing pond would be retained and enhanced. Each ground floor garden area would be laid partially to grass (with a patio area), some enclosed with hedges. Hard surfaced areas would be a mix of tarmac (access road and parking areas), and paving.
- 148. The County Council’s arboricultural officer advises that the proposed scheme would result in low-medium arboricultural impact, and raises no objection provided that a net gain in tree numbers and diversity is achieved and tree planting/landscaping plans are submitted. This advice is also subject to the suitable protection during construction of any protected or otherwise retained trees, the use of suitably sensitive methodology during construction and an appropriately robust planting and aftercare regime being out in place, which would be secured by condition.
- 149. Taking all the above into account, it is considered that both the proposed removal of trees and the proposed landscape strategy (the detail of which would be agreed at the reserved matters stage) are acceptable for the site, striking an appropriate balance between tree retention and providing an appropriate environment for future occupiers of the site, including those with limited mobility. In addition, it is considered that the proposed landscaping strategy has the potential to enhance the site’s appearance and character, at this prominent edge of town centre location.

**SUSTAINABLE DESIGN AND CONSTRUCTION**

**Surrey Waste Local Plan 2020**

**Policy 4 – Sustainable Construction and Waste Management in New Development**

**Reigate and Banstead Core Strategy 2014 (RBCS)**

**Policy CS11 – Sustainable Construction**

**Reigate and Banstead Development Management Plan 2019 (RBDMP)**

**Policy DES1 – Design of New Development**

**Policy DES8 – Construction Management**

**Policy CCF1 – Climate Change Mitigation**

## Reigate and Banstead Borough Council Climate Change and Sustainable Construction SPD 2021

8

150. Paragraphs 158-164 of the National Planning Policy Framework (2023) sets out the role the planning system is expected to play in supporting the transition to a low carbon future in a changing climate. As part of this, it states in Paragraph 162 that:

*'In determining planning applications, local planning authorities should expect new development to:*

*(a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and*

*(b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.*

151. SWLP Policy 4 seeks to minimise waste generated during the construction, demolition and excavation phase of development, maximise opportunities for re-use and for the recycling of such waste, encourage the provision of on-site facilities to manage the waste arising during the operation of the development and storage facilities to facilitate the reuse and recycling of waste.
152. RBCS Policy CS10 requires development to minimise the use of natural resources and contribute to a reduction in carbon emissions by re-using existing resources, maximising energy efficiency, minimising water use, and reducing the production of waste, including through sustainable construction methods. RBCS Policy CS11 seeks to encourage sustainable construction.
153. RBDMP Policy CCF1 requires that new residential development incorporates water and energy efficiency measures, states that the design of buildings should maximise opportunities for energy saving and encourages the use of sustainable construction methods and materials.
154. A Sustainable Design and Construction Statement has been submitted with the application. This states how the various strands of national and local policy encompassing sustainability in all its forms are reflected in the proposals. These include; operational energy; embodied carbon; biodiversity and ecology; adaption and resilience; health and wellbeing; connectivity; social value; resource efficiency; and construction waste.

155. A number of key Surrey County Council documents forming part of its Organisation Strategy are cited, including its Community Vision for Surrey in 2030, which includes the desire for Surrey to be a great place to live, work and learn, and a place where communities feel supported and people are able to support each other. It also cites the Council's four key priorities - growing a sustainable economy so everyone can benefit; tackling health inequality; enabling a greener future; empowering communities, as well as the Council's Environmental Policy and Action Plan, its Climate Change Strategy and Action Plan, Local Transport Plan and Sustainable Construction Standing Advice Note.
156. Measures proposed in the Statement include those relating to the design of the building, to ensure that it is energy efficient, minimising heat loss and utilising low carbon energy systems (with an ambition to achieve net zero carbon in operation). It is proposed also to incorporate air source heat pumps systems and solar PV panels to the roof. Other efficiencies would be sought through the use of measures such as the installation of efficient fittings to reduce water consumption.
157. A Resource Management Plan (RMP) would be developed, which would set out key objectives for achieving efficient use of material resources and to reduce the amount of waste produced through construction activities on site, in line with the Surrey Waste Local Plan 2020. In accordance with the principles set out in Policy S4 of the SWLP, and in response to the relevant regulatory, policy and guidance context, it is stated that the RMP should set out several strategies to reuse, recycle or recover at least 90% of construction and demolition waste. The submission of these details would be required by condition.
158. For the detailed design stage (reserved matters) embodied carbon reduction strategies and circular economy principles would be explored and implemented to reduce overall waste generation, and that compliance with the waste hierarchy is also embedded (ie. through the provision of accessible waste storage with containers for different waste streams).
159. Improved health and wellbeing would be achieved through the project as a whole, as residents with extra needs would be able to better access support to enhance their quality of life, including through communal living and the social cohesion that would bring. The building has been designed such that it focuses on indoor air quality, and the provision of sufficient daylight, together with the provision of shared and private outdoor amenity space.

160. Enhancing biodiversity would be achieved through landscaping design, the planting for which would include a range of species with ecological value and measures to create a range of natural habitats.
161. The incorporation of Sustainable Drainage System techniques (SuDS) would build in climate change resilience. Various measures would be incorporated to encourage active travel, and reduce car use (the site is close to Redhill town centre and its services and facilities). 100% provision would also be made for electric vehicle charging points.
162. It is considered that subject to the implementation of the range of measures set out above, the proposal meets national and local policy objectives in relation to sustainable construction.

## **ECOLOGY AND BIODIVERSITY NET GAIN**

### **Reigate and Banstead Core Strategy 2014 (RBCS) Policy CS10- Sustainable Development**

### **Reigate and Banstead Development Management Plan 2019 (RBDMP) Policy NHE2 – Protecting and Enhancing Biodiversity and Areas of Geological Importance Policy NHE4 – Green and Blue Infrastructure**

### **Reigate and Banstead Local Character and Design Guide SPD (2021)**

163. Paragraphs 180-188 of the National Planning Policy Framework (2023) seek to ensure that planning policies and decision making contribute to and enhance the local and natural environment. In particular, they should seek to minimise impacts on and provide net gains for biodiversity, ensuring that any harm to biodiversity is adequately mitigated. If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused (Paragraph 186 (a)).
164. RBCS Policy CS2 seeks to protect and enhance the Boroughs valued landscapes and natural environment, including the Mole Valley Gap to Reigate Escarpment SAC, SSSIs and green infrastructure generally.
165. RBCS Policy CS10 requires that development is designed such that avoids adverse effects on wildlife, and reflects the need to adapt to climate change, including in relation to ecology.



166. RBDMP Policies NHE2 and NHE4 seeks to protect and enhance biodiversity and promote the provision of (and access to) green and blue infrastructure. In particular, Policy NHE2 states that internationally designated sites including the Mole Gap to Reigate Escarpment SAC will be provided the highest level of protection, and that development proposals which are likely to have a significant effect on these sites, either individually or in combination with other development, must be accompanied by an Appropriate Assessment and will only be permitted where the proposed development will not have an adverse effect on the integrity of the site. Proposals for major developments should also have regard to the possibility of Bechstein's Bat using the site.
167. Reigate and Banstead BC's Local Character and Design Guide SPD (2021) encourages new development to reflect local character and distinctiveness, and development that contributes to and enhances the natural and local environment, and providing net gains for biodiversity.
168. Although this is an outline application and landscaping is a reserved matter, to accord with policy an assessment needs to be made of the impact of the development on biodiversity including any protected species.
169. A Preliminary Ecological and Biodiversity Net Gain Assessment (PEA and BNG) has been submitted. This sets out the ecological constraints of the site, whether any mitigation measures are likely to be required, any additional surveys which may be required, and opportunities for ecological enhancement. It also sets out the baseline BNG unit score for the area surveyed. An Ecology Report (August 2024) has also been submitted, which updates and expands on the PEA.
170. Three statutory designated sites were recorded within 2 km of the site, including one Site of Special Scientific Interest (SSSI) and one Local Nature Reserve (LNR). Eight non-statutory designated sites, comprising Sites of Nature Conservation Importance (SNCI) were recorded within 2 km of the survey area, the closest being the Holmethorpe Sandpits Complex SNCI (approximately 200m to the east). The site is not within a Biodiversity Opportunity Area (BOA), however four BOAs are located within 2km of the survey area (WG11 Holmesdale being located 210m from the survey area).
171. The site is also located 1.8km from, and within the Impact Risk Zone (IRZ) of, the Mole Gap to Reigate Escarpment SSSI. It is also located 2.6km from the Mole Gap to Reigate Escarpment Special Area of Conservation SAC.
172. Eleven UK habitat classification types were recorded on site during the field survey (neutral grassland; modified grassland; other hedgerow; buildings;

developed land/sealed surface; artificial unvegetated/unsealed surface; built linear feature – fence; bramble scrub; mixed scrub; scattered scrub; lines of trees; standing open water). These habitats have the potential to support the following protected species or species of conservation concern: invertebrates, reptiles, badgers, amphibians (including Great Crested Newt), nesting birds, other mammals and foraging bats.

173. The ecology report screens the development for impacts on the SAC and SSSI, concluding that (1) it would not result in a habitat loss within the SAC or SSSI as the survey area is not directly or indirectly connected to the SSSI or SAC; and (2) it would not adversely impact Annex I or Annex II species, directly or indirectly, as there are unlikely to be recreational impacts due to the distance from the site; no Bechstein's bats were recorded on site (and due to the requirement for dark woodlands do not provide appropriate habitat for commuting, foraging or roosting); and there is a lack of connectivity for Great Crested Newt populations. On this basis, the report concludes that the SAC and SSSI will not be adversely affected by the development, and an appropriate assessment under the Habitat Regulations is not required. It is also noted that an assessment under the Habitats Regulations would have been carried out as part of the preparation of the RBDMP, which allocated this site for residential development.
174. In terms of protected species and species of conservation concern, there is one waterbody (pond) on the application site which have been assessed for its suitability for supporting Great Crested Newt (there is another site on the wider Colebrook site, but outside the application site). Habitat suitability surveys were carried out at both ponds in 2022, and with updated survey work carried out on the pond within the application site in April 2024. Both were concluded to be of below average suitability for GCN.
175. The site does have suitability for reptiles and mammals (including badger and bats) and without mitigation the proposed development could result in generalised impacts if mitigation is not considered (these are set out in paragraph 6.1.3 of the PEA).
176. Reptile survey work was carried out in May 2024, and none were recorded. The survey area supports suitable badger habitat (including setts) within mixed scrub and hedgerows, although no activity was recorded during survey work carried out in 2021, and again during a walkover in April 2024.
177. Two buildings were initially identified in 2021 as having suitability for roosting bats, although no bat species were identified at that time. Updated survey work was carried out in May 2024, which included an assessment of building B1 (no



roosting bats were recorded). A ground level roost assessment was carried out for a number of trees, with further aerial inspection carried out as necessary, it being concluded that there was low suitability for roosting bats. It is recommended that mitigation for potential loss of habitat is provided through the provision of bat boxes. Lighting should also be designed to ensure minimal impact on bats.

178. A number of non-native and invasive plant species were recorded on site, and it is recommended that these are removed to prevent them from escaping into the wider countryside. No rare/notable plant species were recorded on site.
179. As set out above, RBDMP Policy NHE2 expects development to be designed, where possible, to achieve a net gain in biodiversity. Although the submission of this application predates the introduction of mandatory Biodiversity Net Gain (BNG) in February 2024 as enacted by Schedule 14 of the Environment Act 2021 (which inserted Section 90A into the Town and Country Planning Act 1990), weight is given to this provision which seeks all new development to achieve a net gain of 10%.
180. As set out in the application details (Updated BNG Assessment Letter February 2024), an assessment has been carried out which evaluates the baseline biodiversity units and identifies possible scenarios for habitat enhancement and creation, and the potential net gain in biodiversity units that this would achieve (based on the submitted landscape plan). Biodiversity net gain, including assessment and habitat classification, is calculated and interpreted following eight accepted principles and rules and supported by good practice principles and code of practice that detail, among other things, how to implement biodiversity net gain good practice principles within each stage of a development project's life cycle.
181. The broad habitat types in the survey area have been set out above. Habitat retention, enhancement, and creation opportunities (as detailed in the landscape plan) comprise:
- Creation of modified grassland
  - Creation of other neutral grassland
  - Creation of species rich hedgerows
  - Creation of bioswale (to south side of site)
  - Creation of new tree planting (native and orchard trees)
  - Retention and enhancement of pond
  - Creation of vegetated gardens and shrubs

182. Applying the BNG metric 4.0, a habitat based approach used to assess an area's value to wildlife, (updated calculations August 2024), it is calculated that the development would result in a 40.88% increase in habitat units and 302.92% increase in hedgerow units. On this basis it is considered that sufficient information has been submitted to conclude that the proposal would meet policy requirements in relation to ecology and BNG.
183. The County Ecologist has confirmed that the application is acceptable, including in relation to BNG, subject to the imposition of conditions.

## **AIR QUALITY**

### **Reigate and Banstead Core Strategy 2014 (RBCS) Policy CS10 – Sustainable Development**

### **Reigate and Banstead Development Management Plan 2019 (RBDMP) Policy DES9 – Pollution and Contaminated Land**

184. Paragraph 191 of the NPPF (2023) requires that planning policies and decisions ensure new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.
185. Paragraph 192 states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
186. RBCS Policy CS10 requires that development is designed to minimise pollution, including air, noise and light, and to safeguard water quality.
187. RBDMP Policy DES9 requires that development will only be permitted where it can be demonstrated that it will not result in a significant adverse impact on the natural or built environment; amenity; or health and safety (due to fumes, smoke, steam, dust, noise, vibration, smell, light or other form of pollution). It also states that development will not normally be permitted where existing forms of pollution are such that any unacceptable impact cannot be adequately mitigated.

188. The applicant has submitted an Air Quality Assessment, which presents a review of baseline air quality conditions in the vicinity of the application site and provides an assessment of the potential local air quality effects associated with its construction and operation.
189. The report correctly identifies that the application site is not in an Air Quality Management Area (AQMA). Reigate and Banstead Borough Council has declared nine Air Quality Management Areas (AQMAs), the closest to the site being 60m to the south-west of the site, encompassing roads and properties within Redhill town centre.
190. The key air pollutants addressed in this report are nitrogen dioxide (NO<sub>2</sub>) and fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), as these pollutants are the most likely to be present at concentrations close to or above national air quality criteria in an urbanised environment.
191. A detailed air quality assessment for the operational phase of the development was carried out using a dispersion model, and it was concluded that it is not expected to have a significant effect on local air quality, with concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> being below AQS targets (based on an operational date of 2028).
192. The report highlights that the construction phase of the development has the potential to generate dust and PM<sub>10</sub> emissions, which may have a short-term adverse impact at nearby human health receptors. Suitable best practice mitigation measures, proportionate to the highest risk of dust impacts (MEDIUM), should be applied during the construction phase by the appointed contractor. Officers recommend that a condition is applied if planning permission is granted requiring the submission of a Dust Management Plan.

## **HERITAGE ASSETS**

**Reigate and Banstead Core Strategy 2014 (RBCS)  
Policy CS4- Valued Townscapes and the Historic Environment**

**Reigate and Banstead Development Management Plan 2019 (RBDMP)  
Policy NHE9 – Heritage Assets**

**Redstone Hill Conservation Area Appraisal draft December 2013  
Reigate and Banstead Local Character and Design Guide SPD (2021)**

193. Paragraph 200 of the National Planning Policy Framework (2023) states that:

*'In determining applications, Local Planning Authorities (LPAs) should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.'*

194. It goes on to advise that in determining applications, LPAs should identify and assess the particular significance of any heritage asset that may be affected by the development, taking account of any available evidence and any necessary expertise.

195. Paragraph 205 states:

*'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.'*

196. Paragraph 208 goes on to state:

*'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'*

197. And paragraph 209 states:

*'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'*

198. RBCS Policy CS4 requires that development is sensitively designed to respect, conserve and enhance the historic environment, including heritage assets and their settings.

199. RBCLP Policy NHE8 requires development to protect, preserve and, where possible, enhance the Borough's designated and non-designated heritage assets and sets out a number of criteria accordingly. Proposals affecting Conservation Areas must pay particular attention to those elements that make a positive contribution to the character, and setting, and special architectural or historic interest of the area. For sites over 0.4ha, an archaeological assessment, and where appropriate a field evaluation, will be required to inform the determination of a planning application.
200. Reigate and Banstead BC's Local Character and Design Guide SPD (2021) encourages new development to reflect local character and distinctiveness, including through form and layout, landscaping and boundary treatment the appropriate use of materials and design features. Development should also respect and reflect as appropriate the historic development of an area and its prevailing architectural style and character, and its landscape context.
201. The only designated heritage asset within the 250m study area identified in the Heritage Assessment submitted with the application are Copyhold Cottages (Grade II listed), which are located 80m to the east of the application site. The cottages, now a single dwelling, derive their significance from their age and construction (timber framed cottages dating from the early 17<sup>th</sup> century), and relatively open setting on the edge of the urban area, having been located in open countryside before the development of Redhill in the 19<sup>th</sup> century.
202. As set out in the Heritage Assessment, there is some intervisibility between the application site and Copyhold Cottages, which has the potential to impact their setting. Due to the degree of separation between the two, and the existence of intervening vegetation, the HA concludes that there would be negligible impact on the significance of Copyhold Cottages. The Council's Historic Buildings Officer (HBO) concurs with this conclusion, advising that much of the open landscape around the cottages has been replaced with suburban housing and that its setting reveals little about its significance. On that basis he concludes that there will not be any impact on the listed buildings.
203. The HA also identifies that there are eleven non-designated heritage assets located within 250m of the application site. These have been identified through the HER, three being of particular interest due to their proximity to the site; (1) a section of wall at Knights Place; (2) a former gas works 40m west of the applications and (3) the former St Annes Hospital to the north (demolished in 1987). The HA concludes that as all three have been replaced by modern housing, no impact is identified.

204. In addition to these non-designated heritage assets, there are a number of locally listed buildings close to the application site, as identified in the List of Buildings of Architectural and Historic Interest produced by Reigate and Banstead Borough Council (Sixth Edition dated May 2014). To the west (75m) and south west (185m) respectively are the central platform at Redhill Station (75m) (mid 19<sup>th</sup> century, with cast iron columns) and the former railway hotel (more latterly the Lakers Hotel, and now Toby Carvery) (built C1844 of local sandstone). Both assets have significance in relation to the 19<sup>th</sup> century development of Redhill town centre and the railway, but in neither case is it considered that their setting will be impacted by the development.
205. Approximately 80m to the south are Nos 10 and 12 Cavendish Road; No. 10 dates from C1900 and is tile hung in the Arts and Crafts style, and No. 12 dates from the mid 19<sup>th</sup> century, one of the earliest houses in this part of Redhill. Both have their frontages to the south, facing away from the application site, and are separated from it by later housing, minimising the impact of the proposed development on them. As they form part of the Redstone Hill Conservation Area, this impact is addressed in more detail below in the context of the wider area.
206. As set out in the HA, the site is located 65m north of the Redstone Hill Conservation Area, which comprises a number of residential roads on rising land leading off Redstone Hill, primarily to its eastern side. The Conservation Area is described in the Redstone Hill Conservation Area Appraisal (December 2013) as being a '*cohesive grouping of Arts and Craft houses by the Architect Albert Venner, complimented by a number of prominent buildings such as the Lakers Hotel and a rising topography.*' Albert Venner was a local architect who lived at No. 37 Redstone Hill and was an influential figure in the development of the area. The houses were designed in the 'faux vernacular', typical of the late 19<sup>th</sup> and early 20<sup>th</sup> centuries area, from which the area derives its strong significance, and the Appraisal states that 'there is a need to ensure the cohesiveness of the Venner development is not eroded by insensitive development'.
207. The Council's HBO describes the Venner development as having good quality houses from the period defined by their use of pitched roofs, tiles, boundary walls, brick and faux timber. Key buildings identified in the Appraisal are the former Lakers Hotel, the Home Cottage PH, the Oak in Fenton Road and 12 Cavendish Road (which pre-dates the Venner-phase development of the area).

208. The setting of the Conservation Area is described by the Council's HBO as being mixed, in part dominated by views of the recent, modern development of Redhill town centre (to the west). This is particularly the case for parts of Cavendish Road, including at its junction with Redstone Hill, from which the high-rise development to the west, and the postal sorting office building, are clearly visible. However in other parts of the Conservation Area, there is little indication of the town centre, including from Crossland Road and Hillfield Road which – due to their elevated position - have distant views to the North Downs, over and beyond the application site. The view north from Crossland Road is identified in the Appraisal as a key view.
209. The Council's HBO raises no objection to the demolition of the existing buildings on site, or its redevelopment at scale to provide extra care housing. However, he identifies some harm due to the height of the building, the proposed flat roof (in contrast to traditional flat roofs), and the loss of views of the surrounding hills. He advises that the impact of the building would be particularly evident from views down Crossland Road (decreasing towards its northern end), and also through gaps along Cavendish Road. Existing tree cover and other buildings would limit views to the top storey, lift towers and plant, and as such the building would not be 'omnipresent', however he considers that there would be an intrusion into this 'significant Victorian and Edwardian sanctuary' from modern day Redhill.
210. These comments are noted, and it is recognised (as set out previously in this report) that the proposed building would be of significantly different scale to that currently on site and therefore with the potential to be more visible from the Conservation Area to the south. However, as shown in a series of indicative views submitted as part of the Heritage Assessment, views of the site would be relatively limited due to existing buildings and topography. Views are further screened by tree cover (including evergreen varieties), although it is acknowledged that tree cover should not be relied on in the longer term to screen development.
211. In terms of views from Cavendish Road, it is considered that the virtually continuous line of development to its north side largely precludes views apart from very sporadically. It is noted on this point that the development of Venner Close (partially in a backland location behind the frontage development on Cavendish Road) post-dates the designation of the Conservation Area and its Appraisal. This group of buildings has impacted significantly on the previously open nature of this land between the application site and the Conservation Area, limiting intervisibility and further divorcing the two areas in a visual sense.



212. In terms of more distant views from the higher part of Cavendish Road, it is recognised that upper sections of the building are likely to be visible from certain vantage points. However, these would again be glimpsed between buildings and seen against views of the wider landscape north of the town (to the North Downs), which would be unaffected by development on low-lying land in its foreground. This view includes Gatton Hall (Grade II) and its parkland (Gatton Park – Grade II). Furthermore, as set out previously, the four storey residential blocks comprising the St Annes development – which are located on higher ground above the application site – are highly visible in views from this direction and it is in this context that the proposed development would be viewed. Comments relating to the flat roofed design of the proposed building (which would be in contrast with the St Annes development) are noted, however as has been set out previously, flat roofed development forms part of the character of the area, including within the town centre and the postal sorting office.
213. The Council's historic buildings officer concludes that the development would result in a low level of substantial harm to the Redstone Hill Conservation Area (a designated heritage asset). The NPPF requires that great weight is given to any harm to such assets, and states in paragraph 208 that where a development proposal leads to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. The Council's HBO advises that in this case, he considers the provision of extra care housing to weigh in favour of the scheme as it will significantly benefit the community and it is not considered that the harm to the conservation area is sufficient to justify refusal. It is further noted that no specific objection has been raised in this regard by Reigate and Banstead's Conservation Officer.
214. In line with the policy requirement set out in RBDMP Policy NHE8, an Archaeological Desk Based Assessment has been carried out. Further field evaluation was then undertaken, with five trial trenches excavated in the northern part of the site. This revealed a small assemblage of unstratified worked flint, but there was no trace of any significant archaeological features. Evidence from the evaluation suggests that the area to the south may be less disturbed than first thought due to soil build up and hill wash. However, the County Council's Archaeological Officer advises that as the proposed new build in this area largely corresponds with the footprint of the current buildings, which are likely to have disturbed any archaeological features that may have been present, no further work is required in this area. On this basis, he has confirmed that no further archaeological work will be required and as the evaluation has demonstrated that significant archaeological remains will not

be impacted upon by the new development, and there is no need for any archaeological condition to be imposed on any permission.

215. Further research has been undertaken in relation to the reference made in Reigate and Banstead BC's response to the possible existence of a historic watermill in the vicinity of the site. The origin of this query is that there is a record in the Surrey History Centre showing a recently demolished watermill (postcard), described as being of The Mill House in Salfords (south of Redhill). The Reigate and Banstead BC Conservation Officer queried whether this could relate to the former pumping station which is shown on historic maps on the site adjacent to the current application site, as such sites often evolved from earlier watermills. In the absence of any evidence to support the suggestion that there was a watermill on this site, and that the site has since been redeveloped, it is concluded that there is a very low likelihood of archaeological remains being evident on the application site.

---

### **Human Rights and Equalities Implications**

216. The Human Rights Act Guidance for Interpretation, contained in the Preamble to the Agenda is expressly incorporated into this report and must be read in conjunction with the following paragraph.
217. In this case, it is the Officer's view that the scale of such impact is not considered sufficient to engage Article 6 or Article A of Protocol 1 and any impacts can be mitigated by conditions, taking into account representations made in relation to the impact of the development on their residential amenities. The proposal is not considered to interfere with any Convention rights.
218. The Council is required by section 149 of the Equality Act 2010 to have due regard to the need to eliminate conduct prohibited by the act, advance equality of opportunity and foster good relations between people with protected characteristics and people who do not. The level of "due regard" considered sufficient in any particular context depends on the facts.
219. In this instance, the Council has considered its duty under the Equality Act 2010 and has concluded that this application does not give rise to any equalities considerations.

---

### **Conclusion**

220. This is an outline application, seeking approval for layout, scale and means

of access (with appearance and landscaping reserved for future consideration).

221. The proposal accords with national and local planning policy regarding the provision of housing for boosting the supply of housing generally, and specialist housing for different groups in the community in particular. The site is allocated in the development plan for residential and community uses, which this development would deliver. It is also very well located in relation to Redhill town centre, and the services and facilities located there, with good inter-connectivity between the site and its surroundings.
222. It is recognised that part of the site is located in Flood Zones 3b and 3a, and that the proposed development (for extra care housing) is also classed as 'More Vulnerable' as defined by the NPPF. However, it is considered that it has been demonstrated that the Sequential Test and Exceptions Test have been met, this having also been assessed in light of the site's local plan allocation for residential and community use. The site is previously developed and the proposed development would through its design provide compensatory storage capacity for flood water and minimise risk from flooding for future occupiers.
223. It is also recognised that a low level of substantial harm has been identified to the Redstone Hill Conservation area (a designated heritage asset) to which great weight must be afforded in the planning balance.
224. Comments raised in representations, including those raised by Reigate and Banstead Borough Council, are acknowledged and have been afforded due weight.
225. Weighing in its favour, and attributed significant weight, the proposal would deliver up to 120 modern, extra care units on an existing, unused brownfield site in a highly sustainable location. It would also accord with the Borough's aspirations as set out in the Reigate and Banstead Core Strategy 2014 for prioritising the use of sustainably located previously developed sites and the delivery of housing for all sections of the community, including the elderly, and affordable housing. It is also considered that the redevelopment of this prominent site at one of the key approaches to the town centre would have a positive impact on the area, and re-introduce activity to the street frontage, at Noke Drive in particular. The proposal would not sterilise or otherwise compromise use of land to the north, which forms part of land allocated for residential and community use in Policy RTC4 of the RBDMP. It would also result in a positive benefit in terms of biodiversity, delivering a net gain in this regard. It is considered that the low level of significant harm to the Redstone

Hill Conservation Area is outweighed by the public benefits of the scheme, in accordance with paragraph 208 of the NPPF.

## **Recommendation**

That, subject to Regulation 3 of the Town and Country Planning Regulations 1992, outline planning consent is granted for application reference: RE24/00028/CON, subject to the following conditions:

**IMPORTANT - CONDITION NOS. 5, 9, 18, 20, 22, 26 and 28 MUST BE DISCHARGED PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT.**

## **Conditions:**

## **Commencement**

1. The development hereby permitted shall be begun either before the expiration of five years from the date of this permission, or before the expiration of two years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

## **Approved Plans**

2. The means of access, siting, layout and scale of the development hereby approved is as shown on the following approved plans/drawings:
  - Drawing Number: 5210471-ATK-XX-00-DR-A-02100 Rev P02 – Existing Location Plan dated 15 December 2023
  - Drawing Number: 5210471-ATK-XX-00-DR-A-02102 Rev P02 – Existing Site Plan dated 15 December 2023
  - Drawing Number: 5210471-ATK-XX-00-DR-A-02103 Rev P02 – Proposed Site Plan dated 15 December 2023
  - Drawing Number: 5210471-ATK-XX-00-DR-A-90111 Rev P02 – Indicative General Arrangements – Proposed Plans – Ground Floor dated 13 December 2023
  - Drawing Number: 5210471-ATK-XX-01-DR-A-90112 Rev P02 – Indicative General Arrangements – Proposed Plans – First Floor dated 13 December 2023
  - Drawing Number: 5210471-ATK-XX-02-DR-A-90113 Rev P02 – Indicative General Arrangements – Proposed Plans – Second Floor dated 13 December 2023

- Drawing Number: 5210471-ATK-XX-03-DR-A-90114 Rev P02 – Indicative General Arrangements – Proposed Plans – Third Floor dated 13 December 2023
- Drawing Number: 5210471-ATK-XX-04-DR-A-90115 Rev P02 – Indicative General Arrangements – Proposed Plans – Fourth Floor dated 13 December 2023
- Drawing Number: 5210471-ATK-XX-05-DR-A-90116 Rev P02 – Indicative General Arrangements – Proposed Plans – Fifth Floor dated 13 December 2023
- Drawing Number: 5210471-ATK-XX-06-DR-A-90117 Rev P02 – Indicative General Arrangements – Proposed Plans – Roof Plan dated 13 December 2023
- Drawing Number: 5210471-ATK-XX-XX-DR-L-00001 Rev P03 – Landscape Proving Plan dated 14 December 2023
- Drawing Number: 5210471-ATK-XX-ZZ-DR-A-02300 Rev P02 – Existing Site Section dated 13 December 2023
- Drawing Number: 5210471-ATK-XX-ZZ-DR-A-02301 Rev P02 – Indicative Proposed Site Section dated 13 December 2023
- Drawing Number: 5210471-ATK-XX-ZZ-DR-A-90200 Rev P02 – Existing Site Elevations 1 of 2 dated 13 December 2023
- Drawing Number: 5210471-ATK-XX-ZZ-DR-A-90201 Rev P02 – Existing Site Elevations 2 of 2 dated 13 December 2023
- Drawing Number: 5210471-ATK-XX-ZZ-DR-A-90202 Rev P02 – Indicative Proposed Site Elevations 1 of 2 dated 15 December 2023
- Drawing Number: 5210471-ATK-XX-ZZ-DR-A-90203 Rev P02 – Indicative Proposed Site Elevations 2 of 2 dated 15 December 2023
- Drawing Number: SCC23642-01A Rev A -Tree Survey Plan dated 27 March 2023
- Drawing Number: SCC23642-03 Rev A -Tree Protection Plan – Sheet 1 of 3 (Demolition Phase) dated 20 December 2023
- Drawing Number: SCC23642-03 Rev A – Tree Protection Plan – Sheet 2 of 3 (Construction Phase) dated 20 December 2023
- Drawing Number: SCC23642-03 Rev A – Tree Protection Plan – Sheet 3 of 3 (Combined Phase) dated 20 December 2023

### **Reserved Matters**

3. Approval of the details of the design and external appearance of the building, and the landscaping of the site (hereinafter called "the reserved matters") shall be obtained from the County Planning Authority in writing before any development is commenced and carried out as approved. Plans and particulars of the reserved matters referred to above, shall be submitted in

writing to the County Planning Authority before the expiration of three years from the date of this permission.

## **Flood Risk and Drainage**

4. The development shall be carried out in accordance with the submitted Flood Risk Assessment ref: Colebrook Day Centre Flood Risk Assessment, dated: 04/04/2024, job number: 5210471 and the following mitigation measure it details:

- Compensatory storage shall be provided of total volume of 523m<sup>3</sup> at NGR location: TQ283506

This mitigation measure shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measure detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

5. The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the County Planning Authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non-Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

a) Evidence that the proposed final solution will effectively manage the 1 in 30 (+35% allowance for climate change) & 1 in 100 (+40% allowance for climate change) storm events and 10% allowance for urban creep during all stages of the development. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to the pre-development Greenfield run-off including multifunctional sustainable drainage systems.

b) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).

c) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.

- d) Evidence that the existing drainage to be retained is fit for its purpose.
- e) Details of drainage management responsibilities and maintenance regimes for the drainage system.
- f) Details of how the drainage system will be protected during construction and how runoff (including any pollutants) from the development site will be managed before the drainage system is operational.

The development shall be implemented in accordance with the approved details.

- 6. The development hereby permitted shall not be occupied unless and until a verification report carried out by a qualified drainage engineer has been submitted to and approved in writing by the County Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.
- 7. Details of a Flood Warning and Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority prior to occupation of the building and thereafter implemented in accordance with the approved details.
- 8. The Reserved Matters shall include the detailed design of the access ramp to the main/south entrance to the building hereby permitted including details of how the ramp will be designed to reduce flood risk.

### **Highways, Traffic and Access**

- 9. Prior to the commencement of the development hereby permitted a Construction Transport Management Plan shall be submitted to and approved in writing by the County Planning Authority, to include:
  - a) Details of parking for vehicles of site personnel, operatives and visitors.
  - b) Details of loading and unloading of plant and materials.
  - c) Details of storage of plant and materials.
  - d) A programme of works (including measures for traffic management).
  - e) Details of boundary hoarding to be provided behind any visibility zones
  - f) Details of vehicle routing.
  - g) Measures to prevent the deposit of materials on the highway.



- h) Details of how 'before and after' condition surveys of the highway are to be submitted, and a commitment to fund the repair of any damage caused
- i) Details of turning for construction vehicles so that they may enter and leave the site in forward gear.

Only the approved details shall be implemented during the construction of the development hereby permitted.

- 10. During the construction phase of the development hereby permitted, no HGVs shall enter or leave the site before 08.30; between the hours of 15.00 and 16.00 or after 18.00 Monday to Friday; and before 08.00 and after 13.00 on a Saturday; nor shall the contractor to permit any HGV vehicles associated with the development at the site to wait in Nokes Drive or St Annes Drive at any time.
- 11. No part of the development shall be first occupied unless and until the proposed vehicular access to St Annes's Drive and Noke Drive as shown on Drawing Number: 5210471-ATK-XX-00-DR-A-02103 rev P02 – Proposed Site Plan dated 15 December 2023 have been constructed and provided with visibility zones in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority and thereafter the visibility zones shall be kept permanently clear of any obstruction over 1.05m high.
- 12. The development hereby permitted shall not be first occupied unless and until existing unutilised accesses from the site to Noke Drive have been permanently closed and any kerbs, verge, footway, and parking restriction markings, fully reinstated.
- 13. The development hereby permitted shall not be occupied unless and until the proposed Electric Vehicle charging points have been provided for all parking spaces, 20% of which must be fast charge sockets (current minimum requirements - 7kw Mode 3 with Type 2 connector - 230v AC 32 Amp single phase dedicated supply) in accordance with a scheme to be submitted and approved in writing by the County Planning Authority and thereafter retained and maintained.
- 14. The development hereby permitted shall not be first occupied unless and until the following facilities have been provided in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority for:
  - (a)The secure, covered parking of bicycles within the development site, including charging facilities for electric cycles
  - (b)Charging facilities for mobility scooters

(c) The provision of a car club space within the development, or other shared transport service

(d) Information to be provided to residents / staff / visitors regarding the availability of and whereabouts of local public transport and car clubs and thereafter the said approved facilities shall be provided, retained, and maintained to the satisfaction of the County Planning Authority.

15. The development hereby permitted shall not be first occupied unless and until space has been laid out within the site in accordance with the approved plans for vehicles to be parked and for vehicles to turn so that they may enter and leave the site in forward gear. Thereafter the parking and turning areas shall be retained and maintained for their designated purposes.

16. The development hereby permitted shall not be first occupied unless and until a Car Parking Management Plan, to include details of:

- (a) Allocation parking for vehicles of site personnel, residents, and visitors
- (b) The reallocation of residents parking spaces once the allocated resident no longer keeps a car
- (c) Allocation of parking bay(s) for car club space/shared transport vehicles and details of how this facility will be offered access by residents of the development and local residents
- (d) Allocation of spaces provided with electric vehicle charging facilities

has been submitted to and approved in writing by the County Planning Authority and thereafter the said approved plan shall be retained and maintained to satisfaction of the County Planning Authority.

### **Limitations**

17. The height and scale of the proposed building shall not exceed that shown on Drawing Numbers 5210471-ATK-XX-ZZ-DR-A-02301 Rev P02 – Indicative Proposed Site Section dated 13 December 2023, 5210471-ATK-XX-ZZ-DR-A-90202 Rev P02 – Indicative Proposed Site Elevations 1 of 2 dated 15 December 2023 and 5210471-ATK-XX-ZZ-DR-A-90203 Rev P02 – Indicative Proposed Site Elevations 2 of 2 dated 15 December 2023 hereby approved.

### **Dust Management**

18. Prior to the commencement of the development hereby permitted, a Dust Management Plan for the construction phase of the development shall be submitted to and approved in writing by the County Planning Authority. The development shall be implemented in accordance with the approved details.

## Construction Working Hours

19. No construction activities shall take place on the site except between the hours of 08.00 and 18.00 Mondays to Fridays and 08.00 to 13.00 Saturdays. There shall be no working on Sundays, Bank, National or Public Holidays.

## Noise

20. Prior to the commencement of the development hereby permitted a Construction Noise Management Plan (CNMP) shall be submitted to and approved in writing by the County Planning Authority (CPA), taking into account the construction working hours set out in Condition 17. The CNMP should include (but not be limited to) noise limits at noise sensitive receptors, noise impact assessments, mitigation measures, monitoring procedures and complaints procedures.
21. The Rating Level,  $L_{A,T,r}$ , of the noise emitted from all plant, equipment and machinery (including any kitchen extract etc), associated with the application site shall not exceed the existing representation background sound level at any time by more than +5dB(A) at the nearest noise sensitive receptors (residential or noise sensitive building). The assessment shall be conducted in accordance with the current version of British Standard (BS) 4142:2014:A1:2019 'Methods for rating and assessing industrial and commercial sound'

The existing representative LA90 background sound level shall be determined by measurement that shall be sufficient to characterise the environment. The representative level should be justified following guidance contained within the current version of BS 4142:2014:A1+2019 and agreed with the County Planning Authority (CPA).

22. Prior to the commencement of the development, a noise assessment shall be submitted to and approved in writing by the County Planning Authority (CPA), to show that noise levels within the proposed residential units and communal spaces achieve the following noise levels in line with BS8233.
  - There should be at least one common external amenity area which is suitable for resting and relaxation, with a noise level of 55dB(A)
  - The noise level in living rooms to not exceed 35dB(A) during the daytime
  - The noise level in bedrooms to not exceed 30dB(A) during the daytime
  - The noise level in bedrooms to not exceed 45dB(A) more than 10 times per night

If it is necessary to keep windows closed to achieve the above sound levels then an appropriate ventilation system must be installed to provide adequate ventilation, and to avoid overheating.

## **Trees**

23. No trees shall be removed except for those identified within the Arboricultural Appraisal and Impact Assessment and Method Statement Ref: SCC23642aia\_ams Rev A dated 20 December 2023.
24. The development shall proceed in accordance with the details, including tree protection fencing and construction exclusion zone, contained within the Arboricultural Appraisal and Impact Assessment and Method Statement Ref: SCC23642aia\_ams Rev A dated 20 December 2023 and Drawing Numbered SCC23642-03 Rev A -Tree Protection Plan – Sheet 1 of 3 (Demolition Phase) dated 20 December 2023, Drawing Numbered SCC23642-03 Rev A -Tree Protection Plan - Sheet 2 of 3 (Construction Phase) dated 20 December 2023 and Drawing Numbered SCC23642-03 Rev A -Tree Protection Plan - Sheet 3 of 3 dated 20 December 2023.

## **Ground Conditions**

25. The development hereby permitted shall be carried out in accordance with the recommendations set out in paragraph 6.4 of the Ground Investigation Report dated September 2023 (Report Reference: 5210471-ATK-XX-XX-RP-Y-00012).

## **Biodiversity and Habitat Management**

26. Prior to the commencement of the development hereby permitted, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the County Planning Authority. This Plan shall be prepared in accordance with the recommendations set out in the Updated Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment dated March 2022, as supplemented/updated by the Ecology Report dated 18 August 2024 and include the following:
  - Details of how retained habitats will be protected
  - Details of mitigation measures for protected species during active works
  - Details of a wildlife-sensitive lighting strategy for the proposals, including during the construction phase of the development

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

27. Within 6 months from the date of the approval of the landscaping 'Reserved Matter' application, a landscape and ecological management plan (LEMP) shall be submitted to the County Planning Authority for approval in writing and thereafter implemented in accordance with the approved details. The LEMP shall include:-

- (a) detailed planting schedules for the habitats to be created within the site
- (b) updated biodiversity net gain score based on the final landscaping and planting scheme
- (c) management recommendations for the retention, enhanced and created hedgerows
- (d) details of the body or organisation responsible for implementation of the monitoring plan
- (e) specification and locations of bird, bat and invertebrate boxes (and other biodiversity features of relevance)
- (f) detailed 30 year habitat creation and monitoring plan to ensure the delivery of biodiversity net gain on site
- (g) annual maintenance scheme for trees and hedgerows

The approved details shall be incorporated into the development prior to the first occupation of any part of the development and permanently maintained thereafter.

### **Resource Management Plan**

28. Prior to the commencement of the development hereby permitted a Resource Management Plan (RMP)/details of measures to demonstrate the following shall be submitted to and approved in writing by the County Planning Authority:
- a. That waste generated during the construction of development is limited to the minimum quantity necessary.
  - b. Opportunities for re-use and for the recycling of construction residues and waste on site are maximised.
  - c. On-site facilities to manage the waste arising during the operation of the development of an appropriate type and scale have been considered as part of the development.
  - d. Integrated storage to facilitate reuse and recycling of waste is incorporated in the development.

The development shall be implemented in accordance with the approved details.

### **Use Classes Restriction**

29. The extra care accommodation hereby permitted shall remain within Use Class C2 Residential Institutions in accordance with The Town and Country Planning (Use Classes) Order 1987, or any subsequent Order amending or replacing this Order, and shall remain as affordable housing for rent in accordance with the definition within the National Planning Policy Framework 2023 Annex 2: Glossary, or any subsequent Government guidance.

### **Reasons:**

1. To comply with Section 92(2) of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.
2. For the avoidance of doubt and in the interests of proper planning.
3. To comply with Article 5 of the Town and Country Planning (General Development Procedure) (England) Order 2015 (or any order revoking and re-enacting that Order) and Section 92(2) of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.
4. To ensure that the development is carried out such that the risk of flooding is minimised, both in relation to the site and future occupiers and through the provision of compensatory storage of flood water, satisfactory storage/disposal of surface water and measures to prevent blockages to the existing culvert, the occurrence of flooding elsewhere, in accordance with National Planning Policy Framework 2023 paragraphs 173, 175 and 180; Policy CS10 of the Reigate and Banstead Core Strategy 2014 and Policy CCF2 of the Reigate and Banstead Development Management Plan 2019.
5. Compliance with this Condition is required to ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site in accordance with National Planning Policy Framework 2023 paragraphs 173, 175 and 180; Policy CS10 of the Reigate and Banstead Core Strategy 2014 and Policy CCF2 of the Reigate and Banstead Development Management Plan 2019.

6. To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site in accordance with National Planning Policy Framework 2023 paragraphs 173, 175 and 180; Policy CS10 of the Reigate and Banstead Core Strategy 2014 and Policy CCF2 of the Reigate and Banstead Development Management Plan 2019.
7. To ensure the safety of people in the event of a flood event in accordance with National Planning Policy Framework Paragraph 173, Policy CS10 of the Reigate and Banstead Core Strategy 2014 and Policy CCF2 of the Reigate and Banstead Development Management Plan 2019.
8. To ensure that the design of this feature ensures that this route into the building is fully accessible to all users and is designed such that it does not unacceptably impede the flow of water in a flood event, in accordance with National Planning Policy Framework Paragraph 173, Policy CS10 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and CCF2 of the Reigate and Banstead Development Management Plan 2019.
9. Compliance with this Condition is required prior to the commencement of the development hereby permitted to ensure the public highway can continue to be used safely and without any unnecessary inconvenience during the construction phase of the development to ensure the development does not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework 2023 paragraphs 108, 114, 115, 116 and 194; Policy CS17 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and TAP1 of the Reigate and Banstead Development Management Plan 2019.
10. To ensure the development does not prejudice highway safety, including in association with the nearby Carrington School, nor cause inconvenience to other highway users in accordance with National Planning Policy Framework 2023 paragraphs 108, 114, 115, 116 and 194; Policy CS17 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and TAP1 of the Reigate and Banstead Development Management Plan 2019.
11. To ensure the development does not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework 2023 paragraphs 108, 114, 115, 116 and 194; Policy CS17 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and TAP1 of the Reigate and Banstead Development Management Plan 2019.
12. To ensure satisfactory completion of the development and to ensure that it does not prejudice highway safety nor cause inconvenience to other highway users in accordance with National Planning Policy Framework 2023



paragraphs 108, 114, 115, 116 and 194; Policy CS17 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and TAP1 of the Reigate and Banstead Development Management Plan 2019.

13. To comply with the terms of the application, the Surrey County Council Local Transport Plan 4, Healthy Streets for Surrey design guidance, and Surrey County Council Parking Standards by ensuring that electric vehicle charging points are available to all users at the earliest opportunity in accordance with National Planning Policy Framework 2023 paragraphs 108, 112, 114, 116 and 135; Policy CS17 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and TAP1 of the Reigate and Banstead Development Management Plan 2019.
14. To comply with the terms of the Surrey County Council Local Transport Plan 4, Healthy Streets for Surrey design guidance, and Surrey County Council Parking Standards by ensuring that safe and secure parking for sustainable transport modes, with appropriate charging facilities, is made available to all users at the earliest opportunity in accordance with National Planning Policy Framework 2023 paragraphs 108, 112, 114, 116 and 135; Policy CS17 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and TAP1 of the Reigate and Banstead Development Management Plan 2019.
15. To ensure that the development does not prejudice highway safety or cause inconvenience to other highway users, in accordance with National Planning Policy Framework 2023 paragraphs 108, 112, 114, 116 and 135; Policy CS17 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and TAP1 of the Reigate and Banstead Development Management Plan 2019.
16. To ensure that the development does not prejudice highway safety or cause inconvenience to other highway users, in accordance with National Planning Policy Framework 2023 paragraphs 108, 112, 114, 116 and 135; Policy CS17 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and TAP1 of the Reigate and Banstead Development Management Plan 2019.
17. To ensure that the scale of the development respects the character and appearance of the area within which it is located, in accordance with Policy CS10 of the Reigate and Banstead Core Strategy 2014 and Policy DES1 of the Reigate and Banstead Development Management Plan 2019.
18. Compliance with this Condition is required prior to the commencement of the development hereby permitted as the potential impact from dust arises during the construction of the development. In the interests of the residential amenity of neighbouring dwellings, suitable dust management measures need to be in

place at that time to ensure that the proposed development accords with Policies DES1 and DES8 of the Reigate and Banstead Development Management Plan 2019.

19. In the interests of the residential amenities of neighbouring dwellings, in accordance with Policies DES1 and DES8 of the Reigate and Banstead Development Management Plan 2019.
20. Compliance with this Condition is required prior to the commencement of the development hereby permitted as the potential impact from noise arises during the construction of the development. In the interests of the residential amenity of neighbouring dwellings, suitable noise management and mitigation measures need to be in place at that time to ensure that the proposed development accords with Policies DES1 and DES8 of the Reigate and Banstead Development Management Plan 2019.
21. In the interests of the residential amenities of neighbouring dwellings, in accordance with Policy DES1 of the Reigate and Banstead Development Management Plan 2019.
22. In the interests of the residential amenities of future occupiers of the development, in accordance with Policy DES1 of the Reigate and Banstead Development Management Plan 2019. The submission of these details for approval prior to commencement is required as noise mitigation measures will need to be incorporated into the design and construction of the development.
23. To safeguard existing trees and landscape features and to ensure their contribution to the character of development and the character of the local area in accordance with Policy CS2 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and NHE3 of the Reigate and Banstead Development Management Plan 2019.
24. To safeguard existing trees and landscape features and to ensure their contribution to the character of development and the character of the local area in accordance with Policy CS2 of the Reigate and Banstead Core Strategy 2014 and Policies DES1 and NHE3 of the Reigate and Banstead Development Management Plan 2019.
25. To ensure satisfactory completion of the development, in accordance with Policy DES9 of the Reigate and Banstead Development Management Plan 2019.

26. To enhance and protect habitats and biodiversity and in accordance with the National Planning Framework, Policy CS10 of the Reigate and Banstead Core Strategy 2014 and Policy NHE2 of the Reigate and Banstead Development Management Plan 2019. The submission of these details is required prior to the commencement of the development as details of the landscaping of the site are a reserved matter. The indicative landscaping information provided with the outline application has not been approved as it needs to be assessed in respect of the delivery of biodiversity requirements in connection with the development plan.
27. To enhance and protect habitats and biodiversity and in accordance with the National Planning Framework, Policy CS10 of the Reigate and Banstead Core Strategy 2014 and Policy NHE2 of the Reigate and Banstead Development Management Plan 2019.
28. To ensure the minimisation of waste and maximisation of recycling in accordance with Policy S4 of the Surrey Waste Local Plan 2020. This Condition is required prior to the commencement of the development as it relates to information required during the construction phase of the development.
29. To ensure that the proposed development remains solely for the use intended and meets the definition of affordable housing in order to contribute to the Reigate and Banstead Borough and wider Surrey affordable housing need in accordance with National Planning Policy Framework 2023 paragraphs 66 and 124; Policies CS14 and CS15 of the Reigate and Banstead Core Strategy Policies; and Policies DES6 and DES7 of the Reigate and Banstead Development Management Plan 2019.

### **Informatives:**

1. In determining this application the County Planning Authority has worked positively and proactively with the applicant by: entering into pre-application discussions; assessing the proposals against relevant Development Plan policies and the National Planning Policy Framework including its associated planning practice guidance and European Regulations, providing feedback to the applicant where appropriate. Further, the County Planning Authority has: identified all material considerations; forwarded consultation responses to the applicant; considered representations from interested parties; liaised with consultees and the applicant to resolve identified issues and determined the application within the timeframe agreed with the applicant. Issues of concern have been raised with the applicant including flood risk mitigation and ecological issues and addressed through negotiation and acceptable

amendments to the proposals. The applicant has also been given advance sight of the draft planning conditions. This approach has been in accordance with the requirements of paragraph 38 of the National Planning Policy Framework 2023.

2. Attention is drawn to the requirements of Sections 7 and 8A of the Chronically Sick and Disabled Persons Act 1970 and to the Code of Practice for Access of the Disabled to Buildings (British Standards Institution Code of Practice BS 8300:2009) or any prescribed document replacing that code.
3. This approval relates only to the provisions of the Town and Country Planning Act 1990 and must not be taken to imply or be construed as an approval under the Building Regulations 2000 or for the purposes of any other statutory provision whatsoever.
4. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (Section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or is being built. Planning consent for a development does not provide a defence against prosecution under this Act. Trees and scrub are likely to contain nesting birds between 1 March and 31 August inclusive. Trees and scrub are present on the application site and are assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity during this period and shown it is absolutely certain that nesting birds are not present.
5. The applicants are advised that badgers may be present on site. Badgers and their setts are protected under the Protection of Badgers Act 1992. It is a criminal offence to kill, injure or take badgers or to interfere with a badger sett. Should a sett be found on site during construction, work should stop immediately and Natural England should be contacted. During site preparation works, all open trenches, pits and excavations shall be covered outside working hours so that any transiting fauna that falls into the earthworks can escape.
6. The applicant's attention is drawn to the advice as set out in comments received from Thames Water dated 5 July 2024 including those regarding the proximity of the site to a strategic sewer.
7. If proposed works affect an Ordinary Watercourse, Surrey County Council as the Lead Local Flood Authority should be contacted to obtain prior written Consent. More details are available on the Council's website.

8. If proposed works result in infiltration of surface water to ground within a Source Protection Zone the Environment Agency will require proof of surface water treatment to achieve water quality standards. Sub ground structures should be designed so they do not have an adverse effect on groundwater.
9. It is the responsibility of the developer to ensure that the electricity supply is sufficient to meet future demands and that any power balancing technology is in place if required. Electric Vehicle Charging Points shall be provided in accordance with the Surrey County Council Vehicular, Cycle and Electric Vehicle Parking Guidance for New Development 2023.
10. The applicant is expected to ensure the safe operation of all construction traffic to prevent unnecessary disturbance, obstruction and inconvenience to other highway users. Care should be taken to ensure that the waiting, parking, loading and unloading of construction vehicles does not hinder the free flow of any carriageway, footway, bridleway, footpath, cycle route, right of way or private driveway or entrance. The developer is also expected to require their contractors to sign up to the 'Considerate Constructors Scheme' Code of Practice ([www.ccscheme.org.uk](http://www.ccscheme.org.uk)) and to follow this throughout the period of construction within the site, and within adjacent areas such as on the adjoining public highway and other areas of public realm.
11. It is the responsibility of the developer to provide e-bike charging points with socket timers to prevent them constantly drawing a current over night or for longer than required. Signage should be considered regarding damaged or shock impacted batteries, indicating that these should not be used/charged. The design of communal bike areas should consider fire spread and there should be detection in areas where charging takes place. With regard to an e-bike socket in a domestic dwelling, the residence should have detection, and an official e-bike charger should be used. Guidance on detection can be found in BS 5839-6 for fire detection and fire alarm systems in both new and existing domestic premises and BS 5839-1 the code of practice for designing, installing, commissioning and maintaining fire detection and alarm systems in non-domestic buildings.
12. The developer is reminded that it is an offence to allow materials to be carried from the site and deposited on the highway from uncleaned wheels or badly loaded vehicles. The Highway Authority will seek, wherever possible, to recover any expenses incurred in clearing, cleaning or repairing highway surfaces and prosecutes persistent offenders (Highways Act Sections 131, 148, 149).

13. Section 59 of the Highways Act permits the Highway Authority to charge developers for damage caused by excessive weight and movements of vehicles to and from a site. The Highway Authority will pass on the cost of any excess repairs compared to normal maintenance costs to the applicant/organisation responsible for the damage.
14. Details submitted pursuant to Condition 24 should include details of how lighting will be installed to minimize impacts to nocturnal wildlife within retained habitats with value for commuting and foraging bats. This should include any woodland and tree lines, with particular attention to the retained trees with bat suitability, in order to minimise disturbance to bats (see Table 28 of the Ecology Report dated 19 August 2024). These details should be accordance with the Institution of Lighting Engineers and Bat Conservation Trust Bats and Artificial Lighting at Night Guidance Note 08/23 2023.
15. The Reserved Matters required to be submitted pursuant to Condition 3 on this permission shall include details of all external lighting.
16. The applicant is requested when considering the finished design to give careful consideration to the siting of windows and balconies on the southern elevation of the building (fronting Noke Drive), to include the incorporation of design features such as obscure glazing to balcony screens, to ensure that maximum levels of privacy are afforded to occupiers of neighbouring properties and to future occupiers of the development.

---

**Contact Charlotte Parker**

**Tel. no. 020 8541 9897**

---

**Background papers**

The deposited application documents and plans, including those amending or clarifying the proposal, and responses to consultations and representations received, as referred to in the report and included in the application file.

For this application, the deposited application documents and plans, are available to view on our [online register](#). The representations received are publicly available to view on the district/borough planning register.

The Reigate & Banstead Borough Council planning register entry for this application can be found under application reference RE24/00028/CON.

The following were also referred to in the preparation of this report:

**Government Guidance**

[National Planning Policy Framework](#)

[Planning Practice Guidance](#)

**The Development Plan**

[Surrey Waste Local Plan 2020](#)

[Surrey Minerals Plan Core Strategy Development Plan Document \(DPD\) 2011](#)

[Surrey Minerals Plan Primary Aggregates Development Plan Document \(DPD\) 2011](#)

[Surrey Minerals Plan Site Restoration Supplementary Planning Document \(SPD\) 2011](#)

<https://www.surreycc.gov.uk/land-planning-and-development/minerals-and-waste/minerals-core-strategy-development-plan/aggregates-recycling-joint-development-plan>

[Reigate and Banstead Local Plan: Core Strategy 2014](#)

[Reigate and Banstead Local Plan: Development Management Plan 2019](#)

**Other Documents**

[Local Character and Distinctiveness Design Guide SPD 2021](#)

[Affordable Housing SPD 2020](#)

[Climate Change and Sustainable Construction SPD 2021](#)

---





This page is intentionally left blank