Tandridge District Council Local Plan
Examination Statement
Redhill Aerodrome Ventures Ltd
3rd September 2019

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1. Summary

1.1. RAVL considers that Redhill Aerodrome offers a significant opportunity to support the provision of housing to help meet Tandridge's substantial housing need. The submitted local plan proposes a level of housing below the recognised housing need, and does not allocate Redhill Aerodrome for housing use. RAVL considers that in the absence of such an allocation, then Tandridge should properly, positively and effectively plan for employment use on the site, which will necessitate its removal from the Green Belt. RAVL’s Reg 19 representation proposed that the airfield in its entirety should be removed, however in the absence of this, the employment policy area, together with appropriate expansion land within defensible boundaries, should be removed. This would be consistent with the Government’s approach to the Green Belt purposes in the NPPF, as part of the site is previously developed land contributing little to the Green Belt.

2. Introduction

2.1. This statement is submitted by Redhill Aerodrome Ventures Ltd, the parent company of Redhill Aerodrome Ltd and Redhill Aerodrome Trading Ltd which between them hold the entire freehold interest of land at Redhill Aerodrome (all “Redhill Aerodrome”)

2.2. Redhill Aerodrome has been in the current ownership for some 27 years. It comprises, including adjoining land under ownership, some 570 acres of land and property located some 3 miles South East of Redhill, and c.4 miles North East of Gatwick. The M23 motorway is located to the east of the property, and the A23 to the West. It is within the administrative areas of both Reigate and Banstead Borough Council (RBBC) and TDC, and wholly within the County of Surrey. It is located in the Metropolitan Green Belt. It includes some c.30,000 m² net theoretically lettable commercial premises and aerodrome infrastructure, the majority of which is located within Tandridge.
2.3. Redhill Aerodrome is a CAA licensed airfield. It consists of three licensed grass runways and a hard taxiway / perimeter track. Part of the southern taxiway operates as a CAA recognised unlicensed runway in the winter months when grass runways suffer from waterlogging. Infrastructure includes a control tower, airfield lighting, hard-standing for the parking of aircraft, and fuelling facilities.

2.4. RAVL has previously (10th September 2018) submitted representations to the 2018 Reg 18 consultation. In this representation RAVL set out in detail the challenges faced by the aerodrome in terms of declining aircraft movements and so turnover, increased cost burdens, and long term viability challenges despite some £1.9m recent investment in operational infrastructure. The structural viability challenges faced by the aerodrome continues with draft December 2018 accounts showing an operational loss of over £500,000 for the consolidated businesses including operational aerodrome and landside commercial accommodation activity. There is a pressing need for the aerodrome to drive aviation and commercial turnover to seek to close this viability gap. Aviation turnover is driven by aircraft movements, and an ambition to return towards historic levels of movements have been resisted by the Local Planning Authorities application of Green Belt policies.
3. **Examination Main Matters**

**Matter 1 – Procedural / Legal Requirements**  
**Community Involvement**

Has the Council complied with the requirements of section 19(3) of the 2004 Act and Regulations 18 and 19 of the Town and Country Planning (Local Planning (England) Regulations 2012 with regard to conducting consultation in accordance with their statement of community involvement?

Has the SA taken into account the reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

3.1. The 2018 Reg 19 consultation version of the emerging local plan was published 30th July – 10th September during the school holidays. RAVL’s representation noted that RAVL had been prejudiced by this timing. The Statement of Consultation July 2019 submitted by TDC noted at para 5.3 “Whilst it is recognised that the consultation period partially took place over the school summer holidays, the level of responses received indicates that the timing of the consultation did not prevent statutory bodies, the community or other interested parties from responding and was not detrimental to the process.” TDC then notes at para 5.25 that “1,746 comments were received from 1,639 individuals and interested parties” In contrast it should be noted that the recent (2017) Guildford local plan Reg 19 consultation attracted “approximately 9,500 comments from around 3,300 individuals, organisations and stakeholders” and the recent (2019) Sevenoaks local plan Reg 19 consultation attracted representations from “1,956 organisations and individuals and a total of 3,566 comments were made”.

3.2. RAVL’s representation also noted the material procedural flaws and irregularities in the preparation of the local plan, primarily relating to predetermination, a failure to properly seek to meet their housing need, and a failure to comply with the aviation related provisions of the NPPF 2018.

3.3. The representation also noted that the plan failed to recognise the extensive brownfield element of the Aerodrome, or to properly and positively plan for the proposed status as an “Important Employment site”.

3.4. The version of the plan which was actually submitted to the Planning Inspectorate for examination was not that which was the subject of Reg 19 2018 consultation. The Inspector’s guidance note ID4/V2 notes at para 3 “The Plan to be examined is the Tandridge District Council Our Local Plan:2033 (the Plan) (Publication version July 2018)”. The actual version available on the Council’s website as being submitted is an extensively tracked changed version.

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1. [http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=26744&p=0](http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=26744&p=0)


3.5. Whilst many of the changes in the tracked changed document appear to be grammatical or stylistic in nature, many changes amend or change policy. Matters that are particularly relevant to RAVL include

3.5.1. Para 10.3 – Spatial Objective SO1 and SO15
3.5.2. Para 15.3 and TLP04 – Application of s.106 and CIL guidance note
3.5.3. TLP04 – timing of infrastructure provision, and mitigation beyond policy
3.5.4. Para 23.9 – Use of Article 4 Directions and TLP20 relaxing loss of employment use criteria
3.5.5. IES05 – detail on the site specific policy requirements for Redhill Aerodrome

3.6. RAVL has not had an opportunity to comment on this latest version. The inspector’s Guidance Notes clarify that the June 2018 publication plan will be that which is Examined. RAVL considers that all parties should be provided an opportunity to make further representations to any material changes to that version.
Matter 2.5 Employment Growth and 3.1 Spatial Strategy

Are the assumptions made in respect of employment growth realistic? Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

3.6.1. The tracked changed plan Policy TLP20 notes the council seeks to identify 15.3ha (net) of additional employment land, and also relaxes the criteria for change of use for existing employment premises. It identifies 4x Strategic Employment Sites and 7x Important Employment Sites, one of which is Redhill Aerodrome. The Policy TP1 states for Important Employment Sites “These are good quality employment sites that offer diversity to the types of employment in the District. These sites will be protected for their employment use and intensification supported where appropriate”

3.6.2. As articulated in RAVL’s Reg 19 representation, this aspiration has been shown to be inconsistent with the Council’s track record of implementation of Green Belt policies which is articulated at para 14.7 “the construction of new buildings is inappropriate in the Green Belt” and TLP03

3.6.3. TLP22 (Rural Economy) provides that the “Council will positively consider” ….the “provision of well designed new buildings of appropriate scale” however this again is directly contradicted by TLP03 and Green Belt policy.

Matter 4 – Green Belt

Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?

In terms of paragraph 84 of the Framework, have the proposed alterations to the Green Belt boundaries taken account of the need to promote sustainable patterns of development and are they consistent with the Local Plan strategy?

Have all realistic alternatives to releasing land from the Green Belt been considered, such as further development in the urban area or increasing development densities, and would the most efficient use of land proposed for release from the Green Belt be made?

Is the site selection methodology for sites to be released from the Green Belt robust and are the proposed alterations to the Green Belt boundaries justified?

3.6.4. RAVL considers that the assessment of candidate sites for removal from the Green Belt has not been consistent, and that Redhill Aerodrome has not been properly considered.

3.6.5. Para 23.23 of the Plan notes that “some alterations to the Green Belt boundary for Strategic Employment Sites have taken place” It refers to the Green Belt Assessment (Part 3) Exceptional Circumstances and Insetting (June 2018) which establishes at its Para 3.46 the process for assessment of employment sites for exceptional circumstances testing.
3.6.6. This *Exceptional Circumstances and Insetting* document considers Redhill Aerodrome as a candidate for Garden Community allocation, and at Para 4.13 considers that *Redhill Aerodrome is Ecologically Suitable, being of relatively low ecological interest*…. And further at 4.14 *The landscape evidence notes Redhill Aerodrome’s open character and its relatively level topography, concluding that it has potential to accommodate a new settlement*.

3.6.7. The Appendix to this document⁴ includes the assessment of Redhill Aerodrome (ENA11) in exceptional circumstances terms. RAVL noted in its Reg 19 representation that the boundary for the employment allocation is drawn too tightly around the existing buildings, and this failing is also identified in this EC assessment and contributes to its conclusion. The Assessment that its identified purpose of preventing *sprawl into Tandridge* is subject to further exploration – (review of the aerodrome location will demonstrate that this merely relates to the boundary with Reigate and Banstead Borough Council’s administrative area rather than *sprawl from large built up areas beyond the District*).

3.6.8. The assessment also confuses the wider assessment carried out for the purposes of Garden Community assessment with that for employment, particularly with regard to flood risk (ENA11 does not suffer from “significant

surface water flooding") and the purpose of separating Redhill from South Nutfield.

3.6.9. The assessment notes however that

3.6.9.1. the site is previously developed and is recommended to be protected as an employment site in the Employment Needs Assessment as it would help to protect and enhance levels of employment in the area

3.6.9.2. is of poor quality Agricultural Land Value,

3.6.9.3. is suitable for development from an ecology perspective and its development would present the opportunity to secure biodiversity enhancement opportunities,

3.6.9.4. it doesn’t contribute to rural character and that landscape impact (judged to be moderate landscape sensitivity and value) could be mitigated through building heights restriction and

3.6.9.5. its development would be an opportunity to enhance its contribution to the local landscape.

3.6.10. The Assessment’s conclusion that it does not justify EC necessary for Green Belt release is acknowledged to be a matter of planning judgement.

3.6.11. In contrast the Council has considered that Westerham Road Industrial Estate, Lambs Business Park and Hobbs Industrial Estate do meet the Exceptional Circumstances test to be removed from the green belt.
3.6.12. Lambs Business Park is assessed in the Appendix to the Exceptional Circumstances and Insetting document, and the following points are noted

3.6.12.1. “However the intensification of employment on this site may potentially result in materially greater impacts on the surrounding Green Belt, particularly if no robust and defensible boundary is identified”

3.6.12.2. “…… however there is s.41 woodland which is ecologically unsuitable. Development should be located in the ecologically suitable parts of the site and hedges, mature trees and areas of s.41 deciduous woodland should be retained and buffered, which would also serve to protect the native bluebell record. It would also be necessary to provide an unlit buffer zone around the site’s boundary features, particularly the mature and veteran trees, the areas of s.41 woodland and the pond, to provide dark corridors for commuting and foraging bats.”

3.6.12.3. The site is good Grade 3 and 4 Agricultural Land Value and is adjacent to ancient woodland and SNCI and development may adversely affect these receptors.

3.6.12.4. It is acknowledged that the site’s development could impact on the wider Green Belt

3.6.12.5. In conclusion it considers that as a matter of planning judgement that the site does justify exceptional circumstances

3.6.13. The Council’s assessment of Lambs Business Park appears to rely heavily on its opportunity for employment provision, particularly it proposed “Green Technology Park” and its opportunity for higher skill based employment. The council does not appear to have consistently applied its criteria for assessment, in that it makes no such reference to the existing aviation based higher skills provision at Redhill Aerodrome

3.6.14. Likewise the Council’s assessment of the Hobbs Industrial Park notes the presence of on site Ancient Woodland constraining future development and its separation from public transport

3.6.15. Again the Council’s assessment of Westerham Road Industrial Estate notes its isolated location, its close proximity to Tilsey Woods SSSI, SNCIs and Ancient Woodland and its contribution to preserving the setting of a conservation area and containing sprawl from Oxted, it would be difficult to mitigate effects on the AONB and like Redhill Aerodrome is of medium landscape sensitivity

3.6.16. RAVL considers that whilst there will be positive and negative attributes to any site’s Green Belt assessment, the Council has not been consistent in its application of criteria, and that Redhill Aerodrome should be considered for Green Belt release alongside these 3 Strategic Employment Sites.

3.6.17. Whilst RAVL considers that, as articulated in its representations to the TDC Local Plan, in order to properly support the Aerodrome in line with the Government’s Aviation Strategy and the NPPF the entire Aerodrome site and business accommodation should be removed from the Green Belt. Should TDC not be willing to do this, an opportunity exists to remove the business premises from the Green Belt, including appropriate expansion land. To the north this
could include an area of land or some 0.2ha that TDC has confirmed has permitted development rights for a car park for some 62 car spaces.\footnote{Application No: TA/2016/1812


3.6.18. To the south an area that is bounded by the taxiway could be included comprising some 0.5 ha.
3.6.19. This latter area could, subject to proper assessment and cooperation with Reigate and Banstead District Council (in which part of this area sits) form part of a larger expansion area of some 9.6ha, bounded by the taxiway (with suitable offset) woodland to the south west, and Kings Mill Lane.

3.6.20. The TDC local plan identifies at para 23.23 some 0.43ha of potential available space at Redhill Aerodrome, however RAVL understands that this refers to the land subject to the completed construction of the replacement building for a fire damaged property (with broadly equivalent footprint), and does not constitute additional land.

3.6.21. TDC has published evidence in support of their employment policies, including the Tandridge “Economic Proposition Delivery Plan 2018-2019”6 This follows the Economic Proposition 2017-2022 which specifically refers to Redhill Aerodrome’s largest office occupier, Bristow Helicopters, as one of 6 employers of note in the District in its opening paragraphs titled Why Tandridge.

3.6.22. The Economic Proposition Delivery Plan (“EPDP”) identifies particular areas where support is required for business, including enabling micro businesses to survive and grow (for example into larger premises), supporting high tech employment, and improve access to airport / transport links (presumably specifically Gatwick).

3.6.23. The EPDP identifies Lambs Business Park and Hobbs Business Park as locations for delivery of these goals, however it is not clear how a proposal for a data centre at Lambs business park, which is not well located for Gatwick, or intensification of employment at Hobbs Business Park, like Lambs Business Park also on A22 corridor, will achieve these aims.

3.6.24. Savills “Viability and Employment Needs Consideration Report” submitted in support of Thakeham’s representation to TDC Local Plan Reg 19 consultation notes at its para 1.1.4 that “the Council’s own evidence concludes new commercial development at the Lambs Business Park (adjacent to the South Godstone Garden Community) is not viable. The Redhill Garden Community on the other hand is located within the region’s most significant economic corridor, the M23, and is better located with respect to rail and strategic road infrastructure as well as key economic centres including London, Gatwick Airport / Manor Royal, East Surrey Hospital and Brighton.”

3.6.25. The Savills report goes on to note that development viability deriving from achievable rents and constructions costs etc at South Godstone (Lambs Business Park) is considered to be negative for office use, and low for industrial, and this must put into question the deliverability of employment accommodation at this location in line with the aspirations of the EPDP.

3.6.26. By contrast, Savills show that Redhill Aerodrome’s location has potential to derive positive viability for both office and industrial uses.

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3.6.27. It should also be noted that out of Redhill Aerodrome’s c.28,000m² of accommodation, a range of business premises are available on flexible terms and at differing levels of specification and pricing. Office suites are provided from 126 sq ft (c.12m²) up to c7,000 sq ft (c.650m²), and premises are currently available with a variety of letting arrangements, including all inclusive rentals. Accommodation is available with or without air conditioning and in new and refurbished premises, and in more basic condition. Vacant premises are widely advertised through the Aerodrome’s own website, through that of the retained agent Stiles Harold Williams, and by means of letting boards and particulars on site.

3.6.28. RAVL’s agents proactively manage the estate to facilitate tenant’s growth, and there is a track record of tenants upgrading their accommodation into newer / larger suites on site. Business occupiers represent a range of aviation and non aviation uses, including healthcare, professional and IT services, engineering and science. It is located on the Gatwick / London transport corridor.

3.6.29. Accordingly Redhill Aerodrome already functions to fulfil the required support areas identified in the EPDP.

3.6.30. RAVL considers that TDC has not properly or consistently considered the allocation of Employment sites in the local plan.

Matter 7 – 7.37-7.40

IES05: Redhill Aerodrome Industrial Area, South Nutfield

What is the purpose of the allocation? Given that the site is situated in the Green Belt and national policy in paragraph 89 of the Framework sets out that the construction of new buildings in the Green Belt should be regarded as being inappropriate other than in the listed exceptions, would the Policy be effective in providing for the intended employment development? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

Are the proposed Modifications necessary for soundness?

7 http://property.shw.co.uk/propertyInfo/12691/Redhill-Aerodrome-Business-Centre-Kings-Mill-Lane-Redhill-Surrey--RH1-5JZ
http://property.shw.co.uk/propertyInfo/14708/Phoenix-House-Redhill-Aerodrome-Kings-Mill-Lane-Redhill-Surrey--RH1-5JY
http://property.shw.co.uk/propertyInfo/12429/Aero-16-Redhill-Aerodrome-Kings-Mill-Lane-Redhill-Surrey--RH1-5JY
3.7. RAVL’s September 2018 Reg 19 representation noted that the airfield operational viability challenges were exacerbated by the application of restrictive Green Belt policies, constraining and frustrating the growth and development of the aerodrome and ancillary accommodation. These challenges continue, with ongoing enforcement action over different interpretation of permitted development rights relating to a taxiway.

3.8. The strict application of Green Belt policies has continued to constrain and inhibit the renewal of aged commercial accommodation, some of which dates from the 1930s. Permitted development rights do not extend to the commercial premises estate, and accordingly the full force of Green Belt policy restriction is applied. Where consent has been granted for replacement premises, the policy requirements have resulted in build cost at a level that significantly threatens viability. RAVL considers that in order for Redhill Aerodrome to be a meaningful employment site, it should be removed from the Green Belt.

3.9. RAVL’s comments under matters 2 and 5 above refer specifically to this matter and the IES05 policy. In particular it should be noted that town centre uses are already materially present at the Aerodrome.

3.10. It is not immediately clear to RAVL why IES05 specifically identifies traffic calming on A25 as a mitigation measure that requires contribution from Redhill Aerodrome.

Matter 8 – Development Management Policies

TLP22: Rural Economy

8.29 Is the Policy consistent with national policy for Green Belts given that the potential development envisaged within the criteria may constitute inappropriate development which is by definition, harmful to the Green Belt? Would the policy be effective in supporting a prosperous rural economy?

3.11. As articulated at matter 4 above, RAVL considers that the Green Belt policy does not support development, and that the IES05 policy “Proposals for Redhill Aerodrome will be supported where they are sensitive to the location in the Green Belt” are self defeating.