Examination Statement

Land at Redhill Aerodrome

Thakeham Homes

Tandridge District Council – Local Plan 2033

Examination in Public

Matter 4 - Green Belt Boundary Alterations
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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.
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 4 and will be represented by Savills at this Hearing.

Matter 4 - Green Belt Boundary Alterations

ISSUE: Is the Green Belt Assessment consistent with national planning policy for Green Belts, is it based upon appropriate criteria and is it adequate and robust?

Q.4.1 Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?

2.2. No. As set out in the Green Belt Assessment Review (7th September 2018) prepared by Davies Landscape and submitted in support of Thakeham’s Regulation 19 representations, the Green Belt Assessment (GBA) is flawed and therefore the allocation of a Garden Community at South Godstone is not robust or justified.

2.3. The methodology used in the GBA is only appropriate to identify potential minor amendments to the Green Belt around settlements and existing development. It is not considered the GBA provides a robust or meaningful assessment to understand the sensitivity and effects of the removal of the Green Belt to accommodate large-scale development or a Garden Village required to provide the Objective Housing Need (OHN). This is surprising given the spatial strategy, and approach of TDC to seek a new Garden Settlement(s).

2.4. Volume 3 of the GBA states that any detailed assessment of a new settlement / Garden Community in relation to Green Belt will be considered following the identification of a suitable location and determined through a subsequent AAP. This is not considered a robust approach and appears to have ignored the sensitivity of Green Belt in the evidence process. Whilst it is acknowledged that the potential settlements need to be justified through exceptional circumstances and sustainability credentials, the effects of removing such areas from the Green Belt have not been fundamentally tested. This could have significant effects on several areas of Green Belt protection such as coalescence of Blindley Heath and South Godstone.
2.5. Essentially, the opportunity to robustly assess all Garden Community proposals, based on an intended allocation area has not been undertaken and it is not adequate to simply defer details that have the potential for significant impacts upon the Green Belt to be defined through an Area Action Plan (AAP).

2.6. Furthermore, the current GBA is not considered a suitable evidence base for investigations into potential locations for a new Garden Community as set out in detail in the Davies Landscape Green Belt Assessment Review (7th September 2018). This primary reasons that the GBA is not considered suitable to investigate potential locations for a Garden Community are:

- A lack of clear identification of each parcel’s contribution and sensitivity to each purpose within the descriptions. In most cases the proposed level of contribution was not confirmed against the three categories of contribution set out within paragraph 5.6 of the methodology (clear and obvious contribution, lesser contribution and little or none). The level of contribution is left open for the reader to interpret;

- The large scale of the parcels, would need to be refined to gain a more localised and detailed understanding of the potential subdivisions both in purpose and character, this is especially fundamental in identifying areas that could potentially provide a suitable location for a new settlement;

- A lack of cumulative consideration of how the clusters of parcels perform. This was initially to be illustrated on maps illustrating the level of contribution and areas of weaker/stronger contribution (5.4 of the methodology) however was removed through critical review.

- There is no identification of areas that will need to be protected to retain any positive contribution to the purposes or openness of the Green Belt; and

- Potential mitigation to accommodate development without impacting on the essential characteristics or five purposes of the Green Belt has not been considered.
2.7. All of the above would also provide an initial, albeit high level, consideration of the potential capacity of any identified location as a primary constraint.

2.8. Ultimately, the recommendations of the GBA are considered localised and small scale. As a result the GBA does not adequately consider the comparative effects on the Green Belt of the potential locations for large scale development. Consequently, the strategy proposed through the Local Plan, to develop a new Garden Community at South Godstone is not considered to be justified by the evidence. This is supported by the findings of the Green Belt Assessment Review (7th September 2018), prepared by Davies Landscape and submitted in support of Thakeham’s Regulation 19 representation which concludes “there is no evidence base to illustrate that the Green Belt Assessment has been used to inform the Garden Settlement decision process” (page 2, para 4).

2.9. Due to the lack of consideration of the ability of the Green Belt at South Godstone, to accommodate large scale growth, the proposed broad location (South Godstone) is not considered to be justified. In order for the Plan to be found sound, a robust GBA which fully considers the impacts of large scale development upon the Green Belt at the various potential Garden Community locations within the District, including Redhill Aerodrome should be undertaken. This would ensure that the proposed development strategy to be taken forward is the most appropriate development strategy and is supported by the evidence.

Q.4.2 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?

2.10. Given the extent of Green Belt in TDC, amendments to the Green Belt boundaries are inevitable to accommodate any level of increased growth. Thakeham does not dispute the spatial strategy intention to locate some development around the existing network of Tier 1 and 2 settlements. Thakeham does however question why the opportunity to locate development around those more sustainable Tier 3 settlements has not been taken, for example South Nutfield and Woldingham which both benefit from stations and a range of local services.
2.11. There is also a criticism that the parcels along the boundaries to the west of the District are truncated at the LPA boundary. The Localism Act (2011) sets out the responsibility of local authorities to have a Duty to Cooperate on strategic issues, such as Green Belt. There does not appear to be a consistent approach between the adjoining areas of Green Belt to provide a thorough understanding of potential impacts on the wider policy or of the potential for sustainable patterns of development to be achieved through cross boundary working, particularly where Green Belt release is concerned. As a result, the opportunities to locate sustainable development towards the west of the District, bordering Reigate and Banstead Borough Council (RBBC) have not been sufficiently explored. Thakeham’s comments in relation to the Duty to Cooperate are included in both Thakeham’s and the Tandridge Developers Forum’s (of which Thakeham are a member) Statements for Matter 1.

2.12. The truncation of parcels at the LPA boundary has also resulted in some parcels along the LPA boundaries not having a defensible or physical boundary in line with methodology. This could potentially result in inaccurate representation of the contribution towards the purposes of the Green Belt that some areas at the edge of the District may have.

Q.4.3 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?

2.13. There is no alternative to reviewing the Green Belt as the District is 94% Green Belt. Common to other Districts in the wider metropolitan Green Belt, the circumstances which have triggered the need for a review are well established, for example:

- The heavily constrained nature of the District in Green Belt terms, but relatively unconstrained nature in environmental terms;
- Housing and Economic needs;
- Inability for any surrounding District to accommodate unmet needs;
- The absence of Brownfield land outside of the Green Belt; and
- The huge quantum of Green Belt in the District, not all of which is of a quality which contributes to the defined purposes of the Green Belt.
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2.14. It is however disputed whether the most efficient use of land proposed for release from the Green Belt has been made. The capacity of the South Godstone Broad Allocation to accommodate development has only been considered at a very high level, through the Tandridge District Landscape and Visual Assessment for a Potential Garden Village Location (August 2017, Rev c) (PGVL). Detailed studies to determine the capacity of the site have been deferred to be considered at the AAP stage.

2.15. The PGVL was reviewed by Davies Landscape as part of Thakeham’s Regulation 19 representations (Technical Note – Landscape Capacity, 7th September 2018). The Technical note concludes that “The current PGVL evidence base appears to outline that South Godstone does not have the landscape capacity to deliver the allocated numbers”. In addition, Appendix 8 of Thakeham’s Regulation 19 Representations, provides an assessment of the Capacity of the South Godstone broad location, accounting for landscape constraints. The assessment concludes that an area of just 55ha of the circa 330 hectare broad location is suitable for development.

2.16. This evidence clearly demonstrates that the South Godstone broad location is not capable of delivering the proposed quantum of development. As a result, the proposed strategy to create a new Garden Community at South Godstone is likely to result in the release of an unnecessarily large area of land from the Green Belt in order to deliver the quantum of development required to meet the District’s housing target, and provide the critical mass of development to fund the necessary infrastructure. Consequently the proposed strategy constitutes inefficient use of land proposed for release from the Green Belt.

2.17. The creation of a new Garden Settlement in a less constrained area of the District such as Redhill Aerodrome, which is also previously developed land, would result in a significantly smaller requirement for Green Belt release and would constitute a far more efficient use of land to be released from the Green Belt.
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Q 4.4 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?

2.18. No.

2.19. The evidence suggests that the Green Belt was not addressed first, prior to making decisions on development locations. It appears that TDC has only addressed minor alterations to Green Belt boundaries adjacent to existing Tier 1 and 2 settlements via the evidence base.

2.20. There is no indication about how the differences between Green Belt areas have been compared across the District as being more appropriate / sensitive than others, in Green Belt terms. This is a relevant consideration and should input to the spatial strategy and exceptional circumstances.

2.21. The solution is a robust assessment of the whole District, making Green Belt comparisons first. This provides a robust indication of Green Belt purposes, and also potential sensitivity for development in those locations (which could be ranked low, medium and high for example). Regardless of the chosen spatial strategy, there is incomplete evidence in the Green Belt Assessment to properly inform this and the SA.

Q 4.5 In overall terms, are there exceptional circumstances for the proposed alterations of the boundaries of the Green Belt, to accommodate the level of development proposed?

2.22. Yes, on the basis that TDC is 94% Green Belt. See answer to Q4.3.

2.23. The issue at dispute is the amount of development that can be accommodated within the District and the detail of the assessment required to robustly demonstrate exceptional circumstances. Based on the incomplete assessments to date, there is not the evidence to demonstrate the exceptional circumstances of South Godstone.

Q 4.6 In overall terms, are the proposed boundaries of the Green Belt defined clearly and would they be likely to be permanent or capable of enduring beyond the plan period?

2.24. No.

2.25. It is clear that the incomplete assessment, and inadequate redefinition of the Green Belt, will merely lead to the need to redefine the boundaries again, in any five-year plan review.
2.26. No safeguarded land to be removed from the Green Belt has been identified, and by definition, the future boundaries of the Green Belt at South Godstone have been deferred to another plan (the AAP). The methodology is clearly not robust given the outcome of the proposals map / proposed allocations.

2.27. The current plan does not identify in any detail boundaries that are considered suitable to provide the required level of development within the plan period, particularly to accommodate large scale expansion or Garden Village.

2.28. There is no detailed assessment of the performance of the wider Green Belt away from existing settlement boundaries. The requirement to allocate a new settlement / Garden Community as part of the local plan will require a Green Belt location. The original methodology of the GBA was not designed to investigate this scale of development and therefore does not provide a suitable level of analysis of the sensitivity of the wider Tandridge Green Belt to determine suitable locations for this scale of development.

2.29. The location of the proposed Garden Community has come forward through promotion and not through assessment within the GBA. The GBA is not considered to provide clear or robust information to make Green Belt decisions on these locations for removal or creation of new defensible boundaries.

2.30. In summary, the clear inadequacies of the GBA, as identified throughout this statement are likely to result in a need for further Green Belt release, and therefore the further revision of Green Belt boundaries in the near future. As a result, the Green Belt boundaries proposed are unlikely to be permanent and are not capable of enduring beyond the plan period.
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 Green Belt Assessment, and therefore the distribution of development and local plan as a whole are unjustified and ineffective. Consequently, the local plan is unsound on the basis of incomplete evidence and the overall approach to Green Belt release.

3.2. In order to be found sound, major modification are required. These would need to involve the completion of a new GBA or significant addendum to the existing GBA to consider more specifically the impact of the release of a large area of Green Belt to accommodate a new Garden Community. It is likely that following such a review the location of development will need to be reconsidered, in particular the location of the proposed new Garden Community. Should major modifications not be progressed the Thakeham consider that the Local Plan should be found unsound.