

18 January 2007

South East of England Plan Examination in Public

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## Introduction

This statement responds to the issues raised under Issue 8Hi.5 in the Final List of Matters (Issued 12 October 2006 with revisions 24 November 2006). Issue 8Hi.5 relates to Guildford, Woking and Redhill and asks whether the proposed strategy adequately reflects their role and potential within policies LF4 and LF7.

The statement is submitted on behalf of Morley Fund Management ('Morley') which is a leading UK institutional asset management company with a range of assets throughout the South East of England region.

Morley has a significant interest in Redhill, as the long lease owner of the Warwick Quadrant, Sainsbury's and a number of office buildings. Morley considers that this interest provides a major opportunity for sustainable urban growth through its re-development.

## The Role and Potential of Redhill

### *(1) A Regional Centre*

Redhill/Reigate is identified by RSS Policy TC2 as being a Primary Regional Centre. Policy states that such centres will be a focus for:

- i) Major retail development
- ii) Uses which attract large numbers of people including major cultural, tourism, social and community venues
- iii) Employment, particularly large scale leisure and office (Class B1a) development
- iv) A range of housing, where possible as part of a wider mixed use developments.

Within the London Sub-Region Reigate and Redhill is also identified as one of three regional hubs, together with Guildford and Woking (Section E5 Paragraph 1.5). Redhill is also identified as a Regional Transport Hub.

Policy LF7 – Town Centres and its supporting text clarifies that town centres (e.g. Redhill and Reigate – our clarification) should be the main focus for mixed use development and for major development. Investment in development, infrastructure and services will be directed to the three regional hubs.

### *(2) Development Potential*

Given this strong and unequivocal policy thrust towards promoting development in the London Fringe's regional centres Morley has significant concern regarding Paragraph 1.5. This states that:

*“The sub-region has three regional hubs – Guildford, Reigate and Redhill and Woking. Each plays an important part in the local economy but they do not have the capacity for major growth.”*

The retention of the second sentence could also undermine the underlying policy thrust towards promoting development in these regional centres. In particular it could be used to justify larger developments in other centres which are not well placed to serve this sub-region. This could increase leakage of expenditure flows from the sub-region to the detriment of the vitality and viability of the Regional Centres and contrary to sustainability objectives to reduce the need to travel.

Morley considers with respect to Redhill that the statement is factually inaccurate.

Morley is concerned about the basis on which a conclusion has been reached that Redhill does not have capacity for major growth. Morley is currently in discussions with Reigate and Banstead Borough Council about the redevelopment of their interests at The Warwick Quadrant and surrounding land. This property interest alone provides a major opportunity for sustainable urban growth. It is important that regional policy does not undermine this development potential which can help meet the existing and future needs for retail, leisure and other services for the community, a community itself which can be enhanced through the provision of new residential accommodation as part of a mixed use development offering both jobs and housing.

Indeed the delivery of new retail floorspace and the development of other new town centre uses within Redhill is essential to ensure that the needs of the Borough's residents and visitors are met and that its position in the retail hierarchy is maintained in light of growing competition from other centres including Crawley and Guildford all of which have proposals for major retail growth.

For this reason it is recommended that the following sentence be deleted from paragraph 1.5 of Section E5 in respect to Redhill:

*“Each plays an important part in the local economy but they do not have the capacity for major growth.”*

Alternatively if there are substantiated concerns over growth in certain areas it should be clarified that this restriction does not reflect the potential afforded in Redhill town centre.

### *(3) Transport Hub*

Redhill's continued identification as a regional transport hub is supported by Morley. Morley also considers that the redevelopment potential of the town centre provides an opportunity to improve the transport interchange offer in Redhill to reinforce this role in a town centre location – consistent with Policy LF7.

Morley object however to the suggestion that significant improvements to transport infrastructure should be linked to restraint based town centre parking strategies (Policy LF7). Whilst, Morley support the promotion of modes of transport other than the private motor car it is important to recognise the role the private car plays in the viability of a centre such as Redhill. The provision of adequate car parking is essential to enable regional centres such as Redhill to compete with larger centres such as Bluewater. It is, therefore, inappropriate to pre-define a restraint based approach to car parking provision. Whilst appropriate to consider future car parking needs alongside

public transport provision, such pre-empted preclusion of car parking could undermine the future vitality and viability of centres such as Redhill.

For this reason Morey suggest deletion of “restraint-based” from the third paragraph in Policy LF7.

### **Summary of Key Issues**

In response to issue 8Hi.5 for consideration at the Public Examination Morely would draw the following conclusions:

- The identification of Redhill/Reigate as a Primary Retail Centre in the South East Region and a Regional Hub in the London Fringe Sub Region is consistent with its existing role.
- It is appropriate to focus new development and growth in such centres.
- It is imperative that there is consistency between the policies and supporting text in the Plan to ensure that the growth objectives for such centres can be met. In this regard it is inaccurate to state that Redhill/Reigate does not have capacity for major growth. The second sentence in Paragraph 1.5 in Section E5 should be deleted insofar as it relates to Redhill.
- The redevelopment potential of Redhill town centre provides an opportunity to improve the transport its public transport interchange offer.
- When formulating public transport strategies it is important to have regard to the fact that the provision of adequate car parking is essential to enable smaller centres such as Redhill to compete with larger centres such as Bluewater. The words “restraint-based” should therefore be deleted from the third paragraph in Policy LF7.