

Keep Redhill Airfield Green

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TANDRIDGE LOCAL PLAN

GARDEN VILLAGE CONSULTATION RESPONSE 9th October 2017

KRAG OPINION ON REDHILL AERODROME

MAIN REPORT & APPENDIX 1 Local Roads Photographs

Keep Redhill Airfield Green

TDC GARDEN VILLAGE CONSULTATION - REDHILL AERODROME

GARDEN VILLAGE CONSULTATION RESPONSE

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KRAG

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KRAG Garden Village Consultation Submission

Executive Summary

For ease of reference and because this is a lengthy document we provide our conclusions to the proposal to build a Garden Village at the site of Redhill Aerodrome at the front of our submission.

All conclusions are explained and validated within the relevant sections.

REASONS TO REJECT REDHILL AERODROME AS A LOCATION FOR A NEW TANDRIDGE GARDEN VILLAGE.

ISSUE 1: Is Redhill Aerodrome (RA) is being considered prior to basic land categorisation being assessed?

ISSUE 2: Developers Thakeham Homes have not submitted any credible evidence to support their speculative proposals.

ISSUE 3: Has the negative economic impact of the loss of the existing jobs at RA been assessed?

ISSUE 4: Development at RA will have a negative impact on the existing Green Belt and not promote Sustainable Development.

ISSUE 5: Selection of a cross border site will complicate and potentially delay delivery.

ISSUE 6: The new development must not have a negative impact on existing communities.

ISSUE 7: RA cannot achieve the planned Local Plan timetable.

ISSUE 8: How “Affordable” will the houses built at RA be if they have to reflect the high cost of the infrastructure required to facilitate the development?

ISSUE 9: Development at RA is unlikely to provide Affordable Housing in significant numbers within the Plan period.

ISSUE 10: The build out rate should be significantly improved to benefit purchasers.

ISSUE 11: Development at RA would be car mode orientated. This does not comply with the NPPF regarding the promotion of Sustainable Transport and the choice of how to travel.

ISSUE 12: Development at RA would conflict with the existing TDC Core Strategy to reduce projected carbon emissions and to minimise the impact on climate change.

ISSUE 13: Development at RA will exacerbate local road congestion.

ISSUE 14: RA is not a sustainable location for the type of development and its promotion as a Garden Village is not supported by the NPPF.

ISSUE 15: Development at RA is likely to exacerbate local air pollution.

ISSUE 16: The new motorway link may increase traffic congestion at Gatwick Airport.

ISSUE 16: Thakeham have publicly stated that development at RA is not feasible without a new M23 junction.

ISSUE 17: Discussions with Highways England are only at a very preliminary stage.

ISSUE 18: The 5 year delay on additional work on the M23 will further retard the delivery of any new junction should it ever be permitted by Highways England.

ISSUE 19: The proposed development may not be big enough to be considered by Highways England to be viable.

ISSUE 20: The provision of a dedicated M23 motorway link to the proposed development is pure conjecture. It cannot be relied on as credible at this fledgling stage. TDC would be ill advised to select RA as their preferred option on this basis.

ISSUE 21: A new link to the M23 to serve the RA development will bring no benefit to the majority of TDC residents.

ISSUE 22: RA, by design, will never be linked to Rail Network. This will result in a car dependant development which is contrary to NPPF guidelines.

ISSUE 23: Provision of the required infrastructure by the developer will increase the average house price. Impacting affordability.

ISSUE 24: If TDC select RA as their preferred option they will be contributing to increased property prices in their district.

ISSUE 25: The RA site includes land within Tandridge that falls within Flood Zones 3A and 3B. These areas are considered to be of high risk of flooding.

ISSUE 26: Environment Agency advice is that Local Planning Authorities should steer development to areas of lowest flood risk, requiring them to establish that there are no reasonably available

development sites within the areas of lowest flood risk before considering development in areas of higher flood risk.

ISSUE 27: No Strategic Flood Assessment has been made on a site known to be partially categorised in Flood Zone 3.

ISSUE 28: No Sequential Test has been undertaken at RA, a site known to be partially categorised in Flood Zone 3. Exceptional circumstances have not been demonstrated.

ISSUE 29: Is TDC confident that it has adopted an acceptable approach when reviewing its Green Belt land and in particular Redhill Aerodrome?

ISSUE 30: TDC must establish a brownfield register prior to undertaking any Green Belt review. This has not happened.

ISSUE 31: Development at RA would contradict the principles laid out in this White Paper regarding timescales.

ISSUE 32: Development at RA would contradict the principles laid out in this White Paper as Thakeham Homes have no track record of building a development of even 10% of the size of the proposal.

ISSUE 33: Development at RA would contradict the principles laid out in this White Paper as the land is not close to an existing transport hub.

ISSUE 34: On its own, the suitability of any site for housing is unlikely to constitute an exceptional circumstance.

ISSUE 35: Is TDC policy to surrender an area of its Green Belt to accommodate other Local Authority housing requirements?

ISSUE 36: If this is so when was this policy agreed?

ISSUE 37: RA already makes a significant contribution to the local economy which will be lost if this development is permitted.

ISSUE 38: None of the other 3 sites under consideration provides such a positive contribution to the existing TDC economy.

ISSUE 39: There are 450 existing jobs at RA that will be lost if this proposal was permitted. 70% of current employees live locally.

ISSUE 40: Any new jobs would not be provide within a time frame that would benefit any of the existing employees. This should be a material consideration.

ISSUE 41: Development at RA should not be considered a viable option without agreement from Highways England to facilitate the dedicated M23 link road.

ISSUE 42: No proper assessment of the inherent financial risks can be made as there are too many unknown factors.

ISSUE 43: The extended timeline that applies to the delivery of this proposal significantly increases the financial risks.

ISSUE 44: The high cost of essential infrastructure provision could compromise a developer making a competitive return which is contrary to NPPF guidance.

ISSUE 45: This could result in the reduction to any non-profit making aspects of the development.

ISSUE 46: The network of GA aerodromes around the UK and the connectivity provided should be seen as a national asset, providing economic benefits to the country as a whole.

ISSUE 47: Development at RA will require the closure of the existing aviation related activity. This will result in the cessation of the last fixed wing Aerodrome in Surrey.

ISSUE 48: RA provides an important diversion facility for other GA Users.

ISSUE 49: RA offers training to student pilots that may not be available elsewhere within a reasonable distance.

ISSUE 50: Both of these vital emergency services could be lost at this location. This is a significant concern for local residents.

ISSUE 51: In 2014 an independent Planning Inspector wrote: *"Development should respond to local character and history and reinforce local distinctiveness."* The building of 8000 houses at RA would not achieve this.

ISSUE 52: The Inspector also designated the landscape at RA as: *Landscape sensitivity has been assessed as medium-high.*

ISSUE 53: Has South Nutfield been correctly assessed regarding Settlement Hierarchy?

ISSUE 54: The RA site is not on the edge of an existing Tandridge urban area which means it should not be considered available to be safeguarded for future development.

ISSUE 55: No account has been taken of how education would be provided during the transitional period which is likely to last for up to 10 years.

Conclusion

When building new housing and considering new development we have a duty to future generations not to leave them a toxic legacy.

This duty includes, but is not limited to, the loss of green fields, added flood risk, additional nitrogen oxide emissions and increasing traffic congestion. We must ensure we meet the needs of those at the bottom of the housing ladder.

If we need to build then we must ensure we only build in sustainable and accessible locations. Development, should by design, enhance and improve the immediate surroundings and not create a negative imprint on existing adjacent communities.

Redhill Aerodrome does not fulfil this basic criteria. It fails in virtually every aspect if examined pragmatically.

We suggest that development at RA is impractical both logistically and legislatively. We strongly advise TDC not to select Redhill Aerodrome as their preferred option as a new Tandridge Garden Village.

A Garden Village at Redhill Aerodrome has not been proven to be viable, can't be delivered within an acceptable time frame and so will fail to fulfil the objective sought by TDC to provide a Garden Village within the district that will benefit the majority of its existing and/or new residents.

Preamble

The Local Plan is required by law to promote sustainable development through the balancing of social, environmental and economic considerations to achieve the best overall outcome.

The NPPF advises that each Local Planning Authority (LPA) should produce an aspirational but realistic plan for its area. There is significant investment in the preparation of these plans, including engaging with all sections of the community.

New developments such as housing and employment provide both opportunities and challenges for the area. Identifying and targeting areas for growth alongside investment in supporting or creating new infrastructure. This can improve services, facilities and the quality of life of communities.

Sites are submitted by land owners/developers for consideration, however not all sites that are promoted by developers are suitable to be developed.

It is normal that following a critical analysis, some potential development site options should be ruled out if it becomes clear that there are irresolvable infrastructure issues preventing their delivery.

Introduction to Krag

Krag was formed in 1993 in direct response to a planning application by the newly formed Redhill Aerodrome Ventures Ltd (RAVL) to develop the existing Aerodrome into a Feeder/Reliever Airport to operate in tandem with Gatwick.

We are not anti-Aerodrome but we are against inappropriate and speculative development at the site that will change the existing rural Green Belt landscape to a more urbanised one.

Our membership numbers over 900 households in the area affected by the activity at Redhill Aerodrome (RA).

Redhill Aerodrome has always been, wholly within the Green Belt, which we believe should continue to be protected from unwanted development. We have a seat on the Redhill Aerodrome Consultative Committee, closely monitoring any proposal to develop the facility.

Producing a Local Plan

LPAs should rigorously assess the plan before it is published for consultation under regulation 19 to ensure that it is a plan which they think is sound.

The plan should focus relentlessly on the critical issues and the strategies to address them, paying careful attention to deliverability and viability. This approach may raise uncomfortable questions but the whole point of the plan is to address the critical issues as far as possible.

LPA's should not submit the plan unless it considers the document is ready for examination. The plan that is published for consultation should be the plan that the LPA intends to submit under Regulation 22 to the Planning Inspectorate.

If the LPA wishes to make any changes to the plan following the Regulation 19 consultation, these changes should be prepared as an addendum to the plan. The addendum should be subject to further consultation and, if necessary, to sustainability appraisal before submission if it is to form part of the plan to be examined.

Examination by an Inspector

The Inspector's task is to consider the soundness and legal compliance of the Plan, on the basis of the relevant legislation and the guidance in the National Planning Policy Framework (NPPF).

Considering soundness involves examining the Plan to determine whether it is:

- (a) positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- (b) justified – the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence;
- (c) effective – deliverable over its period and based on effective joint working;
- (d) consistent with national policy – able to achieve sustainable development in accordance with the Framework's policies.

We understand that the public examination of a Local Plan is not an Inquiry into objections raised by individual parties. It is structured around the issues which the Inspector has identified as crucial for his judgment on the soundness of the plan.

LPAs need to be clear about what conclusions they have come to from the range of evidence available and how they have made choices, based on the evidence.

The plan must not contain assertions of fact that are not supported by the evidence. Similarly the evidence should not be collected retrospectively in an attempt to justify the plan.

Local circumstances will be directly relevant.

For example a plan for an area vulnerable to flooding will require more extensive evidence about this matter than a plan for an area where there is no flood risk.

ISSUE 1: Is RA is being considered prior to basic land categorisation being assessed?

ISSUE 2: Developers Thakeham Homes have not submitted any credible evidence to support their speculative proposals.

Achieving Sustainable Development

The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental.

An economic role – contributing to building a strong, responsive and competitive economy. This is achieved by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. LPA's should identify and coordinate development requirements, including the provision of appropriate infrastructure.

ISSUE 3: Has the negative economic impact of the loss of the existing jobs at RA been assessed?

A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations. This can be achieved by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.

An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

ISSUE 4: Development at RA will have a negative impact on the existing Green Belt and not promote Sustainable Development.

TDC Garden Village Consultation

KRAG neither endorse nor criticise the Garden Village (GV) concept. At the same time we accept Tandridge district is subject to high levels of constraint (including landscape and nature conservation designations, areas of flood risk, and the Green Belt).

We recognise why the concept of a GV could appear to be an attractive option for TDC but would caution that its value would be contained within its ability to bring infrastructure benefits to the majority of Tandridge residents.

It should not be considered as a convenient way of building 4,000+ houses in any location regardless of the suitability of the chosen preferred site.

Creating a sustainable community with high quality communal facilities, well-maintained community green space that bring people together and forge a true community spirit is the heart of this type of scheme.

However if it is in the wrong place then it will not achieve its design potential. In fact it will be designed to fail. That is not a legacy that Tandridge will wish to leave future generations.

The very fact the Redhill Aerodrome site falls within 2 different administrative districts makes this site a less attractive proposition for Tandridge District Council. This fact is highlighted by the emerging evidence is that the majority of the housing provision would now appear to fall within the Reigate and Banstead area.

It will be much more difficult to establish a cohesive new community if it is split across two different districts. This is an avoidable problem that would be resolved by selecting a site that is sole contained within TDC boundaries.

The selection of a site, such as RA, that crosses boundaries will make delivery much more difficult and may actually compromise the key objective. This would severely detract or even negate any positive impact it could have for existing Tandridge residents.

There is little doubt that transportation infrastructure within central Tandridge needs improvement, both road and rail. The major roads A22 and A23 are already severely congested and the Tonbridge to Redhill rail line will soon be offering a reduced service that is already considered extremely unreliable.

Building a GV that increases pressure on these already over capacity roads would run the risk of rightly being considered to be completely unsustainable when examined by any third party.

The same test will apply to a new community that is not connected to the rail network.

By design the GV is meant to be self-sustaining and independent. But the key factor to the success of a new GV will be its placement. This is entirely within the control of TDC.

A GV should have the ability to enhance its setting but it must not have a negative impact on its surroundings and the existing communities that are closest in location.

ISSUE 5: Selection of a cross border site will complicate and potentially delay delivery.

ISSUE 6: The new development must not have a negative impact on existing communities.

KRAG view on a GV at Redhill Aerodrome

KRAG strongly objects to the development of the proposed Redhill Aerodrome Garden Village. A development that promises to deliver up to 8,000 new homes, employment land, and supporting social infrastructure on land that straddles the administrative boundary with Reigate & Banstead Borough Council.

KRAG is firmly of the view that the proposal to construct any new settlement at the site of Redhill Aerodrome is fatally flawed due to the already recognised acceptance that it cannot be delivered within the TDC Local Plan period to 2033. This very fact alone should disqualify it from further consideration.

If TDC attempt to proceed with Redhill Aerodrome as their preferred GV site we believe they would be open to severe criticism when their Draft Local Plan was examined by a Planning Inspector. Effectively they would be promoting a Plan they already recognise will not result in the delivery of new jobs and homes with the specified Plan period.

This could create a need for an early review of the draft Local Plan, wasting public time and money.

ISSUE 7: RA cannot achieve the planned Local Plan timetable.

Affordable Housing

There is little detail provided by Thakeham Homes as to how any affordable housing aspect of the proposed development will actually be financially accessible for the eventual owners.

The figure of 80% of market value is used to describe this element. However expressing this figure in percentage terms only disguises the fact that the initial average house price will still be very high because of local market conditions. This will negate the affordable aspect of the houses provided.

Housing affordability, particularly in the south of England, is putting a rural home out of reach for many people, especially those looking to buy their first property.

House prices in the Tandridge area reflect high land values fuelled by its close proximity to London. These facts are unlikely to change by the building of a GV in any of the locations under consideration. This is not solely a question of supply and demand.

The Halifax Bank Rural Housing Review published in September 2017 found:

“Rural homes are 20% more expensive than those in urban areas.

First-time buyer’s account for 41 per cent of all mortgage financed purchases in rural areas, compared to 53 per cent in urban areas.

Affordability is the main reason for the lower proportion of first-time buyers in the countryside.”

It is a fact that over the last decade house price growth has outstripped income growth, driving up costs across tenures and resulting in many households spending a growing share of their disposable incomes on housing.

It is accepted that rural property attracts a premium. This is validated by the Halifax report. The premium price appears to be exaggerated if the property is situated within commutable distance to London.

However this fact has not been factored into the latest Government figures that indicate that TDC (and other LPA's) need to increase house building to combat a lack of affordability. The overly simplistic Government approach is completely unrealistic as the housing market requires a more nuanced approach especially in the Home Counties.

So it can be surmised that the building of a GV within Tandridge will not automatically result in property becoming more affordable because of the increase in supply. The attractiveness of the Tandridge location will keep prices high which is exactly why developers are so keen to build in our district.

ISSUE 8: How “Affordable” will the houses built at RA be if they have to reflect the high cost of the infrastructure required to facilitate the development?

Delivery Timetable

History shows that the provision of new settlements usually takes considerably longer than originally envisaged, with build out rates often becoming stretched out well beyond the original build forecast.

The bigger the settlement the greater the likelihood for delay. Consequently, there is a considerable risk that the emerging Local Plan will fail to deliver the required dwelling numbers (including affordable housing) within the plan period.

This is exacerbated at Redhill Aerodrome at which it is already accepted cannot meet the Local Plan delivery date.

The build out rate offered by developer Thakeham is between 150 -300 houses per year. It should be noted that on this basis (300 houses per year) it will take over 26 years to build 8,000 houses at RA, building at 150 houses per year it will take over 53 years to deliver.

The result of retarding the build out rate is to protect the value of the properties offered for sale. This will increase profits for the developer but make the properties offered for sale more expensive. This is advantageous for the developer as by controlling the supply it will hold house prices artificially high.

This deliberate choke on supply controls to price as the market will not have too many houses available at the same time.

An increase in the build rate would result in a positive outcome for potential buyers, making the properties more affordable. At whichever site is chosen TDC should insist on a much higher build rate if they are serious in helping to create more Affordable housing.

ISSUE 9: Development at RA is unlikely to provide Affordable Housing in significant numbers within the Plan period.

ISSUE 10: The build out rate should be significantly improved to benefit purchasers.

Promoting Sustainable Transport

To provide context the following statements are extracted from the NPPF.

NPPF Extracts

Paragraph 29. *"The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel."*

Paragraph 30. *"Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. LPA's, when preparing local plans, should facilitate the use of sustainable modes of transport."*

Paragraph 34. *"Developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised."*

Paragraph 35. *"Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people."*

The following extracts are offered to provide local context.

TDC Spatial Approaches Topic Paper: Sites Consultation (2016)

5.1 *"The NPPF is clear that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Through the Core Strategy, the Council seeks the provision of appropriate levels of infrastructure and service provision, highlighting the significant need to manage travel demand and promote accessibility by modes of transport other than the private car. This is an important step in striving to achieve the Core Strategy objective which seeks a reduction in projected carbon emissions to minimise the impact on climate change."*

The evidence that TDC already possess indicates that the (Redhill Aerodrome) site does not have access to the strategic road network or public transport and access to amenities and facilities is poor.

Extract from TDC Sites Consultation Regulation 18 4/11/16 - 30/12/16

1.12 *"In terms of the economy, the TDC recognises many of the working residents in the district commute into London for jobs. Given the diverse*

range of opportunities and potential for higher salaries, this is understandable, but is not a trend the Council is seeking to change or presume can be stemmed."

SCC The Surrey Transport Plan Tandridge District Draft Local Transport Strategy and Forward Programme - December 2014

3.11 "Surrey has relatively high levels of usage on its roads and there are particular congestion issues in many areas of East Surrey at peak times. There are significant volumes of traffic passing through the District including on the M25 and M23."

4.10 "88.2% of households in Tandridge have access to one or more cars higher than the South East average of 81.4% and the England average of 74.2%."

4.12 "Of the working population in Tandridge 42 percent work within the District, 32 percent of the working population commute to London with the majority commuting to inner London and Croydon, 13 percent commute to areas in Surrey, 8 percent commute to West Sussex. The remaining 5 percent of the working population commute to Kent and other areas in the south east."

KRAG Comment

It is already accepted by TDC that the population of Tandridge have higher access to cars than is normal.

In terms of commuting to work to locations outside of the District, Tandridge is the highest in Surrey. In terms of method of travel to work, Tandridge has the highest levels in Surrey of commuting by train to work with 13% of people using this method, but the majority travel by car, equating to 62%.

The Redhill Aerodrome site has no rail link and is served by a network of local roads that are already at capacity. It is apparent that the use of car mode travel is already dominant in the district.

This will be exacerbated by the provision of up to 8,000 new houses at the site which is not connected to any public transport network and is extremely poorly situated to be accessible by any other means than the private car.

TDC evidence already indicates that the Redhill Aerodrome site does not have direct access to the strategic road network or public transport and access to amenities and facilities is poor.

However current TDC policy is to promote accessibility by modes of transport other than the private car, this is in line with the requirements of the NPPF.

Through the existing TDC Core Strategy, TDC seeks to highlight the significant need to manage travel demand and promote accessibility by modes of transport other than the private car.

This is an important step in striving to achieve the TDC Core Strategy objective which seeks a reduction in projected carbon emissions to minimise the impact on climate change.

But the ability to achieve this diversity of travel options will not be possible if the Redhill Aerodrome site is developed due to the absence of a rail link included within the proposal.

This will result in increased car usage as it is the only realistic option for independent travel.

The selection of Redhill Aerodrome as the preferred option would compromise TDC Core Strategy and be non-compliant with the NPPF guidance. Accordingly, we submit that the proposed development does not meet the national, regional and local planning policy imperative to minimise the need to travel, and thereby conform to meet the demands of climate change.

In view of this, RA cannot reasonably be considered to be located in an accessible or sustainable location.

Any viable overall spatial strategy should focus on locating future development in areas of the district that are highly accessible. This will enable increases in the capacity of existing transport infrastructure, reducing the need to rely upon the delivery of substantial new schemes.

This sensible and pragmatic approach would not be possible at Redhill Aerodrome as it has no existing infrastructure to build upon.

ISSUE 11: Development at RA would be car mode orientated. This does not comply with the NPPF regarding the promotion of Sustainable Transport and the choice of how to travel.

ISSUE 12: Development at RA would conflict with the existing TDC Core Strategy to reduce projected carbon emissions and to minimise the impact on climate change.

Existing Local Roads & Traffic Congestion – see also Appendix 2

The NPPF promotes the use of sustainable travel modes, achievement of safe and suitable access for all and improvements to effectively limit significant impacts of a development.

Highways England is responsible for operating and improving the motorways and major A roads in England, otherwise known as the Strategic Road Network.

The A22 and A25 trunk roads and M23 and M25 motorways are the key strategic roads connecting Tandridge to the wider region and beyond. However, transport and traffic constraints are already widespread across Tandridge District.

This fact will mean the planning and selection of a new Garden Village settlement will have a major impact on existing roads of all categories.

To mitigate this development that generates significant traffic growth must be approached in a sustainable way.

In general terms the current transport experience in the District has a bad reputation.

This is a result of a combination of issues.

- Significant, recurrent traffic congestion is experienced during peak hours on the A25 trunk road as it runs through the villages of Nutfield, Bletchingly and Godstone.
- Congestion on the Strategic Road Network frequently spreads to the Local Road Network (LRN) and vice-versa.
- The adverse impacts of localised traffic congestion and/or high traffic volumes on the amenity of existing rural communities.
- This would include road safety, severance, noise, air quality.
- TDC already recognise that severance could be an issue for development at Redhill Aerodrome given that the link road through the development would likely need to be dual carriageway to cater for the traffic flows between the A23 and M23.
- Intensified and additional new challenges resulting from future predicted higher levels of traffic on roads in the district, generated by the demand for travel to and from existing and future homes, workplaces, shops and leisure facilities.
- Inadequate parking provision, especially at rail stations.
- The discouragement to walking and cycling caused by the absence of pavements on rural roads, no street lighting and poor condition of the edges of existing roads making cycling dangerous.

According to Surrey Future - Congestion Report 2014, congestion on Surrey's local roads, trunk roads and motorways, is estimated to cost Britain's economy £550 million per annum. Surrey Future is a partnership initiative formed of Surrey's Local Authorities and business community. Surrey Future includes TDC.

The claim that the RA development will self-fund road infrastructure improvements is unsubstantiated and the claim that no public funding will be accessed is likely to be disingenuous.

In any event any money spent by the developer on the provision of infrastructure will ultimately be recovered from the sale of the houses built. On that basis it is reasonable to conclude that the infrastructure provision costs will have a direct correlation on the average price of the houses subsequently built. This will not assist the affordability aspect of this proposed development.

Congestion can lead to unreliable journeys where it is difficult to predict how long a journey will take. As Surrey's road network is saturated it has little spare capacity to cope with unforeseen incidents, such as accidents, poor weather and road works. This can lead to long queues on several key roads within the county of Surrey which act as a deterrent to new businesses who might locate to Surrey or, in some cases it can prompt existing Surrey businesses to consider relocating to areas with lower traffic levels.

Congestion is likely to worsen in the future as the population in Surrey is predicted to grow 9 percent over the next 20 years, placing additional pressure on transport infrastructure.

Traffic congestion acts as a drain on the local economy. This includes the costs of delays and negative impacts on the amenity and attractiveness of town centres which can deter visitors and shoppers.

It is also a constraint upon existing businesses within the county and has a negative impact on growth as accessibility by road is a major consideration for business location decisions.

Congestion not only has a negative impact upon the economic competitiveness of the county but also can have a negative impact upon the natural environment.

The location of the RA site which is away from the existing main Tandridge based routes (A22 and A25) and the inadequacies of pedestrian, cyclist and public transport provision will not encourage the use of alternative travel modes. It will be car dominated, will generate vast amounts of car journeys by the very fact there is no credible alternative.

The existing site is currently served by small rural lanes, almost exclusively with no pavements. These provide very limited connectivity to the site from any direction. These roads are narrow and already considered dangerous by local residents. They do not have additional capacity to cope with any further development, let alone the Garden Village proposed.

The existing road infrastructure that serve the Aerodrome has serious inadequacies. They are roads rural in character with variable road widths often with restricted visibility.

This is especially apparent in the winding character of King's Mill Lane, the congestion already experienced at key junctions during the peak hour and the inconvenience and inability to access public transport.

During any construction and/or transitional period they would prove completely inadequate and would result in the existing local communities of South Nutfield, Salfords, Outwood and Whitebushes being completely swamped with traffic. This is unacceptable but is left unaddressed by Thakeham.

The fact remains that Redhill Aerodrome is not well located to promote sustainable transport solutions. This must place a constraint on the extent to which these inherent problems, caused by its remote location may ever be satisfactorily addressed.

A development proposed is of a type that will generate a significant amount of traffic movements. But RA is not in a location that will possibly minimise the need to travel and maximise the use of sustainable travel modes.

How will this development enhance the key strategic road network of the A25? On this basis alone RA is not a sustainable location supported by the NPPF.

ISSUE 13: Development at RA will exacerbate local road congestion.

ISSUE 14: RA is not a sustainable location for the type of development and its promotion as a Garden Village is not supported by the NPPF.

Air Pollution

Road traffic is a key issue in relation to air quality. Stop start driving conditions and slower vehicle speeds resulting from congestion can lead to higher roadside pollutant concentrations.

There are international, EU and national policies for carbon dioxide emissions reduction and energy planning, but the current energy and planning policy framework in England is fluid, with many policies changing and little short-term certainty. The Brexit situation is likely to add to this confusion.

Despite this confused policy environment, it is clear that local authorities have a responsibility to adopt strategies to mitigate and adapt to climate change in their Local Plans.

The proposed development at RA will bring no benefits in terms of air pollution to local residents.

ISSUE 15: Development at RA is likely to exacerbate local air pollution.

M23 Capacity

The M23 is a key strategic road which connects Crawley and Gatwick Airport to the M25 motorway, routes into London and the rest of the UK. The stretch of the M23 between J8 and J10 is heavily used by traffic travelling to and from Gatwick Airport and between Brighton and London, especially during UK holiday periods.

The prospect of a second runway at Gatwick should be a material consideration regarding the proposed development at RA and its relationship with the M23. Should Gatwick apply to build a second runway upon the expiration on 31st December 2018 of their current legal agreement with West Sussex County Council, the M23 will require further capacity to handle the inevitable increase in traffic.

Airports are reliant on permanent access being available by both rail and road. The existing M23 Section between J8 and J10 is already considered so busy that Highways England will soon (spring 2018) commence work on converting it to a Smart motorway to increase capacity.

Smart motorways are a technology-driven approach to the use of motorways. They increase capacity and relieve congestion while maintaining safety. Smart motorways are designed to help make journey times more reliable.

The additional of a new junction to serve the 8,000 houses proposed at RA will significantly increase traffic, especially within peak periods. This could result in further congestion on the only motorway link to the second busiest airport in the country.

Gatwick Airport Ltd have already assessed the traffic they believe will be generated if the airport was allowed to expand. They concluded that they will need to fully fund a doubling in capacity at Junction 9 of the M23, creating improved routes into an expanded airport, better access to Crawley and relief to Junction 10 of the M23.

Even without the addition of a second runway Gatwick Airport announced in August 2017 plans to invest £1.15bn over the next five years – with £240m planned for 2017/18 alone – as it plans for more growth and improved efficiency.

The 2017 Capital Investment Programme (CIP) sets out Gatwick's investment strategy which continues to improve facilities and transform service. Since the airport changed ownership in December 2009, Gatwick has invested £1.5bn.

This would seriously call into question the wisdom of allowing the RA proposal to proceed if it resulted in constraining vehicular access to an expanded Gatwick Airport.

On this basis it is uncertain that Highways England would approve a new junction to the RA Garden Village as proposed if they believed it could restrict traffic flows to a newly expanded major aviation infrastructure project. This would not be in the national interest. This uncertainty creates a further doubt of the viability of the RA proposal.

Strategic planning must take a medium to long term view of such matters. Permitting development at RA that could cause Gatwick Airport traffic congestion issues would be poor practice and just foolish.

ISSUE 16: The new motorway link may increase traffic congestion at Gatwick Airport.

M23 New Junction

The RA proposal will attempt to create a new junction off the M23 to serve the new settlement. It is accepted by all concerned that without this new dedicated junction the development cannot proceed.

Work to convert the M23 into a Smart Motorway between junctions 8 and 10 are scheduled to be completed in 2020/2021. This will delay the connection of any new junction at Redhill Aerodrome for a further 5 years as other work on this section of the motorway will not be permitted during this period.

There is no agreement with Highways England to permit this new junction. All discussions so far have been high level and preliminary only.

The obvious conclusion is that development at RA is not viable without an agreement with Highways England to permit the new junction.

For TDC to select RA as their preferred option to build a GV without confirmation from Highways England that a new dedicated motorway link is viable and acceptable would be a very risky and ill-advised strategy.

In any event Highways England have already identified that the proposed 8,000 may be insufficient to permit a new junction.

EXTRACT FROM HIGHWAYS ENGLAND EMAIL Dated 13th September 2017

Re a) we note that the currently envisaged scale of the development (6,000-8,000 homes + 3,000 jobs + all community infrastructure) appears smaller than elsewhere where new development has justified new Motorway junctions (eg M20J10a at Ashford, Kent, M49 at Severnside, M1 at Dunstable), but equally note that there are no set thresholds. Therefore the "business case" that incorporates both planning reasons to justify the location (eg in Green Belt etc) and transport reasons to justify a new motorway junction will be crucial.

ISSUE 16: Thakeham have publicly stated that development at RA is not feasible without a new M23 junction.

ISSUE 17: Discussions with Highways England are only at a very preliminary stage.

ISSUE 18: The 5 year delay on additional work on the M23 will further retard the delivery of any new junction should it ever be permitted by Highways England.

ISSUE 19: The proposed development may not be big enough to be considered by Highways England to be viable.

ISSUE 20: The provision of a dedicated M23 motorway link to the proposed development is pure conjecture. It cannot be relied on as credible at this fledgling stage. TDC would be ill advised to select RA as their preferred option on this basis.

M23 New Junction – Benefit to Tandridge residents

The proposed new junction and link road which will end at the A23 junction has been described by Thakeham as the only access to the new development. It is designed to run as a dual carriageway through the development effectively cutting it in half.

In December 2016 a clear statement was made by Thakeham MD Rob Boughton at the Redhill Aerodrome Consultative Committee presentation that the RA development will be effectively sealed off from the existing road network, but this is not a credible proposition.

The myopic new M23 junction proposed by developers Thakeham as their contribution to infrastructure improvements within Tandridge is actually designed to take the new residents of the GV away from Tandridge. How will that benefit our District? It is a specious argument.

It should be noted that the M23 does not connect to any of the recognised Tier 1 or 2 settlements within Tandridge, in fact the Motorway network serving the development with the exception of the M25 Junction 6 does not connect to anywhere in Tandridge.

On this basis alone RA is not a sustainable location supported by the NPPF.

ISSUE 21: A new link to the M23 to serve the RA development will bring no benefit to the majority of TDC residents.

Rail Link

The RA site has no rail connections and currently no availability of public transport. In fact no rail links are being proposed at the RA site but they already exist at another site being considered within this process. In any event the Redhill/Tonbridge line has a very poor rail service. Currently plans exist to further reduce services.

It is interesting to note that within the documents submitted by the various companies that are vying to build a Garden Village in the TDC area details exist of a meeting, and subsequent correspondence between rail operator Govia Thameslink Railways and Bonnar Allan Ltd who represent developers of sites other than Redhill Aerodrome.

The meeting and letter concerns potential new housing developments at Leigh, Edenbridge and South Godstone, and potential increases in capacity on the Tonbridge-Redhill rail line.

No mention is made of Redhill Aerodrome which is surely indicative of no attempt being made by Thakeham Homes to link their proposed development to the rail network. We would consider this unusual unless it is being accepted by Thakeham that their proposed development could never benefit from a direct rail link.

It will be a challenge to access rail stations from the RA site without the use of a car. Current car parking arrangements at the existing rail stations are completely insufficient. Parking at Nutfield, Earlswood and Salfords Railway Stations is already at capacity.

The NPPF is clear that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However Redhill Aerodrome would appear by design to be accessed by car only mode which contradicts policy to reduce dependency on car mode.

On that basis we would contend that Redhill Aerodrome is an unsustainable location, especially in comparison to other sites that are included within this Consultation.

ISSUE 22: RA, by design, will never be linked to Rail Network. This will result in a car dependant development which is contrary to NPPF guidelines.

Infrastructure Provision

It is essential that new development, where possible, avoids or otherwise mitigates, its own adverse effects.

By achieving this it will secure the necessary infrastructure benefits for the existing neighbouring and wider communities who should not suffer the burden of providing for new development.

Thakeham have completely failed to properly quantify the infrastructure requirements arising from such a large development. An assumption is made that a new community can be dropped onto a remote, Greenfield site and developed from scratch. That is misguided at best and disingenuous at worst.

They underestimate the complexity of delivering infrastructure within a reasonable timeframe given the myriad of external dependencies upon which it relies.

Utilities providers including water, waste, electricity, gas and telecoms/ broadband; highways; education services and health services are not costed. The claim that many of the required infrastructure will be funded by the developer are vague and hence cannot be relied upon.

Provision of such infrastructure will be prohibitively expensive, much greater than the other sites under consideration. These will be recovered by the developer through the development process. This will inevitable impact on the cost of the houses build, increasing unit prices accordingly.

How does that contribute positively to creating affordable homes?

ISSUE 23: Provision of the required infrastructure by the developer will increase the average house price. Impacting affordability.

ISSUE 24: If TDC select RA as their preferred option they will be contributing to increased property prices in their district.

Flooding & Climate Change

Planning for new communities has a vital role to play in dealing with climate change. This can be achieved by delivering renewable energy systems; ensuring that there are high levels of energy efficiency in buildings; implementing sustainable transport systems; and undertaking a whole range of resilience measures including strategic flood defences

Above all, planning should take the long view, addressing not just the needs of today but preparing for a changing climate, looking 50 and 100 years ahead.

Flood risk assessments: climate change allowances

The Environment Agency (EA) provided new advice Flooding and Coastal change which was published on 19th February 2016.

This document updates previous climate change allowances to support the National Planning Policy Framework (NPPF). This advice should be referred

to when LPA's are preparing local plans and considering planning applications.

Previously the NPPF provided recommended national precautionary sensitivity ranges for peak rainfall intensities, peak river flows and net sea level rises. The latest updated guidance now however includes predictions of anticipated change for peak river flow by river basin, peak rainfall intensity in small and urban catchments, and sea level allowance.

The Environment Agency provide a range of allowances based on statistical probability (the chance that peak river flows or rainfall intensity will increase by more or less than an allowance level for a particular scenario).

The EA flood risk vulnerability classification for the type of development and the categories of Flood Zone (1, 2, 3a or 3b) is used as a guide to decide which allowances to use.

It should be noted that residential development is normally considered as 'more vulnerable' and commercial is 'less vulnerable'.

The EA advice also considers the lifetime of the development (e.g. residential developments are considered to have a lifetime of 100 years).

The four EA flood risk categories are:

Flood Zone 1 - sites within Flood Zone 1 are considered to be at a low risk of fluvial flooding.

Flood Zone 2 - generally, there is a medium probability of flood risk.

Flood Zone 3a - high risk of flooding means that stringent criteria are required for new developments to be acceptable.

Flood Zone 3b - the functional flood plain is where water has to flow or be stored in times of flood. Only water compatible uses and essential infrastructure can be considered in the functional flood plain.

Certain categories of land should be categorised as having an absolute restraint on development.

Land falling into this designation includes Ancient Woodland and land that falls within Flood Zone 3b.

Land categorised within Flood Zone 3a should be considered to have significant constraint. The high probability of flooding within Flood Zone 3a, means it is therefore not suitable for residential development unless the sequential test (see below) has been passed and exceptional circumstances can be demonstrated.

Inhibiting development within land categorised within Flood Zone 3b aligns with NPPF (paragraph 100), which emphasises that the sequential test should be applied to avoid inappropriate development in areas of flood risk.

The high probability of flooding within Flood Zone 3b means it therefore should not be considered suitable for residential development.

The Sequential Test:

The Sequential Test is part of the risk based approach to flood management and is required by the NPPF. It seeks to ensure that Local Planning Authorities steer development to areas of lowest flood risk, requiring them to establish that there are no reasonably available development sites within the areas of lowest flood risk before considering development in areas of higher flood risk.

For example, in Flood Zone 3a (high probability of river flooding) a 'more vulnerable' development such as residential would need to use the higher and upper end allowances over the next 100 years.

Previously a national 20% increase in peak river flows was applied for 'more vulnerable' residential development (100 year lifetime).

Based on the EA new guidelines however in South East England this increase in river flows could be as high as 105%.

This could conceivably have a huge impact on flood levels and the extent of flooding on a development site and therefore significant implications on the development.

Previous advice specified that a 30% increase in peak rainfall intensity was applied for 'more vulnerable' residential development (100 year lifetime).

However based on the new guidelines a 40% increase will need to be considered. This increase could impact on the surface water drainage strategy for a development, with potentially larger soakaways or storage ponds / tanks / SUDS required.

The EA will also insist on like for like replacement of existing flood areas where these are lost by the land raising for the development or the spur road, thus substantially reducing the available developable land. This is a relevant consideration for any development at RA.

It is recognised that some of the land at RA falls into the Flood Zone 3. The majority of the land affected falls within the TDC area. This will negatively impact the land available for development within the TDC area.

The RA site was not evaluated by either of the TDC Strategic Flood Reviews undertaken in 2015 or 2016. The consequence of this is that it is unknown how the land already categorised as within Flood Zone 3 will impact the deliverability of this site and how much mitigation measures would cost.

ISSUE 25: The RA site includes land within Tandridge that falls within Flood Zones 3A and 3B. These areas are considered to be of high risk of flooding.

ISSUE 26: Environment Agency advice is that Local Planning Authorities should steer development to areas of lowest flood risk, requiring them to establish that there are no reasonably available development sites within the areas of lowest flood risk before considering development in areas of higher flood risk.

ISSUE 27: No Strategic Flood Assessment has been made on a site known to be partially categorised in Flood Zone 3.

ISSUE 28: No Sequential Test has been undertaken at RA, a site known to be partially categorised in Flood Zone 3. Exceptional circumstances have not been demonstrated.

Status of the Green Belt

The fundamental principle of Green Belt, to maintain openness, i.e. keeping land free from buildings, is robustly defended by Planning Law, national planning guidance, precedents and case law.

At the core of this designation is the 'in perpetuity' requirement, that Green Belt boundaries will be maintained for much longer than the usual 15 or 25 year local plan period.

In the past, county, regional and sub-regional planning authorities adopted robust policies to safeguard Green Belt; local authorities relied on these strategic cross-boundary policies.

Since Regional Spatial Planning was abolished in 2011, these strategic safeguards have been dismantled and, because of the loss of these over-arching policies, many local authorities now see the need to review the Green Belt as part of their Local Plan process.

Green Belt reviews currently underway in many areas will almost certainly bring about significant changes in the extent of existing Green Belt, without any changes to national policy.

It is anticipated this process may result in the release of extensive areas of land from the Green Belt designation in future years. This is exacerbated by pressure to increase the rate of house building.

As this Green Belt review process unfolds it is apparent that individual local authorities have no model methodology or protocols to follow, so the outcomes in terms of qualitative analysis are likely to be inconsistent in the way they are implemented.

Until guidance is issued or precedents are set this situation will leave LPA's vulnerable to their Local Plan's being challenged when examined by a Planning Inspector due to the approach adopted.

It should be noted that the Redhill Aerodrome site was not even mentioned in the latest Green Belt review undertaken by Reigate & Banstead Borough Council.

ISSUE 29: Is TDC confident that it has adopted an acceptable approach when reviewing its Green Belt land and in particular RA?

Green Belt Reviews

Green Belt National Guidance - NPPF

The NPPF is intended to provide up-to-date, accessible and useful guidance on the requirements of the planning system.

The Guidance was updated in October 2014, reiterating the importance of the Green Belt and acknowledging that Green Belt may restrain the ability to meet housing need.

The NPPF, emphasises the importance and permanence of Green Belt. It sets out clearly the five purposes that the Green Belt is intended to serve, highlights that the Local Plan process offers the **only opportunity** for the Green Belt boundaries to be reviewed, and stresses that boundaries should be defined using permanent and recognisable physical features.

The following paragraphs are relevant to Green Belt Assessment:

- **NPPF Paragraph 044 Do housing and economic needs override constraints on the use of land, such as Green Belt?** – *"The NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole, or specific policies in the Framework indicate that development should be restricted" (as it is with land designated as Green Belt). 'The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.'*
- **Paragraph 045 Do local planning authorities have to meet in full housing needs identified in needs assessments?** – *"Assessing need is just the first stage in developing a local plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."*

Neither the NPPF, nor the supporting National Planning Practice Guidance, provide guidance on how to conduct a Green Belt Review *per se*. The implied emphasis is thus on each authority to develop a methodology which is appropriate to the local context.

National policy (NPPF) requires that the Green Belt be protected from inappropriate development and that once established, boundaries should only be altered in exceptional circumstances through the plan making process.

When considering whether to amend the boundary of the Green Belt, the starting point for every local authority is that this decision should only arise after all reasonable and acceptable efforts have been taken to maximise the amount of development within the urban area. Optimising densities and ensuring that all land is appropriately used must be the first response to growth.

This would include a review of employment land and other areas or uses that are protected by planning policies, commensurate with ensuring the proper balance between residential, employment and other uses.

The Housing White Paper 'Fixing our Broken Housing Market' (February 2017) states that:

"we propose to amend and add to national policy to make clear that...authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements."

This includes:

- making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;
- the potential offered by land which is currently underused, including surplus public sector land where appropriate;
- optimising the proposed density of development; and
- exploring whether other authorities can help to meet some of the identified development requirement
- We consider that these advantages do not outweigh the damage to this area of landscape that would result in its removal from the Green Belt.

The Housing White Paper 'Fixing our Broken Housing Market' (February 2017) re-emphasizes that part of the test of exceptional circumstances requires that all other reasonable options have been considered first before Green Belt boundaries are amended.

Neither the NPPF nor the Planning Practice Guidance (PPG) defines 'exceptional circumstances', and therefore each Local Planning Authority must decide for itself whether these circumstances exist in relation to designated Green Belt within their administrative area.

KRAG Comment

TDC currently have no brownfield register without which they are unable to commence a Green Belt review as all reasonable and acceptable efforts have not been taken to maximise the amount of development within the urban area.

ISSUE 30: TDC must establish a brownfield register prior to undertaking any Green Belt review. This has not happened.

Green Belt at Redhill Aerodrome

The Redhill Aerodrome site is located within the Green Belt and continues to fulfil several Green Belt purposes. This was tested at the Redhill Aerodrome Public Inquiry as recently as 2014.

This site was examined at the Appeal Court in October 2014. None of the other sites being considered by TDC under this Garden Village Consultation have had such recent legal examination regarding its Green Belt status.

The NPPF states that Green Belt boundaries can only be altered where exceptional circumstances exist. On its own, the suitability of a site for housing is unlikely to amount to an exceptional circumstance.

Similarly, unmet housing need does not on its own constitute an exceptional circumstance justifying development in the Green Belt. The District Council has not (so far) identified any exceptional circumstances to support the deletion of the Green Belt at Redhill Aerodrome.

Green Belt Text Redhill Aerodrome Public Inquiry 2014

1. The Framework states that when located in the Green Belt inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The Framework provides that substantial weight should be given to any harm to the Green Belt, and very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
2. Such development would have a significant adverse effect on the openness of the Green Belt. The scheme would have many urbanising features, such as extensive parking and lighting, which would affect the countryside, even if controlled by condition. The resultant encroachment into the countryside would be at odds with one of the purposes of the Green Belt.
3. On the first main issue, I find that the proposal would be inappropriate development in the Green Belt. Furthermore, it would be at odds with one of the purposes of the Green Belt, and would erode its openness. The proposed development would, therefore, harm the Green Belt. I next consider whether the proposal would result in any other harm, and then have regard to other considerations, so as to undertake the balancing exercise outlined above.

The Practical Implications of the 2014 Appeal Court Decision

Below is a summary of how the Appeal Court decision in October 2014 has impacted the implementation of Green Belt policy. It was written by leading solicitors Lichfields on 30th October 2014

"The Redhill Aerodrome Appeal has impacts beyond development at airports and effects all future decisions in the Green Belt. In practical terms, for any development in the Green Belt, the following should now be carefully considered:

- In weighing up whether very special circumstance exist, the determining authority can take account of all planning matters, whether they cause harm or benefit to the proposal.
- Therefore, applicants must consider all negative impacts of the proposed development and the effect that they may have on decisions in the context of the Green Belt, by virtue of being 'any other harm'. By way of example, this might include minor increases in traffic movement, impacts to a heritage asset or increases in noise pollution.
- In weighing up whether very special circumstances exist, an authority can consider the cumulative effect of individual impacts. This is regardless of whether or not they are considered harmful to the Green Belt as individual considerations.
- The NPPF does not affect a fundamental shift in policy governing the Green Belt, at least not to make development easier. The presumption against inappropriate development in the Green Belt remains unaltered and is not diluted by the NPPF's attempt to simplify and clarify planning policy through a single document.

It is common ground that all "other considerations", which will by definition be non-Green Belt factors, such as the employment and economic advantages referred to by the Inspector in her decision in this case, must be included in the weighing exercise.

This view was apparently supported by the NPPF as a whole and the objectives of the Green Belt policy in particular.

The five purposes of the Green Belt were restated (as per Paragraph 80 of the NPPF), as being:

- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into each other
- to assist in safeguarding the countryside from encroachment
- to preserve historic town's setting and special character
- to aid urban regeneration, by encouraging recycling of derelict and other urban land.

If the proposed development would cause some, insignificant harm to biodiversity, some insubstantial harm to the setting of a listed building, and some, unsevere residual adverse cumulative transport impact, these harmful impacts would nevertheless constitute "material considerations" militating against the grant of planning permission.

The fact biodiversity grounds, heritage grounds or transport grounds would not of themselves justify a refusal of planning permission did not mean that planners could simply ignore their harm to those interests.

In short they would not cease to be a "material consideration" merely because that particular ground, taken individually, had not crossed the threshold in the Framework for a refusal of planning permission.

If development is proposed within the Green Belt, the position will be no different, save that the “very special circumstances” test will be applied if the proposal is for inappropriate development within the Green Belt.

The protection of the greenbelt is one of the twelve core planning principles contained in the NPPF and it sets out the planning policy for development in the green belt. In particular it deals with the balancing exercise to be carried out when determining whether planning permission should be granted. Paragraphs 87 and 88 of the NPPF state that:

- Inappropriate development that is harmful to the green belt should only be approved in very special circumstances.
- “Very special circumstances” will not exist unless the potential harm to the green belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

The Court of Appeal considered whether “any other harm” meant any other harm to the green belt or should include any other harm that was relevant for planning purposes, for instance harm to landscape character, adverse visual impact, noise disturbance or adverse traffic impact.

The Court of Appeal held that “any other harm” must include non-green belt harm. This decision has re-established the green belt policy approach under the NPPF as to protecting the greenbelt.

In light of this decision, if having carried out the balancing exercise, the planning inspector concludes that “very special circumstances” do not exist, the inspector will refuse permission on the ground that the proposed development does not comply with national policy to protect the green belt set out in the NPPF.”

The natural conclusion of the Court of Appeal's decision is that the protection of the Green Belt is a central part of the National Planning Policy Framework and there has been no indication from the Government that this position has changed.

White Paper - Fixing our Broken Housing Market (March 2017)

Emerging Government thinking was indicated within the White Paper issued in March 2017 called Fixing Broken Housing Market.

This White Paper sets out that the existing protection for the green belt should remain unchanged and emphasised that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements.

So it is apparent that the Government’s direction of travel is changing regarding the provision of housing.

The following has been extracted from the White Paper:

"And that's the second big problem: **the pace of development is too slow**. This Government's reforms have led to a large increase in the number of homes being given planning permission. But there is a large gap between permissions granted and new homes built. More than a third of new homes that were granted planning permission between 2010/11 and 2015/16 have yet to be built.

Second, **we need to build homes faster**. We will invest in making the planning system more open and accessible, and tackle unnecessary delays. Development is about far more than just building homes. Communities need roads, rail links, schools, shops, GP surgeries, parks, playgrounds and a sustainable natural environment. Without the right infrastructure, no new community will thrive – and no existing community will welcome new housing if it places further strain on already stretched local resources."

Executive Summary

- Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.
- Making better use of land for housing by encouraging higher densities, where appropriate, such as in urban locations where there is high housing demand; and by reviewing space standards.

A.63. We are also proposing that national policy would make clear that when carrying out a Green Belt review, local planning authorities should look at using any Green Belt land which has been previously developed and/or which surrounds transport hubs.

A.100. We want to ensure that homes with Planning permission are built as soon as possible and discourage proposals where there is no intention to build, or there are insurmountable barriers to doing so.

A.102. We are interested in views on whether an applicant's track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development. If this proposal were taken forward, we would intend for it to be only used in considering applications for large scale sites, where the applicant is a major developer, as we don't want to deter new entrants but would like to explore whether an applicant's track record of strong or poor delivery may potentially be relevant.

A.104. Where Planning permission is granted, we want development to start as soon as possible. Our proposals to tackle points of delay and provide more support should allow developers and local authorities to be more ambitious on start dates. We are considering the implications of amending national planning policy to encourage local authorities to shorten the timescales for developers to implement a permission for housing development from the default period of three years to two years, except where a shorter timescale could hinder the viability or deliverability

of a scheme. We would particularly welcome views on what such a change would mean for SME developers.

KRAG comment

The White Paper also set out that the existing protection for the green belt should remain unchanged and emphasised that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements.

There are numerous initiatives announced within the White Paper - fixing British's broken housing market, that support increasing the rate of building new houses.

However due to the nature of Redhill Aerodrome and its relationship with the M23 Link Road (vital to the success of the scheme) the selection of RA as the preferred site for the TDC will actually be contrary to these Government led policy changes and retard housing delivery in Tandridge.

This will not serve the residents of Tandridge well and TDC should ensure this mistake is avoided by not selecting RA as their preferred option.

ISSUE 31: Development at RA would contradict the principles laid out in this White Paper regarding timescales.

ISSUE 32: Development at RA would contradict the principles laid out in this White Paper as Thakeham Homes have no track record of building a development of even 10% of the size of the proposal.

ISSUE 33: Development at RA would contradict the principles laid out in this White Paper as the land is not close to an existing transport hub.

ISSUE 34: On its own, the suitability of any site for housing is unlikely to constitute an exceptional circumstance.

Duty to Cooperate

Many Local Authorities, especially in the Home Counties, have substantial areas of Green Belt restricting their options regarding land available for development. This fact has a direct impact on their ability to meet their own housing needs as well as any needs a neighbouring authority may have.

However, Planning Practice Guidance (PPG) makes clear, the duty to co-operate is not a duty to agree.

The decision on whether to accommodate other Local Authority unmet needs is for TDC to make, having regard to the policies of NPPF and their own particular circumstances.

To do this by sacrificing Tandridge Green Belt land is very difficult to justify if it is not mandatory to agree.

ISSUE 35: Is TDC policy to surrender an area of its Green Belt to accommodate other Local Authority housing requirements?

ISSUE 36: If this is so when was this policy agreed?

Existing Employment

Local plans are not just about the provision of housing. It is a fact that the Redhill Aerodrome site is an important site of local employment. In evidence given at the 2014 Public Inquiry the owners RAL claimed it was the biggest employment site within the TDC area. We are not disputing this claim.

In developing a sustainable economy protection should be provided to the existing employment base, which will retain/provide jobs locally to reduce the very high levels of out-commuting. Developing RA will achieve the opposite as the existing 450 jobs will be lost.

Evidence accepted at the 2014 Redhill Aerodrome Public Inquiry stated:

"Substantial out-commuting occurs and local business formation and retention is relatively poor. Local recruitment is regarded as a realistic possibility because employment surveys suggest some 70% of existing site employees as resident in the surrounding area."

TDC also have more recently assessed the importance of the RA site and its contribution to the district.

Below is an extract from TDC's own documents:

TDC Spatial Approaches Topic Paper: Sites Consultation (2016)

"Overall, this employment site is considered fit for purpose and no physical constraints to development have been identified. Given the forecasted need for industrial land in 2033 is only marginally less than the estimated current stock, it is considered appropriate to safeguard this site for continued employment use. To ensure that there is sufficient suitable employment land to meet future demand over the plan period, B1 use should continue to be protected, with additional uses promoted."

It can be seen that through the Economic Needs Assessment TDC already recognise the importance to the district of the existing employment at Redhill Aerodrome.

The TDC document published in July 2014 (Tandridge Local Plan Part 2: Detailed Policies - 2014-2029) states:

"4.4 *Where the retention of an employment site is demonstrated to be no longer viable, it is expected that all other alternatives are explored before the loss of the employment land is considered. In the first instance, the site in its current form may be suitable for an alternative commercial or industrial business. Alternatively, it may be possible to redevelop the site for a wholly different type of commercial or industrial use. If neither of these options is appropriate, the site should be considered as part of a mixed-use development scheme which retains a high proportion of the commercial/ industrial use. If neither of these options is appropriate, the site should be considered as part of a mixed-use development scheme which retains a high proportion of the commercial/ industrial use."*

In general terms TDC accept that the forecast for employment related land within the district is likely to remain relatively constant.

Further Redhill Aerodrome's existing employment status is recognised within the document (AECOM Tandridge Economic Needs Assessment - 2015). There it states:

"In addition, to ensure that well-functioning sites are safeguarded and there is sufficient suitable land to meet future demand, the Council should allocate the following sites as Strategic Employment Sites."

Redhill Aerodrome is identified as Site Number 11 in a list of 8 Strategic Employment sites. TDC write:

"The RA site has been considered through the Economic Needs Assessment and is recommended for designation as a Strategic Employment Site with continued employment use and redevelopment."

However, Thakeham do not recognise the loss of existing jobs that currently exist at Redhill Aerodrome and provide no details of how the new Greenfield development will generate employment.

Employment is not generated by the mere provision of commercial premises, a more holistic strategy is required. This is absent within the information provided by Thakeham.

It is an undeniable fact that development of the entire RA site would result in the loss of 450 jobs, direct and indirect. The numbers used were presented by Redhill Aerodrome consultants York Aviation at the 2014 Public Inquiry. They were accepted by the Planning Inspector.

The loss of the existing jobs would likely happen at the beginning of the build period as the existing companies would evoke their lease break options and look for alternative premises to secure the future of their businesses.

Much of the existing work is aviation related, highly skilled and would not be replicated by new positions created by the development. The existing work/jobs would likely cease quickly if permission were given.

Even if there was a significant lead time to the commencement of the development the existing companies would likely wish to secure their future by relocating as quickly as possible. They would be unlikely to be replaced by other tenants which would result in this important employment site (so rated by TDC itself) becoming a dwindling asset with its financial contribution to the local economy ceasing.

This would create a significant loss of GDP to the local community. Evidence was given and accepted at the 2014 Redhill Aerodrome Public Inquiry that activity at the Aerodrome generated a total GVA of £18.5m.

Any new employment opportunities would be unlikely to be available until the site was substantially build.

This by TDC's own analysis is likely to be a minimum period of 15 years. If there were only a 10 year gap between the closure of the existing employment and the provision of new employment then this could result in an overall GVA deficit of some £185m. This should be a material consideration.

ISSUE 37: RA already makes a significant contribution to the local economy which will be lost if this development is permitted.

ISSUE 38: None of the other 3 sites under consideration provides such a positive contribution to the existing TDC economy.

ISSUE 39: There are 450 existing jobs at RA that will be lost if this proposal was permitted. 70% of current employees live locally.

ISSUE 40: Any new jobs would not be provided within a time frame that would benefit any of the existing employees. This should be a material consideration.

Viability

Thakeham have publically stated that the development at RA cannot proceed without the new dedicated M23 link in place. Yet they are nowhere near obtaining an agreement with Highways England for this to actually proceed. Without a quantifiable agreement to facilitate this vital and enabling infrastructure it is difficult to understand how the RA proposed development can be viewed as a creditable option by TDC.

The scant details provided so far to build a Garden Village at Redhill Aerodrome do not fulfil guidelines for environmental sustainability and do not provide a proper assessment of the inherent financial risks.

We note that substantially more comprehensive information is provided by the proposers of the other 3 sites under consideration within this process. The financial risks attached to this development are heightened given the sheer and ever increasing scale of the proposal. As the size of the proposal evolves upwards the risks change and yet this is left unremarked in the details provided.

When this is combined with the extremely long timeline for delivery, serious doubt must exist to the reality of actual delivery without shifting the risk to the public sector and therefore onto council tax payers across the District and/or County.

Policy set out in the NPPF is subject to a viability test which is framed to 'provide a competitive return to willing developers and land owners'.

Research published by the Town and Country Planning Association in March 2015 found that this has led to:

"policy on a series of vital public interest outcomes to be downgraded or removed, particularly in relation to affordable homes, building standards and green infrastructure."

This is obviously advantageous to any developer as these aspects are non-profit making.

ISSUE 41: Development at RA should not be considered a viable option without agreement from Highways England to facilitate the dedicated M23 link road.

ISSUE 42: No proper assessment of the inherent financial risks can be made as there are too many unknown factors.

ISSUE 43: The extended timeline that applies to the delivery of this proposal significantly increases the financial risks.

ISSUE 44: The high cost of essential infrastructure provision could compromise a developer making a competitive return which is contrary to NPPF guidance.

ISSUE 45: This could result in the reduction to any non-profit making aspects of the development.

General Aviation

The UK network of GA aerodromes is regarded by DfT as an important part of the national transport infrastructure.

The network of GA aerodromes around the UK has been recognised by DfT as providing vital amenities for sport flying, connectivity for business travellers and acting as an important part of the national transport infrastructure; providing economic benefits and 'point to point' access.

Maintaining access to a national network of general aviation airfields is vital to the continuing success of both the general aviation industry and the provision of a viable nationwide business, leisure and transport resource.

The network also provides important infrastructure and support for activities such as police and pollution patrols, medical flights, aerial surveys, and search and rescue operations.

For the continuance and promotion of existing jobs and growth it is important to secure the on-going future and potential of General Aviation aerodromes as an important local and national resource. However it is clear that many Local Planning Authorities do not fully recognise the General Aviation sector's importance to either their local community or wider national prosperity. We hope that TDC do not embrace this trend.

In recent years however a significant number of airfields have closed and others have been threatened as a result of owners seeking to release the value of their land and local planning authorities prioritising housing and other development on the land they occupy.

Pressures on land uses are high, especially in the SE of England, and the GA industry has long accepted the need to be proactive in engaging with local planners and the local community. This helps to identify and

promote the value of the activities undertaken on their sites, as well as mitigating environmental impacts.

Government guidance now requires planning authorities to have regard to the extent to which an aerodrome contributes to connectivity outside the authority's own boundaries, working together with other authorities and Local Enterprise Partnerships as required by the National Planning Policy Framework.

Government guidance also reminds planning authorities that a working or former aerodrome could be put forward for consideration proposed as a site for mixed use development (NPPF paragraph 17) that includes continuing, adapting or restoring aviation services in addition to other uses.

Any change of use from its role as a working airfield should only be permitted after the planning authority has fully considered the extent to which the aerodrome has contributed to connectivity outside its own boundaries. No attempt to undertake this exercise has happened at Redhill Aerodrome.

Planning authorities should consider encouraging owners of airfields who intend that there should be a final closure and cessation of business to complete full and proper consultation, operate a cooling off or review period in which demolition, asset sale or other disposal of key airport equipment do not take place. No attempt to undertake this exercise has happened at Redhill Aerodrome.

Aviation is a dynamic sector of Britain's social and economic base, but for this industry to continue to play its role it requires both the safeguarding of the current aerodrome infrastructure and, via the proactive involvement of Local Planning Authorities in line with National Policy Planning Framework, the creation of long-term confidence.

ISSUE 46: The network of GA aerodromes around the UK and the connectivity provided should be seen as a national asset, providing economic benefits to the country as a whole.

ISSUE 47: Development at RA will require the closure of the existing aviation related activity. This will result in the cessation of the last fixed wing Aerodrome in Surrey.

ISSUE 48: RA provides an important diversion facility for other GA Users.

ISSUE 49: RA offers training to student pilots that may not be available elsewhere within a reasonable distance.

Emergency Services at Redhill Aerodrome

NPAS - National Police Air Service

Redhill Aerodrome is currently the base of two Emergency Service providers (NPAS – National Police Air Service and the KSS Air Ambulance).

NPAS have 15 bases nationwide and have been based at Redhill since October 2012.

The following information has been provided informally (email) by NPAS (Redhill). It details the impact that their activities have on the surrounding area.

"Our operational area comprises the South, South East and London (which is our 'usual' area of operation but being borderless this area can be extended if operationally required).

Between 1st Sept 2016 and 1st Sept 2017 NPAS 15 'G-CPAS' – The 'usual' helicopter that is crewed by Redhill staff were directly responsible for locating:

42 missing persons – *persons either wanting to be missing or missing unintentionally (lost). Locating them and bringing them to safety from harm is the priority.*

This is achieved in association with local ground Police Officers, but very often, due to our technical capability and vantage point we are often solely responsible for locating them but we must not assume to take all of the credit – it is very much a team effort!

28 Injured person located – same concept as above.

Therefore 70 vulnerable people located in total.

84 suspects at large located. I would suggest this number is higher as often there is more than one suspect located at the same incident, but we here are counting incidents rather than persons – so this could actually, but speculatively, be double or more – 84 is the minimum. Again, always working hand in hand with our ground officers who after all are the ones that have to 'get hold' of the suspect once we have located them.

In addition. – The Redhill helicopter was:

1st at scene at the terrorism tragedy at Westminster Bridge.

2nd on scene at the terrible scene of Grenfell Tower.

Early on scene at Parsons Green tube attack.

Played a major part in the London Bridge attack response.

And involved daily in the rise of moped enabled robberies – let alone the critical part played in firearms incidents, public order situations and pursuit management."

The above information is a significant and impressive body of achievement that adds tangible value to local residents in terms of security and confidence.

This fact appears to be completely disregarded within the current proposal to develop Redhill Aerodrome. NPAS have not been approached regarding the current proposals which, if successful, will displace them from Redhill entirely.

Currently the nearest NPAS bases to Redhill are situated at NPAS London (Epping Forest) and RAF Benson in Oxfordshire.

KSS Air Ambulance

The Kent, Surrey & Sussex Air Ambulance Trust (KSSAAT) is a registered charity dating back to 1989 and exists to relieve sick and injured people in South East England and surrounding areas by providing a Helicopter Emergency Medical Service (HEMS) and Air Ambulance service for the benefit of the community.

KSSAAT now operate 24 hours a day, providing a Helicopter Emergency Medical Service (HEMS), assisting the most critically ill and injured people in the region and responding to patients who have suffered trauma or serious medical emergencies.

The KSSAAT base at Redhill became the first air ambulance service in the UK to provide a Helicopter Emergency Medical Service 24 hours a day. This service commenced at Redhill as the base at Marden was not configured for 24/7 operations. The night operation was initially introduced on a trial basis from the end of September 2013.

Following a sudden accident or acute medical illness, some patients cannot wait to be transported to hospital for emergency medical care and need medical intervention at scene that is beyond the current skill set of paramedics in the United Kingdom. Examples include emergency anaesthesia, administration of blood products or emergency chest surgery procedures.

The time window for undertaking these procedures is small – with every minute that passes the benefit of these interventions decreases. Just a few minutes of a trauma patient having a low oxygen level or low blood pressure can not only make the difference between life and death, but also the difference between the patient's brain recovering to a normal level of function or requiring permanent nursing care.

Recent research has highlighted that for unconscious patients, the sooner they are placed into a medical coma, the better their chances of returning to normal living. A delay of just a few minutes can be life-changing. In order to deliver these life-changing medical interventions at the earliest opportunity requires advanced care at scene delivered by an experienced doctor/paramedic team fully conversant with pre-hospital procedures.

These medical interventions can normally only take place in certain hospitals and the time taken for patient transport, diagnosis and appropriate decision-making can be detrimental to their outcome

Providing hospital-level care at scene not only saves lives but also improves the quality of patients' lives – allowing them to return home to their families and continue to work.

KSSAAT is a long established and experienced provider of just such care for victims of major trauma or severe medical emergency. They are also engaged in innovative and pioneering work to further improve outcomes for patients

Since then, the Redhill based helicopter has been dispatched to over 2,600 missions at night meaning the life-saving intervention they can bring to a patient is available to the people of Kent, Surrey & Sussex day or night, 365 days a year.

One of the conclusions of the 2 year night operation trial showed that the trial cases were widely distributed and given the size of the region and spread of the population the most effective means for a single Enhanced Care Team (ECT) to reach patients, in a reasonable time frame, would be by aircraft delivery to scene operating from a base as centrally located as possible. The base at Redhill is ideally placed to continue to fulfil this role.

ISSUE 50: Both of these vital emergency services could be lost at this location. This is a significant concern for local residents.

Existing Landscape

Redhill Aerodrome lies within a landscape that is accepted by all to be pleasant undulating countryside contained entirely within the Green Belt. It has undergone very few changes in the last 40-50 years and has an open grass field aspect that blends into the surrounding rural area.

The land was formally designated by Tandridge District Council as an area of Local Landscape Significance

The very nature of the current operational arrangements with the existing grass runways means that the Aerodrome enjoys a seamless visual relationship with the surrounding countryside.

Extract from 2014 Redhill Aerodrome Public Inquiry Appeal
Appeal Decisions APP/M3645/A/13/2202134, APP/L3625/A/13/2202137
Inspector – Diane Lewis.

Landscape character and visual amenity

31. In the Framework a core planning principle is to take account of the different roles and character of different areas, protecting the Green Belts around the main urban areas, recognising the intrinsic character and beauty of the countryside. Development should respond to local character and history and reinforce local distinctiveness.

Similar objectives are reflected in the Tandridge District Core Strategy. Policy CSP 18 requires new development to have regard to landscape features and to the topography of the site and Policy CSP 21 requires development to conserve landscape character. The Aerodrome is not subject to any landscape designation.

32. *The landscape within a 3 km radius of the Aerodrome (the identified zone of influence) has a gently undulating topography forming low raised areas and very shallow valleys. A number of small streams and brooks generally run east to west between two ridgelines. The field pattern is irregular with many tree lined boundaries.*

The localised blocks of woodland, some of which are designated as Ancient Woodland, and mature hedgerows combine to give a wooded character. Expansive views are possible but visibility is also limited by the topography and vegetation cover.

The nearest settlements to the Aerodrome are South Nutfield to the north east and Whitebushes and Salfords to the west. Sporadic residential properties and farmsteads are found along the network of rural roads and lanes. Landscape sensitivity has been assessed as medium-high.

The relative quiet of the rural surroundings is affected by noise disturbance in the form of the continuous background traffic noise from the M23, aircraft activity at the Aerodrome and Gatwick overflights. Tranquillity is not an identified key landscape characteristic.

33. *The Aerodrome has a different character to the more typical Wealden landscape around it. A distinctive feature is the open areas of grassland extending over a wide area.*

The group of hangars and office buildings and the features of the airfield, such as the control tower, taxiways and parked aircraft identify the open land as being part of an Aerodrome.

The extensive open green space and the rural edge with wooded boundaries make a positive contribution to the rural landscape, even though the Aerodrome landscape is not of particularly good quality. The sensitivity of the site was assessed as medium in the ES.

36. *Drawing all these considerations together, the proposal would adversely affect the appearance and character of the Aerodrome within its landscape setting. Landscape character would not be conserved, contrary to Policy CSP 21. Referring to the Framework, local distinctiveness would not be reinforced. I attach moderate weight to the harm.*

ISSUE 51: In 2014 an independent Planning Inspector wrote: *"Development should respond to local character and history and reinforce local distinctiveness."* Building 8000 houses at RA would not achieve this.

ISSUE 52: The Inspector also designated the landscape at RA as: *Landscape sensitivity has been assessed as medium-high.*

Settlement Hierarchy

The settlement hierarchy is a key part of any new Local Plan evidence base. One of the primary principles of national policy is an understanding of the different roles and character of different areas.

This knowledge helps to define the role and function of each of the existing settlements promoting sustainable communities by identifying

and providing the supporting infrastructure. This enables growth to be directed to those areas that are most sustainable in terms of the services and facilities they offer.

This is the central aim of national planning policy.

It is known that Nutfield Parish Council submitted incorrect information when the Settlement Hierarchy was originally undertaken. No confirmation has been provided by TDC that South Nutfield has subsequently been assessed on the correct basis. This may result in a distortion of the existing infrastructure considered to exist causing an inaccurate view of how the potential GV would interact with South Nutfield.

ISSUE 53: Has South Nutfield been correctly assessed regarding Settlement Hierarchy?

Safeguarded Land

The NPPF sets out that when amending Green Belt boundaries regard should be given to their intended permanence. This will enable them to endure well beyond the plan period. In doing so, sites can be safeguarded in order to meet longer-term development needs.

Safeguarded land is therefore safeguarded for future development, not from development.

The NPPF states at paragraph 85 (bullet 3):

'where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period'.

The NPPF is therefore explicit that safeguarded land should be on the edge of the urban area. This is consistent with the fundamental aim of Green Belt policy, which is to prevent urban sprawl.

Safeguarded land is required in order to ensure that, once amended, Green Belt boundaries need not be reviewed at the end of every plan period. It therefore adds certainty and is consistent with their intended permanence.

However, given the nature of Tandridge District and the extent to which the existing Green Belt constraints limit development opportunities, we consider that safeguarding is not appropriate for the Redhill Aerodrome site.

In order to be consistent with the NPPF, any safeguarded land would need to be on the edge of an existing Tandridge urban area and would need to be of a sufficient scale to negate the need for a Green Belt review until well beyond the plan period.

ISSUE 54: The RA site is not on the edge of an existing Tandridge urban area which means it should not be considered available to be safeguarded for future development.

Existing South Nutfield School

We approached the local primary school on Friday 6th October 2017 so that we could provide the most recent information. The school, Nutfield Church (CE) Primary School, has been established for nearly 50 years and is situated in Mid Street, South Nutfield. The RA site would be within the catchment area of this school.

The school caters for children between the age groups of Reception class to year 6 when they transfer to Secondary education. It is located within its own substantial grounds and is considered locally as a traditional rural village school catering primarily for the children who live within South Nutfield.

Currently the school is at capacity in the youngest 3 age groups (reception to Year 2), and a waiting list is in operation. In practice this has been the case for many years. These year groups are capped by statute at a maximum of 30 per class. Currently some vacancies exist in the upper age groups and presently the school role numbers 200. The maximum number of pupils that could be accommodated is 210.

It would be impossible for this school to accommodate children of any significant number during any transitional period between house building commencing at RA and the first Primary School being commissioned. Thakeham Homes are silent on this issue.

ISSUE 55: No account has been taken of how education would be provided during the transitional period which is likely to last for up to 10 years.

Biodiversity

It is noteworthy that the curtilage of many airfields is now being recognised as an important 'open green space' by many Local Planning Authorities and there is increasing evidence from local nature and environmental surveys that airfields are increasingly important as a low-insecticide, low-herbicide, sanctuary for plants, insects and associated wildlife.

The Aerodrome has is surrounded by very well established hedgerows and it is known that Great Crested Newts and other protected species inhabit this area.

Part of the Redhill Aerodrome site encompasses the River Mole Biodiversity Opportunity Area (BOA). The entire aerodrome site is within the Lower Greensand BOA as categorised by the Surrey Nature Partnership.

Ancient Woodland

Protection of Ancient Woodland aligns with NPPF (paragraph 118), which accords a high level of protection to Ancient Woodland unless exceptional circumstances can be demonstrated.

Conclusion

When building new housing and considering new development we have a duty to future generations not to leave them a toxic legacy.

This duty includes, but is not limited to, the loss of green fields, added flood risk, additional nitrogen oxide emissions and increasing traffic congestion. We must ensure we meet the needs of those at the bottom of the housing ladder.

If we need to build then we must ensure we only build in sustainable and accessible locations. Development, should by design, enhance and improve the immediate surroundings and not create a negative imprint on existing adjacent communities.

Redhill Aerodrome does not fulfil this basic criteria. It fails in virtually every aspect if examined pragmatically.

We suggest that development at RA is impractical both logistically and legislatively. We strongly advise TDC not to select Redhill Aerodrome as their preferred option as a new Tandridge Garden Village.

A Garden Village at Redhill Aerodrome has not been proven to be viable, can't be delivered within an acceptable time frame and so will fail to fulfil the objective sought by TDC to provide a Garden Village within the district that will benefit the majority of its existing and/or new residents.

Keep Redhill Airfield Green

APPENDIX 1

Local Roads Photographs

**Many of the local roads surrounding Redhill
Aerodrome are height or width restricted.
Some are constrained by both height and width.**

**Appended are photographs that show where these
restrictions exist.**

**We are grateful for the help of our friends
"The Garden Village People"
who have assisting us to demonstrate these issues.**



To help highlight the complete inadequacy of the existing narrow rural lanes that surround Redhill Aerodrome we enlisted the help of some new friends.

Temporarily and aptly renamed "The Garden Village People" the lads have kindly helped us to demonstrate how the narrow pinch points, and the height restricted bridges, will render the proposed development at RA virtually impossible to access.

This is especially true during the very lengthy construction period.

As we gave them a lift back to the YMCA, where they were staying, the lads commented:

"We don't normally get involved in Local Plan Consultations, but when we heard about another ridiculous plan to develop Redhill Aerodrome we had to "Go West" and see it for ourselves"

We were disappointed to see them go but Felipe (the Native American) told us:

"Young man there's no need to feel down as I think I can safely say that as a band we would never consider building a Garden Village here. We will leave no Stone unturned to fight this".

Wise words guys !!



Coopers Hill Road Rail Bridge
Height – 12' 0"
Minimum width – 18' 0"



Mid Street Rail Bridge
Height – 11' 0"
Minimum width – 11' 0"



Mid Street Rail Bridge 2



Egg Arch Rail Bridge, Clay Lane
Height – 11' 0"
Minimum width – 18' 0"



**Masons Bridge Road Stream Bridge
Minimum width – 10' 6"**



Bower Hill Lane Rail Bridge
Height – 12' 6"
Minimum width – 18' 0"



Crab Hill Lane Stream Bridge
Minimum width – 12' 0"