Examination Statement

Land at Redhill Aerodrome

Thakeham Homes

Tandridge District Council – Local Plan 2033

Examination in Public

Matter 3 - The Spatial Strategy
## Contents

1. Introduction 1
2. Response to the Inspectors Questions 2
3. Conclusion 8
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.
2. Response to the Inspectors Questions

2.1. Thakeham has informed the Programme Officer that they wish to participate at the hearing sessions relating to Matter 3 and will be represented by Savills at this Hearing.

Matter 3 - The Spatial Strategy

**ISSUE:** Is the spatial strategy and settlement hierarchy as set out in Policies TLP01, TLP06, TLP07, TLP08 and TLP09 justified as the most appropriate strategy and is it based on robust evidence?

**Q3.1** Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

2.2. Thakeham do not dispute that, due to the pattern of existing development within the District and the need to deliver considerable levels of new housing, the spatial strategy proposed by TDC to identify and deliver a new settlement, in order to deliver a significant quantum of new housing is an appropriate strategy. In addition, Thakeham consider that all realistic options for the distribution of development within the District have been identified. However as set out in Thakeham’s Regulation 19 representation and Thakeham’s Hearing Statements provided in relation to Matters 1, 2, 4, 5, 6 and 7, not all identified options have been considered consistently or robustly. As a result, whilst an appropriate spatial strategy is proposed, the location that has been taken forward for strategic growth, South Godstone, is not an appropriate location for the scale of development proposed.

2.3. Thakeham raise a number of serious concerns with the inclusion of South Godstone as the location for a new Garden Community, notably:

- It is not considered to be a deliverable or viable location for development of the scale proposed, these concerns are expressed in detail in our Statements for Matter 2 and 6; and

- The Green Belt Assessment undertaken by TDC is not considered to be adequate to conclude that the South Godstone allocation is the most appropriate location for development and therefore large scale Green Belt release. These concerns are expressed in greater detail in our Statement for Matter 4.
2.4. The land at Redhill Aerodrome is considered to be a far more appropriate location for large scale development, free of many of the constraints facing the South Godstone location.

2.5. It is of particular concern that the Sustainability Appraisal (SA) upon which the spatial strategy is predicated is based on incorrect information in respect of the deliverability of the new Junction onto the M23. This has resulted in a lower score being attributed to Land at Redhill Aerodrome through the SA than should have been and ultimately, the incorrect location for strategic development being taken forward through the Plan. This point is covered in more detail in relation to Question 3.2 below.

Q3.2 Is the proposed distribution of housing and other development supported by the Sustainability Appraisal, and will it lead to the most appropriate pattern of housing growth?

2.6. The proposed distribution of housing and other development is not supported by the SA and will not lead to the most appropriate pattern of housing growth. Thakeham has previously undertaken a comprehensive review of the SA in the Sustainability Appraisal Review (October 2017) which was submitted with our Regulation 19 representation. Thakeham have also raised concerns with the SA and the appropriateness of the assessments and conclusions contained therein at the Regulation 18 and 19 consultations stages. Despite the publication of updated Volumes 1 and 4 of the SA, Thakeham’s previous concerns remain unaddressed.

2.7. Thakeham’s principle concerns are that the assessment of the Land at Redhill Aerodrome is based upon incorrect information, and that the assessments within the SA have not been carried out in a consistent or robust manner, appearing to be largely based on TDC’s pre-determination that South Godstone is the most appropriate location for a new Garden Community.

2.8. Table 2.1 below provides the assessments of Redhill Aerodrome and South Godstone as per the January 2019 SA, as well as a revised score for both locations, prepared by Savills and submitted previously through the Sustainability Appraisal Review Document (September 2018) at the Regulation 19 consultation stage. Detail explaining the scores attributed to Redhill in the Savills assessment can be found in the Sustainability Assessment Review document previously submitted (paragraphs 6.7 – 6.10).
### Table 2.1 SA Assessment Comparison

<table>
<thead>
<tr>
<th>Site / Objective</th>
<th>1 Housing</th>
<th>2 Health</th>
<th>3 Cultural Heritage</th>
<th>4 Transport</th>
<th>5 PDL</th>
<th>6 Economics</th>
<th>7 Employment</th>
<th>8 Climate Change Mitigation</th>
<th>9 Natural Resources</th>
<th>10 Climate Change Adaptation</th>
<th>11 Flood Risk</th>
<th>12 Water Quality</th>
<th>13 Contaminated Land and Soils</th>
<th>14 Air Quality, Noise and Light</th>
<th>15 Landscape</th>
<th>16 Biodiversity</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Redhill Aerodrome (TDC Sustainability Appraisal)</td>
<td>++</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0 / -</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>3+ 11-</td>
</tr>
<tr>
<td>South Godstone (TDC Sustainability Appraisal)</td>
<td>++</td>
<td>-</td>
<td>+</td>
<td>-</td>
<td>+</td>
<td>?</td>
<td>/ ++</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>5+ 10-</td>
</tr>
<tr>
<td>Revised Redhill Aerodrome (see Savills Sustainability Appraisal Review)</td>
<td>++ ++</td>
<td>0</td>
<td>++ ++ +</td>
<td>+</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>16+</td>
<td>0-</td>
<td></td>
</tr>
<tr>
<td>South Godstone (see Savills Sustainability Appraisal Review)</td>
<td>++ 0</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
<td>3+ 7-</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

2.9. As can be seen from table 2.1, Redhill Aerodrome scores only slightly more negatively than South Godstone in the TDC assessment of the sites, with the lower scores attributed to Redhill Aerodrome relating to Transport, Economics and Employment (objectives 4, 6 and 7), all other scores are either equal or better for Redhill Aerodrome, based on TDC’s own assessment. Thakeham contest that in relation to Health, Cultural Heritage, Transport, Previously Developed Land (PDL), Economics, Employment, Climate Change, Natural Resources, Flood Risk, Water Quality, Contamination and Air Quality, Redhill should have scored more positively than South Godstone. The reasons for this are detailed in the Sustainability Appraisal Review submitted in support of Thakeham’s Regulation 19 representation (paragraphs 6.7 and 6.8) and therefore are not repeated here, although what Thakeham consider to be the most significant changes (those to PDL, Transport and Economics) are summarised below.
Examination Statement

**PDL**

2.10. The site includes significant areas of PDL, including a number of internal roads, taxiways and existing buildings which range in height but are typically two storey. The total floorspace of buildings on the Aerodrome is circa 33000 sqm. In addition the Area of Technical Assessment includes the East Surrey Hospital which is currently designated as a Major Existing Developed Site in the Green Belt. Consequently the proposals clearly constitute the best and most efficient use of previously developed land and the site should score positively in relation to this objective.

**Transport**

2.11. The SA sets out that Redhill Aerodrome is in a very good location to access railway stations including Nutfield, Earlswood and Salford, as well as a number of bus stops. It highlights that Redhill Aerodrome also benefits from an extensive network of public footpaths, bridleways and cycleways. The assessment continues that the baseline position with regard to public transport is therefore positive. Despite this the site scored negatively due to the likely reliance on private cars, this is clearly inconsistent with the positive baseline identified in relation to public transport.
2.12. In addition, the SA comments on page 242 that “Access to land is reliant on a new junction and link road off the M23, but to date no certainty of delivery of the junction has been demonstrated”. It concludes that the prospect of a new junction and the timescales for delivery therefore remain uncertain. This further contributes to the negative score attributed to Redhill in relation to Transport.

2.13. However, sufficient evidence has been submitted to TDC at the Regulation 18 and 19 consultation stages to provide assurances that the required new M23 junction can come forward, and discussions regarding such are advancing. This is a significantly more advanced position than the South Godstone site, which will require upgrades to Junction 6 of the M25 in order to provide suitable access.

2.14. In addition, South Godstone does not benefit from the same level of public transport links that the Redhill site does. As such, there is no justification as to why the South Godstone site has scored positively and the Redhill site has scored negatively in relation to this objective. The conclusions of the SA and the decision to allocate South Godstone as the Broad Location for a Garden Community are therefore considered to be unjustified.

Economics and Employment

2.15. The Redhill site has scored negatively in relation to economics and employment due to the fact that existing businesses will need to be relocated. By contrast South Godstone has scored positively in this regard due to the provision of jobs associated with the development and through the provision of a community hub, on the edge of the Gatwick Diamond. This assessment is clearly inconsistent. The Redhill site is located within the Gatwick Diamond, rather than simply ‘close’ to it, and would also provide a considerable amount of new jobs through the development, on a similar, if not larger scale, to those that would be provided at South Godstone. As such, it is not clear why the Redhill site has not scored as positively, or even more positively than South Godstone in this regard and the conclusions of the SA appear to be unjustified.
2.16. Furthermore, evidence has previously been submitted to demonstrate that South Godstone is an unviable and undesirable location for employment space and therefore any employment provision at South Godstone is unlikely to be utilised (see Viability and Employment Need Considerations Report, Savills, September 2018). As a result, whilst space may be provided for employment at South Godstone, this may not necessarily result in the provision of jobs, as such, South Godstone should score negatively in relation to this objective as set out in the table accompanying paragraph 6.7 of the previously cited Sustainability Appraisal Review document (September 2018). Further detail regarding the economic benefits of each site is also provided in our Statement for Matter 5.

2.17. In conclusion, it is clear that, had Redhill Aerodrome been assessed fairly using a scoring system consistent with that for South Godstone, and correctly based on up to date and accurate information, the SA would have concluded that the most appropriate location for large scale housing growth within the District is Redhill Aerodrome. As a result the Spatial Strategy taken forward through the Local Plan, with regard to the specific location of development would have been different. Consequently, the proposed distribution of development is considered to be based on inadequate evidence and therefore the Plan is considered ineffective and unsound.

Q3.3 Is the distribution of new homes between the Tiers of settlements and proposed garden community justified and how has it been established?

2.18. As set out previously in this Statement, Thakeham supports the spatial strategy insofar as it supports the development of sites around Tier 1 and 2 settlements and the delivery of a new Garden Settlement. Thakeham also raise no objection to the distribution of new homes between the Tiers of settlements and the proposed Garden Community. The distribution is considered to be an appropriate approach to housing delivery which will ensure the delivery of homes in the short term in sustainable locations, supporting existing services, whilst allowing the medium / long term delivery of homes, on a larger scale to come forward later on in the plan period, once the inevitable infrastructure upgrades / requirements have been put in place. For reasons set out in this and Thakeham’s other Statements, Thakeham do however dispute whether South Godstone is the right location for a new Garden Community.
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 consider that the spatial strategy is appropriate as a mechanism for delivering the required housing, however the location selected for the new Garden Community, South Godstone is inappropriate and not justified by robust evidence and therefore the plan is considered to be ineffective. Redhill Aerodrome is a more appropriate site, which is justified by evidence submitted in the form of Thakeham’s Hearing Statements and previous Regulation 18 and 19 representations.

3.2. As a result, in order to be found sound, major modifications are required, notably the removal of South Godstone as a strategic site and its replacement with a viable site, that is justified by the evidence, such as the Redhill Aerodrome site. Should major modifications not be brought forward them Thakeham consider that the plan should be found unsound.