Examination Statement

Land at Redhill Aerodrome

Thakeham Homes

Tandridge District Council – Local Plan 2033

Examination in Public

Matter 7 – Employment Land Allocations
### Contents

1. Introduction ........................................ 1
2. Response to the Inspectors Questions .......... 2
3. Conclusion ............................................ 6
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 7 and will be represented by Savills at this Hearing.

Matter 7 - Employment Land Allocations

ISSUE: Are the proposed employment land allocations justified, effective and consistent with national policy?

SES03: Lambs Business Park, South Godstone

Q.7.9 What are the exceptional circumstances for the release of the site from the Green Belt?

2.2. TDC has set out the exceptional circumstances that it considers support the release of Lambs Business Park from the Green Belt in Appendix 1 2018 to the Green Belt Assessment, Part 3. Lambs Business Park is identified as ENA12 within the document and is assessed on pages 210 – 213.

2.3. The exceptional circumstances that TDC consider justify the release of the site from the Green Belt are largely based on the benefits that TDC associate with increased / improved employment provision at the site.

The GBA concludes on page 213 that:

“The site promoter is proposing a Greener Technology Park and its proposed development represents a significant opportunity for higher-value, higher-density and higher-skilled based employment provision, inward as well as spin-off investment, whilst increasing access to jobs for local residents. The intensification of this site in line with recommendations of the evidence based would make a major contribution to meeting employment needs over the plan period and achieving the Council’s economic development operations”.
2.4. Thakeham however have serious concerns about the viability of Lamb’s Business Park and its ability to provide additional employment space. Paragraphs 4.4.3 and 4.4.4 of the Viability and Employment Need Consideration Report (VENC R) (September 2018) submitted in support of Thakeham’s Regulation 19 representation identify that:

“The high level viability testing undertaken for the Lambs Business Park in the [Tandridge Draft Local Plan] Viability Assessment [page 109] concluded that new development here was unviable with a Residual Land Value of £443,591 compared to a Benchmark Land Value of £2,752,800. It should be noted this is based on headline rents for the Tandridge area rather than what is achievable in South Godstone meaning the viability position could be even worse.

Given the Tandridge Economic Needs Assessment’s concludes that Tandridge is not a strong employment area and the Viability Assessment’s conclusion that commercial development has limited viability, even at headline rents, it’s questionable as to why new and better located sites such as the proposed M23 business park within the Redhill Garden Community have not been seriously considered in the Local Plan and supporting evidence base”.

2.5. In summary, Lambs Business Park is considered an unviable employment site for the following reasons.

- It is poorly located on the A22 corridor outside of the ‘Gatwick Diamond’ which is the employment powerhouse of the District, and therefore represents the most suitable location for development. Employment development at Lambs Business Park would be isolated and unattractive to investors; and

- It offers low rent levels, which are unattractive to commercial investors and do not justify build costs of new premises (VENC R para. 4.3.5), particularly when higher skilled jobs are concerned.
2.6. Furthermore, the ability of the site to attract interest and therefore investment for a Greener Technology Park and associated higher-skilled jobs is also questioned. The suggestion of a Greener Technology Park at Lambs Business Park appears to be just that, a suggestion, with no evidence to demonstrate that there is demand for such a development in South Godstone or to demonstrate that such a use would be deliverable, especially considering that TDC’s own evidence concludes that Tandridge is not a strong employment location and that redevelopment of Lambs Business Park is unviable (Tandridge Draft Local Plan: Viability Assessment – Appendix 7 – Appraisal Summaries page 109 ENA12 Lambs Business Park, Godstone). As explained previously in this Statement, Thakeham’s evidence contained in the VENCR (September 2018) also concludes that the site is not viable.

2.7. The assertions as to the ability of Lambs Business Park to support the anticipated employment growth are not supported by evidence, indeed, the evidence produced by both Thakeham (VENCR September 2018) and TDC (Tandridge Draft Local Plan: Viability Assessment) demonstrates that Lambs Business Park cannot support the anticipated employment growth. The provision of employment growth, and higher skilled jobs at the site forms the basis of the exceptional circumstances that TDC consider justify the release of the site from the Green Belt. Consequently, it is not considered that the release of the site from the Green Belt is supported by robust or justified exceptional circumstances and therefore the provision of employment land should be reconsidered, with a view to allocating provision at a more suitable, viable site, such as Redhill Aerodrome.
Q.7.12 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework, and are they justified?

2.8. The financial requirements set out under Infrastructure related to the Lamb’s Business Park are “A22/ Tilsburstow Hill Road improvements, on reflection of up to date transport assessment and relative to the size, type and nature of the scheme proposed”.

2.9. Given the unviable nature of development at the site, as set out previously in this Statement, it is considered unlikely that development at the site could support improvements to the A22 / Tilsburstow Hill Road. Paragraph 204 of the NPPF (2012) sets out three tests that planning obligations must meet, these are:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

2.10. As proposed obligations have been included in the policy it is implied that TDC consider them necessary to make the development of the site acceptable in planning terms, or the obligations would fail the para 204 tests. Both Thakeham and TDC consider the site unviable and therefore the development of the site will be unable to fund and deliver the necessary improvements to make the development of the site acceptable. As a consequence, it is clear that the site cannot be delivered. In light of these concerns, which remain unaddressed, Thakeham do not consider the proposed allocation of Lambs Business Park to be supported by the evidence or justified.
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, question the suitability of and the justification for the allocation of Lambs Business Park as an employment site.

3.2. As set out in the VENCRI which supported Thakeham’s Regulation 19 representation, there are serious concerns regarding the location of the site and the low rental values for employment space in the locality. These lead to further concerns as to whether the site will be able to attract the commercial investment required in order to deliver the proposed development, this is especially true when the requirement for improvements to the A22 / Tilburstow Hill Road are factored in.

3.3. In summary, Thakeham do not consider the Lambs Business Park allocation to be viable. The allocation is not supported by the evidence and is unjustified. In order for the plan to be found sound the Lambs Business Park employment allocation should be removed and replaced with a more viable allocation that is justified by the evidence, such as Redhill Aerodrome.