Examination Statement

Land at Redhill Aerodrome

Thakeham Homes

Tandridge District Council – Local Plan 2033

Examination in Public

Matter 6 - South Godstone Garden Community and Housing Allocations
Examination Statement

Contents

1. Introduction 1
2. Response to the Inspectors Questions 2
3. Conclusion 14

Appendices
- Appendix 1 – Inspector’s Post Hearing Letter to Hart District Council (26th February 2019)
- Appendix 2 – Technical Note Prepared by WSP in response to Question 6.7
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 6 and will be represented by Savills at this Hearing.

Matter 6 - South Godstone Garden Community and Housing Allocations

SCG01: South Godstone Garden Community

ISSUE: Is the policy for the allocation of a broad location for a Garden Community at South Godstone justified, effective and consistent with national policy?

2.2. Q.6.1 Is the approach that the specific details of the proposed Garden Community would be determined through an Area Action Plan (APP) effective and is it clearly justified to address these matters in an additional development plan document?

2.3. No.

2.4. The principle of specific details being addressed through an AAP is suitable, however in this case fundamental issues that could delay or stop the South Godstone site from coming forward altogether should have been addressed at this stage but have not been. Such issues include:

- Viability;
- Landscape capacity;
- Land assembly and Compulsory Purchase Orders (CPO)
- Heritage Impacts
- Transport Impacts
- Infrastructure
- Green Belt release / Exceptional Circumstances
2.5. These issues are covered in greater detail in Thakeham’s Regulation 19 representations, Thakeham’s Hearing Statements for Matters 2 (Housing Need) and 4 (Green Belt) and within this statement in relation to Questions 6.5, 6.6 and 6.7.

2.6. Planning legislation clearly allows for the ‘big decisions’ to be made via the Local Plan, including the allocation of key strategic sites. Indeed this is central to Government policy to ensure a deliverable land supply and sound / robust Local Plans. As these fundamental issues remain unaddressed, the identification of South Godstone as the location for a new settlement is unjustified and the approach of TDC to defer key details that affect the deliverability of the site to be considered though an AAP is not considered to be positive planning.

2.7. This is supported by the recent Inspectors Post Hearing Letter into the Hart Local Plan (26th February 2019 – Appendix 1) in which the Inspector found that there were too many uncertainties associated with proposed new settlement in the Murrell Green / Winchfield Area regarding heritage assets, land ownership and viability (Paragraphs 17 – 39). HDC argued that these details were to be determined in a New Settlement Development Plan Document to be produced and adopted at a later date.

2.8. The Inspector in the Hart case raised fundamental concerns with regard to the soundness of the policy due to these uncertainties and questioned whether it was justified as the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence, as per paragraph 182 of the NPPF. Ultimately the Inspector concluded that a significant level of further supporting work would be required for the policy to be found sound.

2.9. The approach of HDC to the identification of a new settlement bears striking similarities to the approach taken by TDC. Given the Inspector’s findings into the Hart local plan, it is clear that the approach of TDC to defer a large amount of fundamental detail regarding South Godstone to be determined at the APP stage is not a justified approach and therefore the plan cannot be considered sound.
Q. 6.2 Was the broad location for the proposed Garden Community selected on a robust basis?

2.10. No.

2.11. The broad location for the proposed Garden Community at South Godstone has not been selected on a robust basis. A number of issues that have not been considered in sufficient detail to justify the identification of South Godstone as the broad location for a new Garden Community have been raised in response to Question 6.1 above. Further concerns in relation to the suitability and consistency of the approach taken to site assessment through the Sustainability Appraisal have also been raised in Thakeham’s Hearing Statements for Matters 1 and 3.

2.12. It is submitted that there are other available sites within the District, in more sustainable, more viable locations which will deliver significantly greater public benefits that are at a more advanced stage, and therefore more likely to deliver units within the plan period than South Godstone and other sites within the wider A22 corridor. The shortcomings in TDC’s approach to identifying South Godstone as the broad location for a new Garden Community as set out in Thakeham’s Regulation 19 representation and Hearing Statements mean that this point has been overlooked.

Q. 6.3 Is the proposed broad location in a suitable location for housing development?

2.13. No.

2.14. The reasons for this are detailed in Thakeham’s representations to the Regulation 19 consultation (Paragraphs 7.1 – 7.20) and have been identified in this Statement in response to Questions 6.1 and 6.3. Ultimately, South Godstone, and other sites along the A22 corridor are not considered to be the most sustainable or appropriate sites for the location of a new settlement. This is due, amongst other things, to the limited public transport links and poor economic appeal of the area when compared to other available locations, such as Redhill Aerodrome, which is situated between the M23 and A23 transport corridors with access to a wide range of high frequency bus and rail services and other suitable links within the Gatwick Diamond area.
Q. 6.4 How was the proposed broad location defined and is the defined extent justified?

2.15. It is not clear how the broad location has been defined. TDC state that the broad location represents an area of search only and will be narrowed down through an AAP. As the broad location defines the area in which the principle of development is established, it is not justified to leave the identification of the final Garden Settlement area to be determined at a later date.

2.16. The extent of the defined area is considered to be too large, this is a direct result of fundamental issues to the delivery of the site being deferred for consideration through the AAP, such as the extent of Green Belt release. As set out previously in this Statement, and Thakeham’s Statement for Matter 4, Thakeham raise serious concerns with the suitability of the chosen broad location and consider that a comprehensive review of the submitted broad locations should be undertaken, with all relevant matters addressed through the plan rather than deferred to a later plan to ensure that the correct location, as justified by the evidence, is taken forward.

Q. 6.5 How has the identification of the proposed broad location taken into account the significance of designated and non-designated historic heritage assets. Where is the evidence that the Council has identified and assessed the particular significance of heritage assets within or outside the defined area of search where their significance may be harmed through development within their settings?

2.17. As set out in Thakeham’s previously submitted Regulation 19 representation (paragraph 7.8) and the accompanying Heritage Representations prepared by CGMS (7th September 2018), the relevant significance of different heritage assets within the South Godstone area has not been taken into account and there is no evidence that TDC has assessed whether their significance may be harmed through development within their settings. This matter has been deferred for consideration through a subsequent Area Action Plan (AAP)
2.18. As established through the Hart Local Plan examination cited previously, it is clear that it is not a justified approach to defer potential heritage impacts for consideration through a later plan. This is particularly true given that heritage assets in the South Godstone area are designated as being of the highest significance by the NPPF. In addition the Heritage Assessment prepared by the Heritage Collective on behalf of TDC identifies that South Godstone would have the greatest impact on heritage assets of all of the potential locations for a new Garden Community.

2.19. To this end a comprehensive assessment of the impact of a new Garden Community at South Godstone, as well as other potential strategic locations should be undertaken prior to the plan being adopted, and the findings of this assessment used to inform the location of the Garden Community to be taken forward through the plan. This may result in the removal of South Godstone as a location for a new Garden Community and the progression of an alternative site which would have less impact upon heritage, such as Redhill Aerodrome.

Q. 6.6 Is there evidence that land within the proposed broad location would not be available for development?

2.20. The land within the proposed broad location at South Godstone is in multiple fragmented ownerships consisting of over 300 separate landowners, as advised in the TDC Housing Topic Paper 2018 (Page 86). As such there are inevitably going to be land assembly issues which could delay or prevent the development of a new Garden Community from coming forward. Given the plans reliance upon the delivery of 1,400 homes at South Godstone within the plan period it is not reasonable to leave such a fundamental delivery issue for consideration at the AAP stage. Rather land ownership and potential land assembly should be investigated prior to the broad location being taken forward to ensure that the plan is justified, effective and positively prepared.

2.21. The sheer number of interested land owners means that a Compulsory Purchase Order (CPO) is likely to be required to assemble all of the land. The CPO process is costly and time consuming and should only be used as a last resort. As part of the CPO process it is necessary to prove that other potentially suitable and available sites, that would not require a CPO, such as Redhill Aerodrome are not suitable. The Tandridge Developers Forum outline in greater details the complexities of the CPO process and the timeframes involved.
Examination Statement

2.22. Given the evidence provided by Thakeham in their Regulation 18 and 19 representations, and Hearing Statements on other Matters, it is clear that Redhill Aerodrome constitutes a suitable and available alternative site for the development of a new Garden Community. In light of this, in order to secure an effective and positively prepared plan, land assembly issues should be resolved prior to the location of the new settlement being determined.

Q. 6.7 Is there sufficient evidence in regard to possible infrastructure requirements to suggest that there is a reasonable prospect that homes could be built at the proposed Garden Community in the Plan period as set out in the Plan’s trajectory? Points to consider include:

- Any necessary improvements to Junction 6 of the M25;
- Any necessary improvements to the A22;
- Any necessary improvements to South Godstone Railway Station;
- Whether the infrastructure requirements have been sufficiently considered and costed so as to inform the high-level viability of the proposal?
- Whether there are any infrastructure requirements which would mean that the site could not be viably developed at the point envisaged?

2.23. No, for the following reasons -

- Lack of progress with improvements to the M25 Junction 6.
- Lack of certainty that improvements required to mitigate traffic impacts on the A22 can be achieved, funded and delivered;
- Lack of detail or certainty regarding necessary improvements to the South Godstone Railway Station and the frequency of rail services;
- Lack of detail relating to the provision of public transport services and other sustainable travel options;
- Lack of masterplanning detail;
The infrastructure costs included in the viability appraisals are lower than that outlined in the IDP 2019;

Lack of detail around the phasing and timing of infrastructure and how funding would be secured.

Further detail regarding the required improvements to the M25, A22 and South Godstone Railway Station is provided in the technical note from WSP which has been appended to this Statement (Appendix B). Viability and the need for masterplanning however is expanded upon below.

Masterplanning detail

As stated in Thakeham’s Regulation 19 representation and set out previously in this Statement it is inappropriate to defer the bulk of the detail around the delivery of the South Godstone Garden Community to a future Area Action Plan (AAP). Amongst other things a high level masterplan that justifies the land needed to deliver the Garden Community and a phasing and delivery plan for when the infrastructure will be delivered should be specified prior to the adoption of the local plan. Without this detail it cannot be concluded with any level of certainty that the scheme is viable. Many of the commercial uses are likely to unviable, at least initially, based on the BNP viability study meaning the timing of their delivery is crucial to understand as it will impact overall scheme viability.

Infrastructure costs

Like its predecessor the most recent viability study produced by GVA again appears to underestimate overall infrastructure costs via its Table at paragraph 4.17. The latest infrastructure costs from the IDP 2019 relevant to the South Godstone Garden Community are shown in Table 2.1 below.

<table>
<thead>
<tr>
<th>CROSS BOUNDARY</th>
<th>Timeframe</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improvement to bus network -A22/East Grinstead</td>
<td>6 – 10/11+</td>
<td>£3,000,000</td>
</tr>
<tr>
<td>Felbridge Junction Improvements A22/A264 (See Felbridge)</td>
<td>1 – 5/ 6 - 10</td>
<td>£10,000,000</td>
</tr>
</tbody>
</table>
## Examination Statement

### DISTRICT WIDE

<table>
<thead>
<tr>
<th>Transport</th>
<th>6 – 10/11+</th>
<th>TBC</th>
</tr>
</thead>
<tbody>
<tr>
<td>A22 – Off Road Cycle Route</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Junction 6 improvements</td>
<td>All</td>
<td>£20,000,000</td>
</tr>
<tr>
<td>A22/A25 improvement</td>
<td>6 – 10/11+</td>
<td>£5,000,000</td>
</tr>
<tr>
<td>A22/Bone Mill Lane Improvement</td>
<td>6 – 10/11+</td>
<td>£2,000,000</td>
</tr>
<tr>
<td>A22/Miles Lane Improvement</td>
<td>6 – 10/11+</td>
<td>£2,000,000</td>
</tr>
<tr>
<td>A22/Ray Lane Improvement</td>
<td>6 – 10/11+</td>
<td>£2,000,000</td>
</tr>
<tr>
<td>A22/Newchapel Road Improvement</td>
<td>6 – 10/11+</td>
<td>£5,000,000</td>
</tr>
</tbody>
</table>

### GARDEN COMMUNITY REQUIREMENTS

<table>
<thead>
<tr>
<th>Transport</th>
<th>6-10/11+</th>
<th>£15,000,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>Godstone Station Improvements to include Park and Ride facility/Transport interchange/mobility impaired access to both platforms, ticket hall and water closets in addition to enhanced rail services serving the station</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Numerous Junction Improvements (See District Wide Requirements)</td>
<td>ALL</td>
<td>See District Wide Requirements</td>
</tr>
<tr>
<td>Potential Spine Road</td>
<td>6 – 10/11+</td>
<td>TBC</td>
</tr>
</tbody>
</table>

### Education

| Land and 6 FE Secondary School with sixth form provision that is designed to allow for seamless expansion in the future should additional requirement arise | 6 – 10/11+ | £30,000,000 |
| Primary Schools – Land and new 2FE Primary School expandable to 3FE to include dedicated nursery and Special Support Centre for children with Special Educational Needs | 6 – 10/11+ | £7,000,000 |
| Primary Schools – Land and new 2FE Primary School expandable to 3FE to include dedicated nursery and Special Support Centre for children with Special Educational Needs | 6 – 10/11+ | £7,000,000 |
| Primary Schools – additional 1FE primary school or equivalent expansion of existing primary school | 6-10/11+ | £3,500,000 |
| Early Years Provision (1X Day Nursery) | 6 – 10/11+ | £800,000 |

### Health

| GP Health and Social Care Hub | 06-10 | £10,000,000 |

### Recreation, Sport and Community Facilities

| 2*3G pitches | 6 – 10/11+ | £2,000,000 |
| Provision of at least 3 public houses | | |
## Examination Statement

<table>
<thead>
<tr>
<th>Category</th>
<th>Details</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>At least 5 Community buildings, Community Centre</strong></td>
<td>6 – 10/11+ TBC</td>
<td></td>
</tr>
<tr>
<td>Religious building</td>
<td>6 – 10/11+ TBC</td>
<td></td>
</tr>
<tr>
<td><strong>Utilities/Broadband</strong></td>
<td>Gas supply infrastructure (Provision of trunk main as opposed to standard connection)</td>
<td>6 – 10/11+ £3,480,000</td>
</tr>
<tr>
<td></td>
<td>Potential connection to Lambs Business Park to provide renewable energy</td>
<td>6 – 10/11+ £2,000,000</td>
</tr>
<tr>
<td></td>
<td>Foul Water trunk connection/upgrade and Upgrade to WwTW</td>
<td>6 – 10/11+ TBC</td>
</tr>
<tr>
<td><strong>Flood Defence</strong></td>
<td>Flood Risk Assessment (and alleviation where required)*</td>
<td>06-10 TBC</td>
</tr>
<tr>
<td><strong>Green Infrastructure</strong></td>
<td>100 Hectares of Strategic Scale Green Infrastructure on a single site comprising natural and semi-natural greenspace in accordance with Natural England ANGST standards</td>
<td>6 – 10/11+ £28,600,000</td>
</tr>
<tr>
<td></td>
<td>Improvements along existing footpaths, Public Rights of Way and Watercourses by the creation of high quality green corridors throughout the broad location, with the aim to improve water quality along Middle Eden/Gibbs Brook/Ray Brook from moderate to “at least” good water quality</td>
<td>6 – 10/11+ £30,000,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td>£188,380,000</td>
</tr>
</tbody>
</table>

*No assumptions have been in relation to alleviation requirements at this time owing to the Masterplanning process having to take place as part of an AAP*.  

### 2.27.  
The above total £188 million, higher than the £172.5 million referenced in the GVA study even after they have included £15 million for the spine road which is not included in the above costs from the IDP 2019. The above also has a number of costs to be confirmed (tbc). A number of these will represent significant additional costs particularly the A22 – Off Road Cycle Route, Foul Water trunk connection/upgrade and Upgrade to WwTW and Flood Risk Assessment (and alleviation where required). In addition, the costs of the CPO which are likely to be considerable are not included in the above table and have not been accounted for.
2.28. The lack of scheme detail and associated infrastructure costs are evident in the asterisked (*) note to the Flood Risk Assessment (and alleviation where required) item in the IDP 2019 which states:

"No assumptions have been in relation to alleviation requirements at this time owing to the Masterplanning process having to take place as part of an AAP".

2.29. We discussed the apparent lack of master planning detail above. Regardless the tbc costs have seemingly been ignored in the viability appraisals which is not appropriate given they will have an impact on scheme viability.

2.30. We would also like to seek clarification as to whether land costs have been included within the infrastructure costs detailed within the IDP 2019. A number of the infrastructure items for example schools, pitches, green infrastructure etc will require significant land to be delivered.

Phasing and timing of infrastructure

2.31. Large and complicated developments such as the proposed South Godstone Garden Community are particularly sensitive to development phasing and the timing of infrastructure. The GVA viability study recognises this at para 4.25:

'We would highlight that the appraisal is likely to be sensitive to the quantum and timing of infrastructure costs and any variations in what we have assumed above could lead to a different appraisal figure and affect the conclusions within this report. We would also reiterate that these costs are at a very high level only at this stage, and that cost advice is sought as the scheme progresses to refine these figures.'

2.32. This statement confirms our view that the whole Garden Community proposition and subsequent viability testing has not been undertaken at the requisite level of detail. In addition to the viability appraisals not being based on a publically available masterplan (at least at a high level as mentioned above) no detailed phasing plan has been included in the GVA viability report. The only detail that has been included regarding the time of infrastructure is (table following para 8.34):
“Infrastructure works mostly weighted to start of the project where the most significant costs are expected to be incurred”.

2.33. This detail should be made available especially given how critical, by GVA’s own admission, these assumptions are in terms of overall viability.

Q. 6.8 When would the proposed Garden Community realistically deliver the first homes? What is the realistic rate of delivery which should be assumed?

2.34. It is not known what TDC’s delivery trajectory for South Godstone is, which raises concerns regarding delivery of units at the broad location. Despite this, it is Thakeham’s view that it is unrealistic to account for any delivery from the South Godstone Garden Community during the plan period. There are a number of factors which will need to be addressed prior to the site being able to begin delivering units. Several of these are very time consuming issues which are unlikely to be resolved within the plan period such as land assembly, noting that there are over 300 land owners within the location and the potential need for a CPO, and the need for online improvement to Junction 6 of the M25 to be agreed and implemented.

2.35. Other locations within the District, such as Redhill Aerodrome which Thakeham control the land interests for and which would require offline improvements to the M23 rather than online improvements to the M25 (as any of the locations along the A22 corridor would) will be able to deliver units at a much earlier date, within the plan period. Therefore the allocation of a suitable alternative location provide greater certainty that the plan will meet the Districts housing targets over the plan period.
Q. 6.9 Given the affordable housing need identified for the HMA, is it effective to leave the definition of a target for affordable housing to the AAP?

2.36. It is not effective to leave the definition of an affordable housing target for the broad location to the AAP. Thakeham have previously raised concerns with the viability of the location in the Regulation 19 representations, the accompanying Viability and Employment Needs Considerations Report (September 2018) and their Statement for Matter 2. The viability concerns at South Godstone are likely to manifest themselves in a reduction in affordable housing provision. Should South Godstone remain the broad location or a new Garden Settlement, which Thakeham contest it should not, the affordable housing target should be defined through the local plan, to ensure that the affordable housing need in the HMA is addressed.

Q. 6.10 Are the proposed Modifications necessary for soundness?

2.37. For the reasons set out previously in this statement as well as the Statement submitted by Thakeham in relation to other Matters, the proposed modifications are not considered sufficient to make the plan sound. A host of other major modifications to those proposed would be required to make the plan sound, including a comprehensive review of the broad location or the new Garden Community, and the potential allocation of an alternative broad location in a more sustainable location, such as Redhill Aerodrome.
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 raise concerns with the identification of South Godstone as the broad location for a new Garden Community. A number of issues, fundamental to whether South Godstone is deliverable have been deferred to be considered through the AAP, this is not a justified approach and is not considered to be positive planning as it provides no certainty that the site can come forward within the plan period.

3.2. In order to address this major modifications are required, including a comprehensive review of the alternative broad locations. This comprehensive review should include an assessment of all of the relevant criteria that may affect the ability of the locations to deliver a Garden Community, including viability, sustainability, Green Belt release / exceptional circumstances, land ownership, heritage impacts and landscape impacts. This would ensure that the most appropriate site is taken forward in accordance with paragraph 182 of the NPPF. Should major modification not be proposed then Thakeham consider the local plan to be unsound.
Appendix 1 – Inspector's Post Hearing Letter to Hart District Council (26th February 2019)
Appendix 2 – Technical Note prepared by WSP in response to question 6.7