

Rule 6 Statement of Common Ground

Local Planning Authority Reference: **23/00572/F**

Local Planning Authority Appeal Reference: 23/00572/F/AP

Appeal Reference: APP/L3625/W/25/3364217

Date of Inquiry: 02/09/2025

Site: **Redhill Railway Station, Princess Way, Redhill,
Surrey, RH1 1RB**

Parties Entering into Statement of Common Ground:

Solum Regeneration (Redhill) LLP

Redhill Residents Action Group

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- Appendix 1 Site Location Plan
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1 Introduction

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Solum Regeneration (Redhill) LLP (herein the Appellant) and the Redhill Residents Action Group (herein the RRAG) to accompany the Appeal with reference APP/L3625/W/25/3364217 against the Council's refusal of planning permission for the redevelopment of Redhill Station Site A and Site B, Princess Way (herein the Site).
- 1.2 The document is agreed as of today's date but will continue to be reviewed and updated as discussions progress during the course of the Appeal. An agreed, signed version will be provided in advance of the Appeal inquiry.
- 1.3 The Planning Application subject to this appeal was submitted (by Daniel Watney LLP on behalf of the Appellant) to and validated by Reigate and Banstead Borough Council (herein the Council) on 21 April 2023 and was allocated the reference number 23/OO572/F (as amended) (the Appeal Scheme).
- 1.4 The agreed description of development is as follows:
- “Phased redevelopment of Site A comprising up to 255 residential dwellings (Class C3 use) in two buildings ranging from 10–15 storeys and 7–14 storeys, associated car parking; cycle parking; flexible Class E uses at ground floor, partial demolition, refurbishment and extension to the existing Site A station entrance building with concourse. Demolition of vacant buildings associated with station on Site B. Replacement surface station car and cycle parking and taxidrop off on Site B with a refurbished and extended Site B station entrance. Together with new public realm, hard and soft landscaping improvements, new access and servicing arrangements, plant, substation and associated works across Site A and Site B.”*
- 1.5 The purpose of this Statement is to set out the agreed factual information and areas of agreement and disagreement relating to the following matters:
- 1.5.1 Description of the Site and its surroundings;
 - 1.5.2 Planning history, including pre-application discussions;
 - 1.5.3 Planning Application and Decision (the refusal subject to this Appeal);
 - 1.5.4 Appeal Plans and Documents;
 - 1.5.5 Planning Policy Framework and material considerations;
 - 1.5.6 Areas of Agreement;
 - 1.5.7 Planning Obligations and Conditions;
 - 1.5.8 Areas of Disagreement;
 - 1.5.9 Third Party Representations; and
 - 1.5.10 Core Documents
- 1.6 This SoCG has been prepared in accordance with the advice contained in the Planning Inspectorate "Procedural Guidance – Planning Appeals – England" most recently updated in September 2024.
- 1.7 The contents of this document are considered to be 'common ground' between the Appellant and the RRAG.
- 1.8 The below synopsis of the proposed development subject to this planning Appeal is common ground.

2 Site Description

- 2.1 The appeal site comprises two adjacent land parcels, bisected by the railway, located in the centre of the settlement of Redhill.
- 2.2 Site A is located to the north and west of the railway station and contains the main station entrance and surface level station car parking. It is situated across from the Redhill Bus Station and adjacent the station's roundabout. Site A extends north along Princess Way. The entirety of Site A's eastern boundary is bound by the railway line.
- 2.3 Site B is located to the south and east of the railway tracks, onto Redstone Hill, and comprises further station surface level car parking, cycle storage, and other infrastructure that supports the station function. Site B also contains a second, single-storey entrance to the station.
- 2.4 The entirety of Site A is located within the designated Redhill Town Centre with the southern portion consisting of the main station entrance building located in the Primary Shopping Area and the existing retail provision (associated with the station) being designated as part of the Secondary Shopping Frontage.
- 2.5 The site is not located within a Conservation Area and does not contain any statutorily listed buildings, however it is noted that several heritage-related policy designations are adopted in the surrounding area. A Local Listing for the 'Central Platform at Redhill Station (M. 19c. 16 Cast Iron Columns) (m.19c) is acknowledged to be located within the boundary of Site A. The Redhill Town Centre Conservation Area is located to the west of Site A along Station Road. Site B is located outside but adjacent to the Redstone Hill Conservation Area to the south east. This Conservation Area contains the locally listed "Laker's Hotel" (m.19c), occupied by Toby Carvery located adjacent to the Site B boundary on Redstone Hill and the Venner Estate, a collection of Arts and Crafts houses designed by the architect, Albert Venner. A plan containing the agreed heritage designations proximate to the appeal site is attached at Appendix 3. Other conservation areas within the area include the Linkfield Street conservation area to the south, the Warwick Road conservation area to the west and the Gatton conservation area to the north west.
- 2.6 The character of the two sites differ, with Site A more commercial given its location within the Redhill Town Centre designated area, directly opposite the Redhill Bus Station and includes the drop-off area, taxi rank and car park running up to Ladbroke Road. The Southern part of Site A sits adjacent to a number of recently completed residential and residentially led mixed use developments. Site B is suburban in character with the principal use of the surrounding area being residential, characterised by residential streets, detached and semi-detached properties.
- 2.7 The existing heights in the area surrounding Site B are 1 – 4 storeys owing to the suburban character. However, the existing heights in the area around Site A are between 2 – 13 storeys.
- 2.8 The Site contains Redhill Railway Station which operates national railway services with approximately 15 trains per hour. Redhill Station has direct connections to Reading, Guildford, London Victoria, London Bridge, St Pancras, Luton, Bedford, Peterborough, Tonbridge, Horsham, and Gatwick Airport.
- 2.9 Site A and Site B both contain car parks, which are accessed from Princess Way for 253 car parking spaces and Redstone Hill for 136 car parking spaces respectively. The site is approximately 100m from Redhill High Street and approximately 20m from Redhill Bus Station.
- 2.10 The site is highly accessible and is one of the most sustainable locations in the borough in terms of its function as a station with high public transport accessibility and access to local amenities.

3 Planning History

ORIGINAL PERMISSION FOR REDEVELOPMENT OF THE SITE (LPA REF. 13/00848/F)

- 3.1 Prior to commencement of the project to redevelop Redhill Station Site A and Site B in 2021, the site had previously received planning approval on the 9 January 2014, LPA Ref. 13/00848/F for the following development:
- “Redevelopment of the existing station buildings and car parks to provide a new station concourse, new A1 foodstore; retail parking spaces; 150 residential units arranged in two apartment blocks; residents parking spaces; flexible use class A1, A2 , A3 floorspace; plant space; a combined heat and power plant; green roofs; sustainable transport facilities to include a taxi rank; kiss and ride and new multi-storey car park to provide commuter car parking; delivery and servicing spaces; cycle spaces for commuters and residents; provision of a new station plaza and off site highway works. As amended by letter dated 17 September”*
- 3.2 The scheme related to proposals for 150 units across 3 to 11 storey blocks on Site A with a new supermarket, whilst Site B was proposed for a five-floor multistorey car park and relocated taxi rank. Officers considered that the proposal accorded with the height and scale aspirations of the draft Redhill Town Centre Area Action Plan (AAP) (2012), locating the tallest part of the development adjacent to the station and drawing attention to the station as a landmark building, introducing a gateway to the town, and was not considered harmful to distant views as confirmed in the Council's Committee Report.
- 3.3 Permission was formally granted on 9 January 2014 following completion of a Section 106 agreement which included contributions towards highway and transport improvements and a contribution towards off-site affordable housing provision based on a claw-back mechanism. The scheme was approved without any contribution to affordable housing because it was demonstrated to be unviable and in light of the significant benefits of the scheme.
- 3.4 Following permission being granted, multiple conditions were discharged however due to a change in priorities for the anchor retail tenant, the permission was never implemented. As such, as of 9 January 2017 the permission is expired.
- 3.5 Since the 2013 permission was consented, a number of permissions have been granted and completed in the surrounding area of a similar height to that consented, such that the character of the area adjacent to Site A is different to the site context when the previous scheme was granted over 10 years ago.

4 The Planning Application and Decision

APPLICATION SUBMISSION AND DETERMINATION

- 4.1 The Application was submitted 16 March 2023 and sought planning permission for the following:
- “Phased redevelopment of Site A comprising up to 280 residential dwellings (Class C3 use) in two buildings ranging from 10–19 storeys and 7–14 storeys, associated car parking; cycle parking; flexible Class E uses at ground floor, partial demolition, refurbishment and extension to the existing Site A station entrance building with concourse. Demolition of vacant buildings associated with the station on Site B. Replacement surface station car and cycle parking and taxi-drop off on Site B with a second new station building (Sui Generis use), refurbished and extended Site B station entrance. Together with new public realm, hard and soft landscaping improvements, new access and servicing arrangements, plant, substation and associated works across Site A and Site B.”*
- 4.2 The application was made following pre-application discussions with the Council.
- 4.3 Over the course of the Application consultation period, statutory, non-statutory and third-party comments were received. Following review, the Application was amended, bringing the height down to 15 storeys at its tallest point with the following description of development agreed on 12 February 2024:
- “Phased redevelopment of Site A comprising up to 255 residential dwellings (Class C3 use) in two buildings ranging from 10–15 storeys and 7–14 storeys, associated car parking; cycle parking; flexible Class E uses at ground floor, partial demolition, refurbishment and extension to the existing Site A station entrance building with concourse. Demolition of vacant buildings associated with station on Site B. Replacement surface station car and cycle parking and taxi-drop off on Site B with a refurbished and extended Site B station entrance. Together with new public realm, hard and soft landscaping improvements, new access and servicing arrangements, plant, substation and associated works across Site A and Site B.”*

CONSULTATION RESPONSES

PUBLIC CONSULTATION RESPONSES

- 4.4 The public were consulted on the Application twice, once upon submission of the original application and then again following amendments to reduce the maximum height and other design changes in February 2024. Of the 2,043 third party representations received by the Council from members of the public and interested parties, 82 were in support and 11 neither objected nor supported the Application. Some third-party representations do not appear to have been received.

TECHNICAL CONSULTATION RESPONSES

- 4.5 Consultee responses were received from the following parties relating to the Appeal Scheme as amended February 2024:

- 4.5.1 Active Travel England – No objection
- 4.5.2 Biggin Hill Airport – No Objection
- 4.5.3 East Redhill Residents' Association – Objection
- 4.5.4 East Surrey Transport Committee – Objection
- 4.5.5 Environment Agency – No Objection
- 4.5.6 Gatwick Airport – No Objection
- 4.5.7 Health and Safety Executives – No Objection
- 4.5.8 Heathrow Airport – No Objection
- 4.5.9 Metrobus – Neither Objecting or Supporting
- 4.5.10 National Air Traffic Service Safeguarding – No Objection
- 4.5.11 Natural England – No Objection
- 4.5.12 Network Rail – Support
- 4.5.13 Ramblers Association (Reigate) – No Objection
- 4.5.14 Regulatory Support Services – No Objection
- 4.5.15 Reigate and Banstead Borough Council Environmental Health Air Quality – No Objection
- 4.5.16 Reigate and Banstead Borough Council Environmental Health Contaminated Land – No Objection
- 4.5.17 Reigate and Banstead Borough Council's Conservation Officer – The officer identified less than substantial harm being caused to heritage assets but concluded no objection.
- 4.5.18 Reigate and Banstead Borough Council's Tree Officer – No Objection
- 4.5.19 Reigate Redhill and District Rail Users Association – Objection
- 4.5.20 Salford and Sidlow Parish Council – Objection
- 4.5.21 Surrey County Council Archaeology – No Objection
- 4.5.22 Surrey County Council CIL – No Objection
- 4.5.23 Surrey County Council Highways – No objection.
- 4.5.24 Surrey County Council Local Lead Flood Authority – No Objection
- 4.5.25 Surrey County Council Minerals and Waste – No Objection
- 4.5.26 Surrey Fire and Rescue Authority – No Objection
- 4.5.27 Surrey Hills National Landscape Planning Advisor – No Objection
- 4.5.28 Surrey Police – No Objection
- 4.5.29 Surrey Wildlife Trust – No Objection
- 4.5.30 Thames Water – No Objection
- 4.5.31 The Reigate and Redhill Civic Society – Objection
- 4.5.32 UK Power Network – No Comments Received

DETERMINATION

- 4.6 The Planning Application was presented at planning committee on the 23 October 2024 with the Officer's Report and supplementary addendum recommending approval subject to completion of a Section 106 Agreement.

4.7 Following the Officer's presentation at planning committee and discussion between members / councillors the below reason for refusal was recommended which Councillors voted 11-2 in favour of refusal (2 abstentions):

"The proposed development, by virtue of its height, scale, design and layout, would fail to make a positive contribution to the character and appearance of the area and cause less than substantial harm to the Redstone Hill and Redhill Town Centre Conservation Areas, which are designated heritage assets. The public benefits of the scheme, in the absence of affordable housing provision, are not considered to outweigh this harm and therefore the proposal would be contrary to Policies DES1 and NHE9 of the Development Management Plan 2019 (reviewed 2024) and the provisions of the National Planning Policy Framework 2023."

4.8 The Decision Notice was issued and dated 24 October 2024.

5 Appeal Plans and Documents

- 5.1 It is common ground that the plans and documents listed at Appendix 2 are those which supported the planning Application and are now subject to approval under this Appeal.
- 5.2 It is common ground that where documents were revised and superseded through the course of the Application, the original documents which no longer apply and did not form part of the Council's decision are not referred to in the list of documents for the Inspector's approval.
- 5.3 Since the Application was refused in October 2024, new Building Standard BS 9991 was published in November 2024. BS 9991:2024 covers fire safety in the design, management and use of residential buildings. It is therefore relevant to the Appeal Scheme.
- 5.4 Agreed at the Case Management Conference on the 27 June 2025, the Inspector is willing to consider the required amended plans as part of this appeal and is yet to confirm whether they can be substituted as part of the Inquiry.
- 5.5 The Inspector shared the amended plans with the Council and the RRAG in June 2025 to comment whether the amendments required re-consultation.
- 5.6 The Council responded to the updated plans to confirm that they did not consider the plans to require re-consultation.
- 5.7 The RRAG provided their feedback on the 4th July 2025 along with several queries. These were answered by the Appellant.

6 Planning Policy Framework

- 6.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 It is common ground that the Development Plan for the Council currently comprises:
- 6.2.1 The Core Strategy (adopted 2014 and reviewed 2019 and 2024);
 - 6.2.2 The Development Management Plan (adopted 2019, reviewed 2024);
 - 6.2.3 The Policies Map;
 - 6.2.4 The Surrey Minerals Plan Core Strategy (adopted 2011);
 - 6.2.5 The Primary Aggregates Development Plan Document (adopted 2011);
 - 6.2.6 The Aggregates Recycling Joint Development Plan Document (adopted 2013); and
 - 6.2.7 The Surrey Waste Plan (adopted 2020).
- 6.3 A material consideration in the determination of this Appeal is the National Planning Policy Framework which was published in December 2024.
- 6.4 Other relevant policy and guidance documents include the National Planning Practice Guidance, and various SPDs and SPGs adopted by the Council.
- 6.5 The applicable Development Plan Policies and guidance are set out below and are agreed between both parties and may be referred to in evidence submitted by the Appellant and the RRAG.

REIGATE AND BANSTEAD ADOPTED DEVELOPMENT PLAN

REIGATE AND BANSTEAD LOCAL PLAN: CORE STRATEGY (ADOPTED 2014, REVIEWED 2019 AND 2024)

- 6.5.1 CS1 'Sustainable Development'
- 6.5.2 CS2 'Value Landscape and the Natural Environment'
- 6.5.3 CS4 'Valued Townscapes and Historic Environment'
- 6.5.4 CS5 'Valued People/Economic Development'
- 6.5.5 CS6 'Allocation of Land for Development'
- 6.5.6 CS7 'Town and Local Centres'
- 6.5.7 CS8 'Area 2a: Redhill'
- 6.5.8 CS10 'Sustainable Development'
- 6.5.9 CS11 'Sustainable Construction'
- 6.5.10 CS12 'Infrastructure Delivery'
- 6.5.11 CS13 'Housing Delivery'
- 6.5.12 CS14 'Housing Needs'
- 6.5.13 CS15 'Affordable Housing'
- 6.5.14 CS17 'Travel Options and Accessibility'

REIGATE AND BANSTEAD DEVELOPMENT MANAGEMENT PLAN (ADOPTED 2019, REVIEWED SEPTEMBER 2024)

- 6.5.15 EMP5 'Local Skills and Training Opportunities'
- 6.5.16 RET1 'Development with Identified Retail Frontages and Local Centres'
- 6.5.17 RET2 'Town Centre Frontages' (Policy no longer considered up to date)
- 6.5.18 DES1 'Design of New Development'
- 6.5.19 DES4 'Housing Mix'
- 6.5.20 DES5 'Delivering High Quality Homes'
- 6.5.21 DES6 'Affordable Housing'
- 6.5.22 DES7 'Specialist Accommodation'
- 6.5.23 DES8 'Construction Management'
- 6.5.24 DES9 'Pollution and Contamination Land'
- 6.5.25 OSR2 'Open Space in New Development'
- 6.5.26 TAP1 'Access, Parking and Servicing'
- 6.5.27 CCF1 'Climate Change Mitigation'
- 6.5.28 CCF2 'Flood Risk'
- 6.5.29 NHE1 'Landscape Protection'
- 6.5.30 NHE2 'Protecting and Enhancing Biodiversity'
- 6.5.31 NHE3 'Protecting Trees, Woodland Areas and Natural Habitats'
- 6.5.32 NHE9 'Heritage Assets'
- 6.5.33 INF1 'Infrastructure'
- 6.5.34 INF3 'Electronic Communication Networks'

MATERIAL CONSIDERATIONS

NATIONAL PLANNING POLICY FRAMEWORK (UPDATED DECEMBER 2024)

RELEVANT LOCAL SUPPLEMENTARY PLANNING GUIDANCE AND DOCUMENTS

- 6.5.35 Local Character and Distinctive Design Guide SPD 2021
- 6.5.36 Climate Change and Sustainable Construction SPD 2021
- 6.5.37 Affordable Housing SPD 2020
- 6.5.38 A23 Great Street Design Code SPD 2024

OTHER

- 6.5.39 Healthy Streets for Surrey Design Code (2023)
- 6.5.40 Reigate and Banstead Borough Council Redhill Town Centre Area Action Plan (did not progress beyond 2012 draft)
- 6.5.41 Reigate and Banstead Borough Council Making Space for Waste (Adopted 2024)
- 6.5.42 Reigate and Banstead Local Cycling and Walking Infrastructure Plan (reviewed February 2023)
- 6.5.43 Surrey County Council Vehicle Cycle and Electronic Vehicle Parking Guidance for New Development (Updated 2024)
- 6.5.44 Surrey Local Transport Plan 2022–2032 (LTP4), (reviewed October 2024)
- 6.5.45 Redhill Conservation Area Character Appraisals (Draft, February 2015)
- 6.5.46 Redstone Hill Conservation Area Character Appraisals (Draft, December 2013)
- 6.5.47 Proposed Gatton Park Conservation Area (Proposed June 2025)
- 6.5.48 Historic England Good Practice Advice Note 3: The Setting of Heritage Assets (Second Edition; December 2017)
- 6.5.49 Landscape Institute and Institute of Environmental Management and Assessment: Guidelines for Landscape and Visual Impact Assessment (3rd Edition) (GLVIA)
- 6.5.50 Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2022)

7 Areas of Agreement

7.1 The following matters are agreed between the RRAG and the Appellant:

PRINCIPLE OF MIXED-USE RESIDENTIAL-LED DEVELOPMENT

7.2 The Site is located on sustainable, brownfield land located within an urban area and a settlement boundary and as such there is a presumption in favour of development under Paragraph 125(c) and 125(d) of the NPPF but only if there is an identified housing need and substantial harm would not be caused. The Appeal Scheme also accords with Core Strategy Policies CS6 and CS8 in respect of the delivery of housing.

HEIGHT AND SCALE

7.3 There is no adopted policy within the Council's Development Plan which stipulates a maximum height for buildings within Redhill. Any assessment is based on available guidance documents or national policy and the context of the site and any relevant planning history.

7.4 The appeal site is located within a lower part of Redhill within the river valley and adjacent the railway embankment. There are some taller buildings within Redhill Town Centre, including one at 13 storeys in height.

HOUSING MIX

7.5 The Appeal Scheme proposes a mix of studios and 1-bed apartments alongside 2-bed and 3-bed apartments.

AFFORDABLE HOUSING

7.6 The Appellant state that the Appeal Scheme is unable to deliver any affordable housing on-site nor as an off-site contribution.

7.7 A detailed viability appraisal prepared by U.L.L Property accompanied the Appeal Scheme, which was considered by the Council's independent assessors, Aspinall Verdi.

7.8 Aspinall Verdi's initial independent assessment concluded that the original scheme was unable to deliver affordable housing. The viability of the Appeal Scheme being unable to deliver any affordable housing is reconfirmed in the updated Viability Appraisal prepared by U.L.L Property which accompanies the Application amendments submission in February 2024.

7.9 The viability position of the Appellant is that the Scheme is providing public benefits including improvements to the railway station. The viability position is agreed by the Council and they consider it is in accordance with local policies DES4, DES6, the Core Strategy and the Affordable Housing SPD.

NON-RESIDENTIAL FLOORSPACE

7.10 The Appeal Scheme will result in an uplift of Class E floorspace from 48 sq/m to 301 sq/m within the town centre boundary. The existing retail floorspace is fully occupied. The proposed Class E space will be a flexible use of high quality floorspace to encourage investors to support Redhill Town Centre in accordance with Policy RET5 and Policy CS8.

STANDARD OF ACCOMMODATION

- 7.11 All residential units meet Nationally Described Space Standards and are designed to meet M4(2) requirements as a minimum and therefore exceed the 20% required by Policy DES7. 15 units of the Scheme would meet M4(3) requirements which is 6% of properties. This exceeds the 4% requirement under Policy DES7.

RESIDENTIAL AMENITY

- 7.12 The Appeal Scheme provides amenity space for future residents with 93% of units having access to their own private balcony. Properties without private amenity space can access one of two communal roof gardens (one for each block).

HERITAGE IMPACT

- 7.13 The Appeal Scheme is supported by a detailed Heritage, Townscape, Visual Impact Assessment.

CAR AND CYCLE PARKING

- 7.14 The Appeal Scheme reduces the total amount of parking spaces on site from 389 commuter spaces to 350 commuter spaces and provides 27 parking spaces for the residential element. The County Highways Officer found that the scheme was acceptable with the proposed agreed mitigation.
- 7.15 The changes in the level of commuter parking spaces is set out by the Appeal Scheme. Due to the location of the Appeal Scheme, the site achieves the highest accessibility level under the criteria of Annex 4 of the adopted DMP.
- 7.16 The Appeal Scheme is designed as a low parking development given the sustainable location with only 10% of dwellings being provided a parking space and is aligned to the locally adopted car parking standards at Annex 4 of the local DMP.
- 7.17 The Scheme sets out a plan to deliver 248 cycle parking spaces across the two sites for rail users, which would increase existing cycle parking provision on site by 20%. Following early pre-application engagement and continued discussions throughout the application determination period, Active Travel England and Surrey County Council as the Highways Authority eventually raised no objection to the Application subject to conditions and financial obligations being secured which is accepted by the Appellant.

ACCESS AND HIGHWAYS

- 7.18 The proposed access and highways strategy is in accordance with Policy TAP1 and NPPF Paragraph 115 and is agreed by both Active Travel England and the Surrey County Council Highways, who after initial concerns and further discussion with the Appellant raised no objection to the proposals subject to conditions and financial obligations which the Appellant accepts.

AIR QUALITY

- 7.19 The Application was accompanied by an Air Quality Report which concluded there will be no significant impacts to the occupants and users of the site from air pollution in accordance with Policy DES9. The Council's Air Quality Officer raised no objection with these findings subject to conditions to secure effective water suppression and management during demolition and construction works.

OVERHEATING

- 7.20 An Overheating Assessment accompanied the Application which confirms that neither residential dwellings, non-domestic areas, nor communal corridors are at risk of overheating.

ENERGY AND SUSTAINABILITY

- 7.21 The Appeal Scheme is supported by an Energy Statement, Sustainability Statement, BREEAM Pre-Assessment, and Sustainability Measures Report. These reports confirm that the Appeal Scheme will exceed the requirements stipulated within the Development Plan Policy CCF1 and SPD guidance. The Appeal Scheme will achieve BREEAM 'Very Good' standards, with the residential units meeting water efficiency measures and a 62.4% carbon saving.

LANDSCAPING AND TREES

- 7.22 The Surrey Wildlife Trust has reviewed the methodology and findings of the report confirming that subject to conditions to secure strategies they have no objection to the proposal.
- 7.23 The Council's Tree Officer does not object to the proposal, subject to conditions to finalise species, method of tree planning and updates to the Landscape Management Plan being placed. The proposed landscaping scheme and approach to trees on site is acceptable in accordance with Policies NHE3 and NPPF Paragraph 136

AMENITIES OF NEIGHBOURING AND FUTURE RESIDENTS

- 7.24 Within the accompanying Daylight and Sunlight Assessment the proposed development was considered by the Appellant to have no impact on properties to the north nor east of the site. It is agreed that the proposal would not result in an adverse impact in terms of being overbearing or from a loss of privacy in accordance with Policy DES1.

SAFETY AND SECURITY

- 7.25 The Appeal Scheme was designed to enhance safety and security and mitigate the potential of crime in accordance with Policy DES1. The Appellant engaged with the Designing Out Crime Officer of the Surrey Police during the Application. It is agreed that there are no safety or security concerns with the Scheme, subject to a recommended condition to ensure the Scheme meets Secured by Design Standards which is accepted by the Appellant.

FIRE SAFETY

- 7.26 A Fire Safety Strategy and Gateway 1 Fire Statement were submitted with the Application. HSE and Surrey Fire and Rescue Authority raised no objection. There are no issues regarding fire safety for the planning stage and further assessment will be undertaken as required at the building control stage. This is subject to the point made in Section 6 of the Appellant's Statement of Case regarding BS 9991:2024.

BIODIVERSITY

- 7.27 The Scheme is not subject to a mandatory 10% biodiversity net gain, due to the Planning Application being submitted March 2023 prior to the national requirement being introduced, however a Biodiversity Net Gain Assessment was submitted with the amended Application which stated that the Scheme can deliver a net gain of 7.15% for habitats and 82.71% for hedgerows, in line with Policy NHE2, under DEFRA's Statutory Biodiversity Metric methodology.
- 7.28 SWT are satisfied with the information submitted and raised no objection to the Application subject to conditions relating to ecology and biodiversity which is accepted by the Appellant.

FLOOD RISK AND DRAINAGE

- 7.29 Site A is partially located within Flood Zone 2, and a small part is within Flood Zone 3a. Site A is also at risk of surface water flooding. Site B is within Flood Zone 1 and not found to be at risk of surface water flooding.
- 7.30 The Scheme is supported by a Flood Risk Assessment, which was assessed by the Environment Agency and the Surrey County Council Sustainable Drainage team as the Local Lead Flood Authority. At application stage, the Appellant responded to queries raised by the Environment Agency and they raised no objection to the Application. The LLFA are satisfied that the proposed drainage scheme meets the requirements set out in the NPPF and PPG and are content with the development proposed, subject to conditions being attached to confirm the finalised detailed drainage scheme and a verification report which is accepted by the Appellant.

ARCHAEOLOGY

- 7.31 The Scheme is supported by an Archaeological Desk Based Assessment. Surrey County Council Archaeology raised no objection to the Application subject to a condition to secure a Written Scheme of Investigation for the site archaeological matters which is accepted by the Appellant. The Scheme is in accordance with Policy NHE9.

GROUND CONDITIONS AND CONTAMINATION

- 7.32 The submitted Geo-Environmental Assessment was reviewed by the Council's Contaminated Land Officer who confirmed the Scheme is in accordance with Policy DES9, subject to full a set of ground contamination conditions being adhered to.

RETAIL PROVISION

- 7.33 The Appeal Scheme would result in a uplift of available Class E floorspace from 48 sq/m to 301 sq/m within the town centre boundary. Therefore, there would no loss of Class E space and no development of town centre uses would take place outside of the defined town centre in accordance with Policies RET1 and RET5.

8 Planning Obligations and Conditions

DRAFT PLANNING OBLIGATIONS

- 8.1 RRAG understands that the Appellant and the Council are working together to progress draft planning obligations and conditions and will include the following heads of terms:
- 8.1.1 Legal Professional Costs Recovery – Paying the Council’s legal and professional costs of preparing the Agreement and any other enabling arrangements;
 - 8.1.2 Bus Station Improvement Contribution – Contribution of £9,000 toward real time passenger information at the Redhill Bus Station;
 - 8.1.3 Parking Monitoring Contribution – Contribution of £3,000 index linked towards auditing and review of on street parking monitoring report and review of parking restrictions and on street parking;
 - 8.1.4 Travel Plan Auditing Contribution – Contribution of £4,600 index linked towards the auditing and monitoring of the travel plan for a period up to 7 years; and
 - 8.1.5 Affordable Housing Claw-Back Mechanism – Agreement to undergo early and late-stage review of the viability of the Scheme to confirm whether a contribution towards off-site affordable housing provision can be secured following the review finding a favourable uplift in viability.

DRAFT CONDITIONS

- 8.2 RRAG notes that the Council has recommended conditions within the Officer’s Report and Planning Committee Meeting Addendum dated 23 October 2024. The Appellant is willing to utilise the wording of these draft conditions as a starting point of discussions with the wording to be agreed as necessary should be planning permission be granted on appeal. RRAG understand that the Council and the Appellant are open to further discussions about conditions during the Inquiry.

9 Areas of Disagreement

- 9.1 The following matters are in disagreement between the Appellant and RRAG:
- 9.1.1 Whether the proposal is in keeping with and makes a positive contribution to, the townscape and landscape character by way of its height, scale, design and layout. The Appellant considers that in accordance with the Council's adopted policy and guidance, the scheme reflects the surrounding context in which it is set and does not negatively impact the character and appearance of the area. Further, the Appellant considers that the draft Redhill Town Centre Area Action Plan (drafted 2012) forms a material consideration in determination of the Appeal Scheme as confirmed in the Council's committee report. RRAG's position is that the scheme is excessive in scale and out of keeping with the area, such that it negatively impacts upon the townscape and wider landscape setting of Redhill.
 - 9.1.2 The heritage assets affected by the proposal, and the degree of harm resulting to these assets. The Appellant considers that the Appeal Scheme will have no harmful impacts in terms of surrounding heritage assets. RRAG's position is that the appeal scheme has a negative impact upon the setting of five conservation areas (Redhill Town Centre, Redstone Hill, Linkfield Street, Warwick Road and Gatton) and three statutorily listed assets (Gatton Hall, Lower Gatton Park and Baptist Chapel Station Road). Combined the harm caused to the heritage assets is considered by RRAG to be at the upper end of less than substantial.
 - 9.1.3 Whether the proposal meets the identified mix of residential units required in the Borough. The Appellant considers the scheme to optimise the density of development in a sustainable town centre location and deliver an appropriate residential mix for its location and as a flatted development. The Appeal Scheme is accompanied by an open-book viability assessment which confirms it is unable to deliver affordable housing in accordance with the Council's Affordable Housing SPD (2020). The RRAG contend that the accommodation is skewed towards the small units and only provides market units, omitting provision to meet the requirements of the whole community in line with policy.
 - 9.1.4 Whether the proposal accords with the sunlight and daylight requirements. The Appellant, as demonstrated by accompanying Daylight and Sunlight Assessment, states that the proposed development will have no impact on properties to the north nor east of the site. Where the scheme would result in any daylight or sunlight reductions to surrounding residential properties these reductions are generally within BRE guidelines and are unlikely to be noticeable. As such the proposed development is not considered by the Appellant to adversely impact the amenity of the surrounding residential properties. RRAG does not consider that the proposal accords with the legislation and will unacceptably impact upon a number of existing dwellings.
 - 9.1.5 The extent of the benefit to the railway station. The Appellant considers that the station and public realm improvements proposed represent a substantial public benefit. RRAG considers that the benefits are notably reduced due to the arrangement of the proposed facilities and the specific details of the changes proposed including the increased focus on the northern (Site B) entrance which is further from the town centre
 - 9.1.6 Whether the scheme will have a positive contribution towards sustainable transport. The Appellant considers the Appeal Scheme, through the proposed station and public realm works make a clear qualitative improvement to the existing facilities on site which promotes sustainable transport methods and incentivises a modal shift away from the reliance on the use of private car. RRAG consider that the measures set out in the scheme fall below current good practice standards and furthermore will make it more difficult and costly to deliver future improvements to enhance sustainable transport movements and create a Transport Interchange. They also fail to enhance the safety of people accessing

Site B by walking, wheeling and cycling and in particular do not redress the current situation where disabled rail users are marginalised.

- 9.1.7 Whether the proposal provides sufficient financial contributions towards off-site facilities to meet the needs of the development in accordance with policy expectations. The Appellant states that the Appeal Scheme is supported by an updated viability assessment which has informed a Section 106 Agreement between the Appellant and the Council. In addition to the bus station, improvements, parking monitoring, car clubs and travel plans which will be secured via the Section 106 Agreement, the agreement will also include another obligation to secure a review mechanism in terms of potential affordable housing contributions. RRAG consider that the lack of financial contributions in lieu of the on-site open space provision, education, healthcare and community facilities to meet all the requirements of future residents is a significant shortfall of the scheme.
- 9.1.8 Whether the scheme's benefits outweigh the harms. The Appellant considers that the scheme accords with the development plan as a whole. If, however, it is considered that the Appeal Scheme does not accord with the development plan then it is the Appellant's case that the public benefits, when considered in the context of the 'tilted balance' being engaged, would represent a significant improvement which lend further justification in favour of the grant of planning permission. RRAG consider that the harms significantly and demonstrably outweigh the benefits; consequently, RRAG consider that the appeal should be dismissed.

10 Third Party Representations

- 10.1 There were at least 2,043 third party representations including 82 in support and 11 neither objecting nor supporting the Application which raised matters associated with the Appeal Scheme. The objections included matters regarding:
- 10.1.1 Crime fears
 - 10.1.2 Drainage and sewage capacity
 - 10.1.3 Flooding
 - 10.1.4 Harm to Conservation Area
 - 10.1.5 Harm to listed building
 - 10.1.6 Harm to wildlife habitat
 - 10.1.7 Hazard to highway safety
 - 10.1.8 Health fears
 - 10.1.9 Impact on/lack of infrastructure and facilities/amenities in local area to support increased population
 - 10.1.10 Inadequate parking
 - 10.1.11 Inconvenience during construction
 - 10.1.12 Increase in traffic and congestion
 - 10.1.13 Loss of buildings
 - 10.1.14 Loss of/harm to trees
 - 10.1.15 Noise & disturbance
 - 10.1.16 Out of character with surrounding area
 - 10.1.17 Overbearing relationship
 - 10.1.18 Overdevelopment
 - 10.1.19 Overlooking and loss of privacy
 - 10.1.20 Overshadowing
 - 10.1.21 Poor design
 - 10.1.22 Poor housing mix and lack of affordable homes
 - 10.1.23 Station improvements will make access worse for station users
- 10.2 Save for the points raised in the reason for refusal of the original application (Section 9), the Council does not take issue with the proposed development on the basis of any of the other points raised by Third Parties.

Signed on behalf of Redhill Residents Action Group: 	Signed on behalf of the Appellant: 
Date: 06/08/2025	Date: 06/08/2025
Name: Jonathan Weekes, Beta Town Planning Ltd	Name: Mr Charles Mills MRCIS ARTPI
Position: Planning Witness for RRAG	Position: Partner – Daniel Watney LLP

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