Examination Statement

Land at Redhill Aerodrome

Thakeham Homes

Tandridge District Council – Local Plan 2033

Examination in Public

Matter 2 – The Provision of Housing
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1. Introduction

1.1. This Examination Statement is submitted by Savills on behalf of Thakeham. Thakeham is the sole promoter of Land at Redhill Aerodrome alongside development partners Quintain.

1.2. Prior to the submission of the Local Plan by Tandridge District Council (TDC) to the Planning Inspectorate for examination, Thakeham and their consultant team have participated in the formal consultations of the Local Plan at Regulation 18 stage in December 2016 and September 2017 and to the Regulation 19 stage in September 2018. In addition, the site has been submitted to relevant call for sites for the Housing and Economic Land Availability Assessment (HELAA) and Thakeham and their consultant team have met with Planning Policy Officers throughout the process to discuss the strategic opportunity at Land at Redhill Aerodrome.

1.3. Thakeham made a number of objections to the Regulation 19 consultation of the Local Plan, which should be read alongside this Hearing Statement. It is our view that the Local Plan as submitted is not sound on the basis of legal compliance including Duty to Cooperate, the evidence base including Viability and Sustainability Appraisal and the allocation of South Godstone as a Garden Village.

1.4. The Land at Redhill Aerodrome is located across the administrative boundaries of both TDC and Reigate & Banstead Borough Council (RBBC) and therefore Thakeham has also been engaging with RBBC as part of the preparation of their Development Management Plan (DMP).

1.5. The location of the site, its surroundings and the vision for the Garden Village at Redhill Aerodrome were set out in detail in the representation to the Regulation 19 Local Plan Consultation and have therefore not been reproduced in this statement.

1.6. In addition to Thakeham making representations in relation to their interests at Redhill Aerodrome, they are also part of the Developers Forum.
2. **Response to the Inspectors Questions**

2.1. The Tandridge Developers Forum, of which Thakeham is part, responds to matters of Objectively Assessed Needs (OAN) in detail.

2.2. Thakeham will be represented by the Developers Forum at the hearing sessions relating to Matter 2 however have submitted this Statement to cover additional matters specifically relating to their interests.

**Matter 2 - The Provision of Housing**

1. **A: Calculation of the Objectively Assessed Need for Housing (OAN)**

**ISSUE:** Is the basis for establishing the OAN for Tandridge consistent with national policy and guidance?

**Q.2.5 Are the assumptions made in respect of employment growth realistic?**

2.3. No.

2.4. The assumptions made in respect of employment growth are not considered to be realistic. TDC have assumed the delivery of 1.982 jobs per dwelling, to meet the baseline economic growth of 15.3 ha of Class B employment space over the plan period. This is against a current ratio of 1.099 jobs per dwelling in the District (Balancing Homes and Job Requirements in the Tandridge District Local Plan Topic Paper, 2016).

2.5. The reason for the significantly increased ratio is that no changes in levels of commuting are expected over the plan period. This is a result of TDC’s target to reduce in-commuting and effectively means that the assumed delivery of 1.982 jobs per dwelling accounts for no increase in commuting levels over the plan period, despite significant economic and residential growth.

2.6. On the basis of the chosen spatial strategy and development allocations when compared to the existing dwelling to job ratio in the District the delivery of 1.982 jobs per dwelling is considered to be too high. The proposed strategy is not considered to improve the self-containment of the District (as set out in Thakeham’s response to Question 5.2 in the Matter 5 Statement) and therefore it is unrealistic to assume
no increase in in-commuting over the plan period arising from the chosen strategy. In order to ensure that the employment growth required over the plan period is met a lower job per dwelling ratio should be adopted, resulting in the need for a greater OAN, or alternatively, a strategy which is likely to effectively reduce in-commuting, such as the allocation of Redhill Aerodrome as a location for a new Garden Community rather than South Godstone should be taken forward.

2.7. Thakeham address concerns with respect of the economic/ employment delivery assumptions in the submitted Hearing Statement for Matter 5.

2. C: The overall supply of housing

ISSUE: Is the proposed supply of housing for the Plan period realistic?

Q.2.15 In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on a sound understanding and robust evidence of viability?

2.8. The housing delivery proposed through the plan and set out in the trajectory is not based on a sound understanding or robust evidence of viability. As set out in Thakeham’s Regulation 19 representations and the accompanying Viability and Employment Need Consideration Report (September 2018), there are a number of flaws within the Viability Assessment, particularly surrounding the South Godstone strategic site. It is unclear from TDC’s evidence base what the delivery trajectory of South Godstone is, and it is known that a further Area Action Plan (AAP) process will be required, alongside extensive Compulsory Purchase (CPO) arrangements to enable delivery. These matters are addressed in the Forum’s Statement on Matter 6 and the flaws in relation to the Viability Assessment are detailed in the previously submitted documents mentioned above. The flaws in the Viability Assessment however are summarised below:
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- TDC are deferring too much of the detailed assessment of the South Godstone site to be determined in the AAP. Whilst it is accepted that a degree of deference is necessary, because detailed proposals have not been produced to date, it is still necessary for TDC to robustly test the viability of the delivery of development at the site. It does not appear that a realistic assumption of costs associated with the South Godstone site has been made, particularly in regard to infrastructure costs and potential CPO costs;

- There is also a risk that South Godstone may not be capable of delivering employment floorspace due to the poorly performing market for such uses in the area and the infrastructure improvements required to make the site attractive to prospective end users; and

- There are a number of disparities in the BNP Viability report, these include:
  
  - The use of the same residential values for both South Godstone and Redhill Aerodrome, despite clear evidence of higher values in the Redhill Aerodrome locality;
  - The BNP assessment has not adopted all of the uses set out in Policy SGC01 in the tested scheme for South Godstone;
  - The BNP assessment has included lower costs for infrastructure than the TDC Infrastructure Delivery Plan (IDP); and;
  - Commercial values used in the BNP assessment are not aligned with actual values in South Godstone.

2.9. In summary, the housing delivery and trajectory proposed through the plan is not based on robust evidence of viability and therefore is not justified and the plan is considered to be unsound.

2.10. In addition, and as a general comment, the feasibility and viability of the Local Plan as a whole would be assisted through the allocation of a broad range of development sites and opportunities, including the alternative Garden Village proposal at Redhill Aerodrome.
Q.2.16 Given that the proposed South Godstone Garden Community is intended to deliver around 1,400 new homes in the Plan period and the details of the development would be considered by an Area Action Plan (AAP), would it be effective to include within the Plan a Policy which commits the Council to a review of the Plan if the AAP is not adopted by a specified date in order to sustain the supply of housing?

2.11. Yes. The delivery of housing at South Godstone is a key part of the plan, intended to deliver approximately 23% of the housing target over the plan period. Consequently, it is vital that TDC proceed with a robust and co-ordinated plan for the development of the site.

2.12. This should include contingencies to provide the 1,400 units that are proposed be delivered during the plan period on the South Godstone site elsewhere within the District, should the delivery of the South Godstone site be delayed or the site not come forward. This is particularly important given the uncertainties surrounding the delivery of the South Godstone site as detailed in the Forum’s Hearing Statements and Thakeham’s Regulation 19 representation and Statements on other Matters, in part arising from the need for a CPO.

2.13. Should the adoption of the AAP to be delayed, then the delivery of 1,400 units within the Plan period will be jeopardised. As such, contingencies, such as the delivery of development at the Redhill Aerodrome site or the requirement for a review of the plan should be built into the plan to ensure that housing needs over the plan period will be met.
3. Conclusion

3.1. As set out in the comments made above in respect of the Inspector’s Main Issues and Questions Thakeham, and its development partner Quintain do not consider that the OAN for Tandridge is consistent with national policy or guidance, as set out in the Forum’s Statement and therefore the plan has not been positively prepared.

3.2. In addition, Thakeham do not consider the proposed supply of housing over the plan period to be realistic or justified by robust evidence and therefore the plan is considered to be ineffective.

3.3. As a result, Thakeham consider that in order to be found sound, major modification is necessary, particularly the removal of the South Godstone strategic site and its replacement with a more viable Garden Community, such as Redhill Aerodrome, which is justified by a robust evidence base. Should major modification not be brought forward then Thakeham consider that the Plan should be found unsound.