Examination Statement on behalf of Godstone Parish Council

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?

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?

**No.** The proposed Garden Community is a key element of the Council's spatial strategy (MD1 & SPS1), but the Council relies on an AAP to determine the quantum and specific details. This is not an effective way to proceed and flies in the face of National Planning Practice Guidance paragraph: 010 Reference ID: 12-010-20140306 that says:

*Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).*

Whilst it is usual for an AAP to focus in detail on a specific location or area, that is usually on the basis that the Local Plan will have set the key parameters for any development. The use of an AAP in this case would bypass that and leave uncertainty as to how this cornerstone policy would be delivered and, importantly, what and how it is to be delivered.

There is a paucity of information about what exactly is the ‘what’; when precisely is the ‘when’ and very importantly ‘how’ will the infrastructure such as the diversion of the A22, upgrading of rail facilities, employment and retail services and community and education facilities be delivered. It should be for the Local Plan to answer those questions rather than leave this ‘key element’ of the District Council’s strategy to chance in a forthcoming
AAP. The vision and principles underpinning a future AAP are no more than an incomplete wish list.

The SGGC would need to satisfy the three dimensions to sustainable development. The Local Plan should set the context and be clear where a GC or expanded settlement would fulfil (inter alia):

- **the economic role** – of contributing to building a strong, responsive and competitive economy and by identifying and coordinating development requirements, including the provision of infrastructure;
- **the social role** – of supporting strong, vibrant and healthy communities, by providing the supply of housing with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and
- **the environmental role** – of contributing to protecting and enhancing the natural, built and historic environment; helping to improve biodiversity, and use natural resources prudently.

These important dimensions are key to any new or expanded settlement concept and a district wide planning strategy. They should be enshrined in the Local Plan and not left to an ill-defined subordinate plan.

An AAP is contemplated, but the Examination will have to determine whether the proposals are justified and deliverable as part of a district wide strategy. This is particularly important given the scale and long-term nature of the SGGC, as well as their centrality to the entire plan strategy. If the proposals are unsound, as Godstone PC argues, then the plan should be withdrawn to enable the strategy to be reconsidered. Leaving the detail of the proposed GC to the AAP creates uncertainty as to the spatial strategy at the heart of the Local Plan. Whilst the PC considers the SGGC to be completely unjustified, were the Examination to find in its favour the policy proposal requires very substantial clarification as to what the SGGC is expected to deliver especially what, when, where and how.

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6.2 Was the broad location for the proposed Garden Community selected on a robust basis?

**No.** In November 2015 the potential scenario of building a large urban extension or new settlement was scenario 6 of the Infrastructure Delivery Baseline Plan: Part 2 (INF26). Footnote 5 in relation to scenario 6 explained that the original approach to Service Providers specifically asked them to consider South Godstone. Subsequently Service Providers were asked to consider other appropriate settlements to accommodate an urban
extension or new settlement. No actual settlements or sites were suggested. It is therefore informative to note that Surrey County Council’s response on Page 30 of INF27 was in response of ‘a large urban extension of 4,000 homes in South Godstone’ only.

The Surrey County Council response supports the PCs view that the Council’s scenario for SGGC was the only option it was looking at on November 2015 and clearly pre-date the Local Plan Consultation in 2016 (SPS3). The PC’s Examination Statement on Matter 2, the Sustainability Appraisal questions 1.2 – 1.4 sets out the reasons why the PC considers the SA was flawed and the choice of the South Godstone location wrong. Crucial to understanding the PC’s position is that the SA:

- Did not robustly and transparently explain the reasons why South Godstone was chosen
- Did not explain why other alternatives were rejected
- Used an analysis that was somewhat crude and partial with a notable omission of any weighting.
- Failed to assess the extent to which the possible alternative sites would help to achieve relevant environmental, economic and social objectives

As a result, the early preference and choice of South Godstone for a GC exerted a wrongful influence on the preparation of the Local Plan and infected the remainder of the process. The selection of South Godstone was not part of an inclusive and robust analysis and neither does GB1 provide an adequate exceptional circumstances case.

It is apparent that many consultation responses share the Parish Council’s concerns about the lack of transparency and objectivity in the selection of South Godstone for a Garden Village. The process of choosing Garden Villages as part of the spatial strategy started with twenty-four broad locations considered for the provision of a new settlement. From those, ten were considered in more detail. Seven of these were discounted for reasons set out on page 223 of the Sustainability Appraisal July 2018 (SSHA3). The remaining three broad locations were then assessed before South Godstone was seemingly selected as the preferred site.

INF26 gives a very clear picture of the Council’s intention to allocate land at SG for the SGGC and arguably that was going to be a fait accompli and outcome of the consultation as the District Council had predetermined the result. There has been considerable local objection to the SGGC and there remains substantial concern that the decision to propose
SGGC was taken in a manner which was not iterative, but which wrongly influenced any further consideration of the strategy.

The above suggests that proper weighing up of the available options for development did not take place and the Council did not abide by the requirement of the duty to cooperate with the local communities. The possibility of working in cooperation with Reigate and Banstead and building on the Tandridge side of the Redhill Aerodrome was rejected for unclear reasons in favour of this arguably predetermined plan to build at South Godstone.

In the face of the apparent acceptance of the SGGC the case for its choice has never been made. There is no robust, transparent case for its inclusion in the Local Plan. The SA (MD4 – 7 and earlier iterations) and other evidence documents are confusing and are difficult to understand. The full picture as to the capacity of each of the alternative sites; why some were discounted and why others were chosen is missing. Without details relating to how the capacities of sites were calculated, it is difficult to be satisfied that the process was robust and transparent.

The SGGC has not been justified by a full and proper Sustainability Appraisal that explored and compared all the possible development options to settle on the broad location chosen.

The rejection of urban extensions in the north and west of the district as an alternative to a new settlement was ill-founded and has not been justified. As to collaborating with another authority over another site that could have led to an alternative preferable site or broad location coming forward but was not meaningfully investigated. The choice and promotion of SGGC is based on the flimsiest of comparative analysis. It also flies in the face of a potential collaborative development that might provide greater economies of scale and choice in infrastructure, services and community facilities.

The Council has, it appears, been led by assessing ‘stand-alone’ development options which mirrored developer submissions. It then linked two submissions (one north of the railway and the other south of the railway) to come up with the area of search. As such the Council has limited its opportunity in identifying alternatives and potentially the most appropriate development solution within this general geographical area having regard to both national and local constraints and opportunities for jobs near homes. There are existing and developing major economic centres close to the north and west borders of Tandridge. They include the comprehensive regeneration of Croydon with a significant
amount of new office and retail space; the business parks at Horley, Manor Royal Crawley, Horsham and Burgess Hill which form central planks of the Gatwick Diamond initiative; Gatwick; the Redhill Area Action Plan; the creation of the “London cancer hub” in Sutton in a campus-style life science treatment and research centre. Consideration has not been given to a strategy of building homes in Tandridge close to these economic centres.

In the absence of a robust SA that fairly predicts and evaluates the effects of the preferred approach and the reasonable alternatives there is no clear identification of the significant positive and negative effects of each alternative. The fundamental approach of an SA to be carried out as a systematic process and assess the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives has been ignored. As a result, it cannot be seen or understood why the approach in Chapter 33 is chosen. Indeed, there is very little in the evidence base documents that made out the case for a GC to be better than urban expansions at the north and west perimeter of the District or for SGGC to be better than the other three sites that were considered.

Further, there is no sound evidence that the broad location was chosen on the basis of a robust assessment of the sustainability of its location given issues including travel to work patterns (addressed in representations on other Matters), or of how development of this scale could be supported by adequate and deliverable infrastructure. The PC understands that the Council intends to seek borrowing of £200m to assist with bringing forward the SGGC. There is no evidence of any partnership agreement between the Council and landowners/developers and no clear picture as to what the necessary supporting infrastructure required is, or exactly how it is going to be delivered, or how it will be funded. **INF2 Financial Viability Assessment of SGGC** is of little assistance as to how and when the SGGC would be delivered.

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

**No.** The SGGC, in the Council’s own words, is a complex matter to be addressed in the context of whether, when judged against the reasonable alternatives, it is a suitable location for housing to achieve the relevant environmental, economic and social objectives. Chapter 33 purports to set out a key element of the spatial strategy on the basis that the decision to locate a GC at South Godstone has been ‘evidence led’. For the reasons already explained in the representations in respect of the SA (Examination matter
1) the evidence base is unsound and the provenance for the decision for the broad location at South Godstone is at best opaque.

A suitable location for housing must be one where the three principles of sustainable development in the Framework are met. If they are only capable of being met because other essential economic and social development is needed that points to the site being an unsustainable location to start with. In which case dropping 4,000 homes in such a location must be accompanied by surety that all the dimensions of sustainable development will be met.

In circumstances where the chosen strategy involves proposing substantial strategic housing development away from much larger established settlements it is necessary for the sustainability and deliverability of that development, as the most appropriate strategy, to be substantiated. For reasons already explained under other matters before the Examination, the rationale for choosing South Godstone for a GC has not been properly evidenced as a location for 4,000 homes/10,000 residents. Neither have the infrastructure requirements been fully identified. These concerns include the significant absence of any cogent evidence to substantiate the viability and deliverability of this significant new development in the Green Belt, both in principle and as a preferable alternative to other locations and in the absence of an exceptional circumstances case. Without those issues being resolved and properly planned for, it is clear that South Godstone is not a suitable location for 4,000 new homes.

The broad location for 4,000 homes is in an area with very little by way employment, service or community services capable of serving an additional 10,000 residents. All essential service and community facilities would need to be provided. Without those and with no employment provision for the new residents, the GC would be a dormitory settlement.

Significant areas of the broad location are shown on the Environment Agency’s flood risk maps as being within flood risk zones 2 and 3 (WTR13) and the site includes high and medium risk surface water flood areas and other areas at low risk. The latter could be raised in risk level by built development and call in to question whether the broad location is suitable for housing. The recommendations for Local Plan policy in the Level 2 SFRA for Potential Garden Communities Summary tables (WTR6), supported by mapping (WTR11–13), are generalised comments exactly the same for all three sites at Blindley.
Heath, Redhill Aerodrome and South Godstone and provide some guidance but little substance about potential impact of a GC and how to overcome flood risk issues.

6.4 How was the proposed broad location defined and is the defined extent justified?

The broad location appears to have been defined as being land that two landowner/developer interests put forward as potential sites to extend the settlement of South Godstone that was then combined by the Council into a Garden Village/Garden Community location. There is no other explanation and little by way of robust and transparent analysis as to why this became a preferred location (as explained in the PC’s Examination Statements on matters 2 and 3).

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 outwith the defined area of search where their significance may be harmed through development within their settings?

The principal heritage interests are at Lagham Park - grade II* and II listed buildings and scheduled ancient monument and Park Pales (unregistered heritage asset).

The SA (MD5) at page 229 blithely notes that the former could be impacted and potentially mitigated and the later needs to be factored into any development. No consideration appears to have been given to the potential significance of the wider area beyond the scheduled ancient monument which Taylor Wimpey, amongst other representors, argue is of heritage importance. There appears to be no other evidence about the particular significance of those heritage assets having been assessed and no evidence that the planning authority has properly assessed the particular significance of the heritage assets affected by development (Framework paragraphs 129, 132 – 134).

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

Yes. The Council and local community are aware that landownership of the broad location is complicated by a central portion of the site resting with some 348 owners domiciled across the world. Assembling that land and adding it to the land owned by others will be a complex process which the Council appears likely to require compulsory purchase to obtain. The intent by the Council to borrow £200 million in order to develop is no more
than an aim to borrow funds and lenders would need to be satisfied that the project was viable to release such a sum into the Council’s hands. The Council has provided no evidence to assure the community that such a sum would be provided to it.

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?

**No** – the PC are unaware of any evidence as to the land availability for, timing, funding and deliverability of the infrastructure requirements. All other those issues go to the heart of the proposed allocation of the SGGC site and should have been addressed in Local Plan Chapter 33 should have addressed.

This glaring omission from the vision for South Godstone is a very serious concern to the PC and local community as well as the travelling public as without those issues and infrastructure requirements being met the vision and principles underpinning the SGGC cannot be met and the list of infrastructure projects is no more than a wish list with scant change of being delivered.

In so far as the position with rail services from Godstone are concerned, the Council has wrongly relied on the availability of Godstone station and its rail service to support the SGGC.

By way of context, the passenger train services are currently operated by GTR (Govia Thameslink Railway). The line runs from Redhill to Tonbridge. GTR use Class 377 Electrostar rolling stock which are predominately 4 car units although it should be noted that very occasionally 8 car units are also used. The line has seen a gradual but steady decline in both reliability and availability of services over the last 20 years. Following the removal of direct services to London last year, the train paths north of Redhill previously occupied by those services, have been swallowed up by the more commercially viable main line services running from Brighton, Horsham and Reigate.
There is no evidence that either GTR is satisfied that there is a commercial case for improving the service on this route (or for re-introducing direct services to London); and the PC is not aware of Network Rail making provision either within their current or future financial control periods for any meaningful infrastructure upgrades on this line. There are no planned infrastructure improvements referred to in their Route Development Strategy which addresses their current Control Period 6 (to 2023) and 7 (to 2027).

The table below shows the footfall figures issued by the ORR (Office of Rail and Road) for most stations, irrespective of their line of route, within a 12 mile radius of the proposed garden village site. Figures for 2016-17 and 2017-18 are shown. It can be seen that in the year 2017/18 a total of 484,414 passengers used the 5 stations between Tonbridge and Redhill. This is the equivalent of 663 a day. A four carriage 377 Electrostar has a total capacity for 393 passengers so it can be seen that of the 64 trains that are programmed to run on this route each weekday, there are less than 2 full train's worth of passengers. Even with a garden village at South Godstone, these figures will not come anywhere near to generating a sufficiently robust business case for either service or infrastructure improvements. It should also be remembered that of the 663 passengers using these services on average each day, a high proportion will be schoolchildren accessing the schools at Tonbridge (travelling on heavily discounted fares thus further eroding any business case for the line).

The very low footfall figures shown in the table at Appendix 1 for stations on the Tonbridge to Redhill line are primarily a result of passengers wishing to access a fast, reliable service elsewhere. The footfall levels for the five stations on this route are simply commercially unsustainable against the 64 trains that are scheduled to run daily and with a new commercial emphasis being brought to the future rail franchising model, the line may well struggle to survive let alone have its services expanded.

The majority of car parks operating in this area including those at Oxted and Lingfield operate at full capacity most weekdays. Interestingly, Godstone station which has a small car park and is free always has spaces available further demonstrating that passengers are not interested in using this rail service.
The unavoidable result demonstrated by these figures is that large numbers of commuters are already traveling in their cars to access railway stations away from their homes and construction of a garden village in South Godstone will further exacerbate this unsustainable situation.

The line between Tonbridge and Redhill now operates as little more than a shuttle service is in terminal decline. The exceptionally low levels of patronage mean that hard fought for funding will be targeted by Network Rail and future train operators at other key routes in the south east in order to protect investment that has already been made. In short, the necessary improvements in rail services and station facilities is no more than wishful thinking. Godstone station will not be capable of generating a sufficiently attractive train service to London. The result will be that the SGGC would exacerbate unsustainable patterns of transport, undermining the justification for this strategic allocation.

That then leaves the issue of the M25 junction 6 re-modelling and the necessary improvements to the A22. The details of the works, financing and programming is sketchy. There is nothing in Highways England road programme about M25 junction 6 and no details in SCC’s Transport Plan. INF2 makes it clear that these two vital items of infrastructure will be funded through Section 106 contributions and private and public sector investment. But there is no evidence that these two projects and the relief spine road will be available before the first homes are built at the proposed Garden Community in the Plan period.

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

The Local Plan envisages that some 1,400 new homes will be delivered by 2033. In the 14 years until then, and assuming the proposed GC forms part of an adopted Local Plan it will have been necessary to have been through the following (not necessarily in the order listed):

- Identification of land ownerships and acquisition discussions
- Compulsory purchase of the 348 plots (potential Public Inquiry)
- Working up a masterplan
- Identification and signing up a development partner or partners
- Agreement on infrastructure for services, transport, education, health etc
- Production, Examination and Adoption of an AAP
- Site assembly and purchase
- Land sale to partner/developers,
- Planning applications and permissions
- Site preparation and attenuation measures
- Essential infrastructure pre commencement works
- The Local Plan (page 4 MD1) indicates that it could take 6 to 10 years to plan and formulate a policy for the GC. If that took ten years before construction of new dwellings could commence then the annual rate of build would have to be 350 dpa to achieve the figure of 1,400 new homes by 2033. That may not be attractive to the housebuilding market.

The Council's answer to these two questions is awaited and may be the subject of comment at the Examination.

<table>
<thead>
<tr>
<th>6.9</th>
<th>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?</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>Affordable housing provision in the District is too significant an issue to be left undetermined in this way. It is important that a central feature of the Plan sets out the strategy for affordable housing delivery at this stage rather than allowing this to be left over. The development plan would otherwise have approved the principle of substantial housing provision in this location without any proper understanding of the affordable component of this substantial level of provision. The Local Plan should set a target level or percentage that the development should aim to deliver.</td>
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<thead>
<tr>
<th>6.10</th>
<th>Are the proposed Modifications necessary for soundness?</th>
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<tbody>
<tr>
<td>No comment</td>
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Appendix 1

Railway station footfall

<table>
<thead>
<tr>
<th>Station</th>
<th>Population</th>
<th>2016/17 Footfall</th>
<th>2017/18 Footfall</th>
<th>Ratio of Population</th>
<th>Direct Services</th>
<th>Journey Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nutfield</td>
<td>2,673</td>
<td>78,296 (107)</td>
<td>84,096 (115)</td>
<td>1 : 4.3</td>
<td>No</td>
<td>59 mins</td>
</tr>
<tr>
<td>Godstone</td>
<td>5,949</td>
<td>58,346 (79)</td>
<td>66,190 (91)</td>
<td>1 : 1.5</td>
<td>No</td>
<td>65 mins</td>
</tr>
<tr>
<td>Edenbridge</td>
<td>8,907</td>
<td>241,344 (331)</td>
<td>257,530 (353)</td>
<td>1 : 3.9</td>
<td>No</td>
<td>71 mins</td>
</tr>
<tr>
<td>Penshurst</td>
<td>1,628</td>
<td>31,894 (43)</td>
<td>34,854 (48)</td>
<td>1 : 2.9</td>
<td>No</td>
<td>78 mins</td>
</tr>
<tr>
<td>Leigh</td>
<td>1,793</td>
<td>44,358 (61)</td>
<td>41,744 (57)</td>
<td>1 : 3.2</td>
<td>No</td>
<td>82 mins</td>
</tr>
<tr>
<td>East Grinstead</td>
<td>26,383</td>
<td>1,437,882 (1,969)</td>
<td>1,514,562 (2,074)</td>
<td>1 : 7.9</td>
<td>Yes</td>
<td>55 mins</td>
</tr>
<tr>
<td>Dormans</td>
<td>1,931</td>
<td>111,430 (153)</td>
<td>111,060 (152)</td>
<td>1 : 7.9</td>
<td>Yes</td>
<td>49 mins</td>
</tr>
<tr>
<td>Lingfield</td>
<td>4,467</td>
<td>573,218 (785)</td>
<td>546,656 (749)</td>
<td>1 : 16.8</td>
<td>Yes</td>
<td>48 mins</td>
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<tr>
<td>Oxted</td>
<td>11,314</td>
<td>1,533,336 (2,100)</td>
<td>1,571,614 (2,152)</td>
<td>1 : 19.1</td>
<td>Yes</td>
<td>38 mins</td>
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<tr>
<td>Woldingham</td>
<td>2,141</td>
<td>289,339 (396)</td>
<td>306,498 (420)</td>
<td>1 : 19.6</td>
<td>Yes</td>
<td>39 mins</td>
</tr>
<tr>
<td>Edenbridge Town</td>
<td>8,907</td>
<td>253,354 (347)</td>
<td>270,344 (370)</td>
<td>1 : 4.1</td>
<td>Yes</td>
<td>55 mins</td>
</tr>
</tbody>
</table>

Notes:

Population: Figures provided from 2011 Government census (Godstone includes South Godstone)

Footfall 2016/17: Annual and daily passenger numbers for the year 2016/17 provided by the ORR.

Footfall 2017/18: Annual and daily passenger numbers for the year 2017/18 provided by the ORR.

Ratio of Population: Ratio of daily passengers against population.

Direct Services: Whether station has a direct line service to London (no changes)

Journey Time: Average peak journey time to London Bridge (incl changes). In the case of Redhill to Tonbridge line stations, journey times are all via Redhill.