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8 October 2017

Garden Village Sites – Consultation Response

Nutfield Conservation Society (NCS) is a voluntary organisation based in Nutfield Parish. The majority of our members are resident in the local authority areas of Tandridge (TDC) and the borders of Reigate & Banstead (RBBC)

We have a number of environmentally based interests, in particular the protection of Green Belt.

NCS has a place on the Redhill Aerodrome Consultative Committee. We have also submitted responses to the Local Plan consultations to date.

We oppose development that will unnecessarily reduce the Green Belt and undermine its purposes in and around the aerodrome site

Please note that, as a local conservation society, we do not consider it appropriate to comment on other areas or sites. Our comments in this consultation will be restricted to The Redhill Aerodrome site.

However, our lack of comment regarding any of the other sites should not be interpreted to infer we support development at those sites, nor support for the concept of a “garden village”.

General Observations

1. In advance of adoption of The ‘TDC Preferred Strategy’, NCS made representations to Council regarding the inclusion of Redhill Aerodrome as a possible site to consider for a ‘Garden Village’ - refer to Appendix 1 - [NCS letter 25 July – Redhill Aerodrome Garden Village Deliverability](#). Other representations have included our concern that adoption of the Garden Village strategy was, at the least, premature. Council had not identified a site compliant to fulfil the objectives of a Garden Village. We are concerned that adoption of a strategy, in the absence of clear evidence that a suitable site is actually available, places pressure on Council to select a site that may not fully merit selection. We are cognisant of the unique situation TDC is in being a small, rural, lower tier authority with a high percentage (94%) of green belt.
2. The aerodrome site is inappropriate for development as a Garden Village for varied reasons on which we have commented below.
3. The complex process of building a large scale development and infrastructure for schools, medical centres etc. is exacerbated in the case of the aerodrome site due to the additional complications of:
 - Duty to co-operate
 - Development of a new motorway junction/ link road
 - Existing local road upgrades
 - Flooding and flood attenuation issues
 - Funding for all road projects and infrastructures
 - Land acquisition purchase/options and associated funding.

Individually these elements are extremely intricate, necessitating multi-agency liaison. However, when coupled with complicated engineering and the apparent scant consideration paid by the developers on some aspects, the prospect of delay and escalating costs is a reality. The compound complexity makes deliverability a major concern.

(Table 5 Duty to Cooperate Statement Update)

4. Council have stated “*without guarantees we will not allow the development to go ahead*” and NCS endorse this firm, logical stance. TDC have advised the site selection will take place in 2017 and it is unlikely the proposer will be able to provide deliverability guarantees (assuming that will ever be possible) in advance of the selection timescale. This leaves open the alarming possibility that, if the site is selected and the proposers fail to guarantee and then deliver the stated homes plus infrastructure, then the Local Plan will be in ruins.
(TDC Local Plan Garden Villages Consultation *Get the Facts* document)

Green Belt considerations

5. TDC examined the Redhill Aerodrome site in 2015 in its Green Belt Review. The aerodrome is included in Parcel GBA 029, and forms a large part of this designation. It should be noted that the Green Belt around London is at its thinnest in this vicinity and is thus particularly vulnerable to local loss and degradation (http://londongreenbeltcouncil.org.uk/threats_map). TDC concluded that the aerodrome and the land around it contribute to three purposes of the Green Belt, as defined in the NPPF summarised below:
- i) Effective in checking sprawl: “*The Green Belt to the western edge of this strategic area has an important role to play to prevent the sprawl of these large built up settlements (Redhill and Merstham) creeping into Tandridge District.*”
The Developer’s submission says that the site makes no contribution to the Green Belt as it does not adjoin the main urban areas of Redhill. This conveniently ignores the fact that the site is almost as close to the settlements of Salfords and Whitebushes (suburban extensions to Redhill), as it is to South Nutfield.
 - ii) Preventing coalescence: “*The parcel ... plays a role in separating Redhill with South Nutfield. These settlements are further separated by distance, woodland and water bodies in the parcel. Therefore the parcel is effective at serving this purpose.*”
The Developer once again says that the site makes no contribution to this important purpose. They say merely: “*Through master planning and landscape design, the separation of the proposed development from South Nutfield will be maintained.*” This separation will consist of “buffering” described as a belt of trees and green space at best a couple of hundred metres wide, in places much narrower. Again, no mention is made of Salfords and Whitebushes, and the coalescence to these areas.
 - iii) Preventing encroachment:
“*The parcel is generally considered to play a strong role in assisting the safeguarding of countryside from encroachment.*”
The Developers on encroachment: it is accepted by the developer that the proposal would not safeguard the countryside from encroachment, but it is then argued that, as part of the site has been previously developed, the relative impact of this purpose is reduced. This is disingenuous: the largest part of the site by far is Green Field within the Green Belt; only the relatively small Employment Area can be considered “developed”.
6. Both TDC and the Developer have failed to mention the further danger of coalescence in this area. Reigate and Banstead Council have identified in their Local Plan land to the north of Horley, (200 potential new homes) and land to the East of Redhill (500 – 700) as suitable for Urban Extensions. These areas are both Green Belt, and each only a couple of kilometres distant from the Aerodrome site. In addition, Reigate and Banstead have given permission for 70 homes on a further Green Belt site at Philanthropic Road, just to the north of the Aerodrome site. The Metropolitan Green Belt is extremely narrow here, when viewed as a whole, and is under threat from all directions in this location. The proposed housing scheme would inevitably lead to settlement coalescence, and undermine one of its principles – ‘openness’ – the issue that was at the heart of the 2014 Supreme Court decision which ruled against the owners of Redhill Aerodrome who, at that stage, wanted to build a hard runway involving some 33,000m² of concrete which is much less than will be involved in the large housing development now proposed.

7. In the Consultation document, TDC says that: *"The Green Belt boundary would only be amended in locations where the Green Belt purposes are not served, and where exceptional circumstances are demonstrated."* The Green Belt at Redhill Aerodrome serves three of the five purposes, as TDC itself concludes.
8. The Green Belt has not been mentioned as a constraint to the development of this site and the statement is made *"Existing policy constraints including Green Belt have not been applied to the suitability assessment for broad locations and, along with infrastructure considerations, is a matter for the wider Local Plan process"*. However, the "wider Local Plan process" has NOT considered Green Belt as a constraint to development and has NOT considered the basic infrastructure that would be required for such a huge development at Redhill Aerodrome.
9. The current pleasant rural area would be degraded by a loss of "openness" during daylight hours and by a significant increase in light pollution at night. Hence the Aerodrome would be visually more intrusive during both day and night thus diminishing residential amenity and harming the area which has long been enjoyed by the community.
10. Another principle of the Green Belt is its permanence. Reigate and Banstead adopted their Local Plan in 2014 and appears not to come up for review until 2027. The land at Redhill Aerodrome is shown as Green Belt in their Plan.
The NPPF guidance on Green Belt boundaries is explicit: *"Once established Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."* It follows that Reigate and Banstead cannot consider altering the green belt status of Redhill Aerodrome until 2027 at the earliest.
This means it would be near impossible for houses to be delivered within the timescale of the TDC Local Plan. TDC recognised this in their Sites Consultation 2016 when they considered the Redhill Aerodrome site and commented: *"The main issue is that the majority of the land is within the Borough of Reigate and Banstead who have discounted this area for development."*

Safeguarding

11. TDC may consider safeguarding the aerodrome site. NPPF is clear that any amendment to Green Belt boundaries should be with a view to their intended permanence to enable endurance beyond the plan period. NPPF is similarly clear that safeguarded land must be on the edge of an urban area specifically it states *'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'*.
(NPPF para.85)
The aerodrome site is entirely within the Green Belt and not adjacent to or even near any urban area within Tandridge District. It clearly does not conform to the NPPF criteria to permit safeguarding by TDC.

Areas of Outstanding Natural Beauty (AONB)

12. The area on Nutfield Ridge, with a central view of the Aerodrome site, is a candidate area for Surrey Hills AONB - and Natural England is currently conducting the boundary review. In addition, land north of the railway line, and barely half a kilometre from the edge of the site, has an AGLV designation. Most of the aerodrome site is in full view from the footpath running high along the Ridge. It is also visible from the Greensand Way passing to the north of the site.
No amount of "buffering" could conceal such a sizeable development of 8000 or more houses, associated infrastructure, a new motorway junction and several kilometres of link roads. Major elevated earthworks involved in the proposed development would have a significant impact on visual considerations.
This is recognised in the TDC Landscape Assessment July 2017: *"The outlook from the Greensand Way and the setting to a candidate area of the AONB to the north is a constraint to development....The combination of South Nutfield and the new settlement is likely to have a significant impact on the rural outlook of the Greensand Way and the candidate area for the AONB."*

13. The Surrey Hills AONB Management Plan 2014 -19, endorsed by TDC has, as a management aim: *“Significant viewpoints will be identified, conserved and enhanced.”* (RT3: Management Plan Policy).
In addition, existing roads connecting the proposed development to the strategic A25 in Nutfield would have to pass directly through the candidate AONB area. These are Sandy Lane and Fullers Wood Lane. There would be a huge increase in traffic volume, and the junctions with the A25 for both roads would become very difficult, unsafe and likely have long queues.
Surrey Hills Management Plan states: *“Major transport schemes will have due regard to the national AONB designation and measures will be taken to reduce any impact on the Surrey Hills landscape”*.
(TT4: Management Plan Policy).
The NPPF also requires *“great weight to be given to conserving landscape and scenic beauty ... in AONBs”*
14. The Surrey Hills Management Plan concludes with its Land Use policy: *“In seeking to identify in development plans, sufficient land to meet Councils’ future housing requirements, any proposed housing land allocation directly, or possibly indirectly, impacting upon the AONB should be avoided and shown to be a last resort.”* (Land Use and Planning: Management Plan Policy).
15. The Developers comment on AONBs in their December 2016 document that the *“The Surrey Hills of Outstanding Natural Beauty is approx 3.5km north of the site.”* This conveniently omits the fact that the ridge immediately above the aerodrome (with panoramic views of the site) is a candidate area for AONB status. It is therefore wrong for the Developer to state that *“the housing development would protect more sensitive ecology and environmental designations in the rest of the District.”*

Landscape

16. TDC in its 2017 Landscape Survey for the site says: *“The rural setting of South Nutfield is likely to be affected by the potential development area.”* It adds: *“Land between the airfield and South Nutfield could be used for informal recreation as part of a country park so as to maintain the rural and undeveloped character of the land.”*
A country park providing genuine separation would have to be considerably wider than the “buffer” shown on the Developer’s Masterplan. An often forgotten fact (by planners/developers) is that trees lose leaves for six months of the year making areas of higher visibility during autumn/winter. It would be hard to disguise a huge development of 8000 houses in the landscape and the rural setting of South Nutfield would be destroyed by construction on this scale.
17. In addition, there would be increased light pollution. South Nutfield is a rural village with no street lights. A development of this type and size would be visible at night not just from South Nutfield, but from the whole length of the Greensand Ridge to Redhill, an effect exacerbated by the coalescence of communities which this scheme would bring.
18. Air pollution has already been recorded above national limits in some local hotspots and this will be an issue from the hugely increased traffic flows anticipated to result from this development, particularly around the motorway junction and spur.

Ecology and Biodiversity

19. We take issue with TDC’s Ecology appraisal, August 2017. It mentions that part of the Redhill Aerodrome site encompasses a Biodiversity Opportunity Area (BOA), namely the River Mole BOA. It fails to mention that the entire aerodrome site and well beyond it, is within the Lower Greensand BOA(ref LW07), as defined by the Surrey Nature Partnership, to which TDC is a party. This seems to be an anomaly, as TDC does recognise the Wealden Greensand BOA(ref WG11), which joins up with the northern boundary of LW07.
20. BOAs have no statutory significance and, as the name implies, are areas for opportunity to improve diversity. A key tool for this is connectivity. “Blue” connectivity is recognised in the TDC Ecology appraisal by its recognition of the River Mole BOA. But “Green” connectivity comes through the network of woodland, ancient woodland and especially hedgerows, of which there are many in the fields in and around the aerodrome site.

Hedgerows are recognised as making an important contribution to this BOA. A huge building programme for 8000 (or more) houses, construction of the associated motorway link roads cutting across the site, and the ancillary roads required would destroy rather than enhance connectivity, especially given that the building works would continue over many years.

21. TDC recognise the importance of connectivity, saying in the Appraisal: *“The hedgerow and woodland bands bordering the fields on the outer edges of the site provide good connective habitat to the wider area.”* But TDC fail to see the bigger picture - this site is Green Belt land with an opportunity to improve biodiversity, contiguous with the River Mole BOA, and the Greensand BOA which includes the Holmethorpe SNCI. A huge housing development of the size proposed would result in a fractured, not a connected, landscape.
22. Ancient woodland is also mentioned in the TDC Ecology Appraisal. One important area of ancient woodland borders the fields which the developers have chosen to use to show the motorway junction spur and potential loss of ancient woodland for the slip road construction. This would threaten large natural ponds and their inhabitants within the woodland area, including proven great crested newt colonies. The junction proposal would clearly put such a precious habitat at risk, not least from increased air pollution.
23. Important hedgerow habitats are also under threat. Just one of many threatened hedgerows has been recently surveyed. Along the Greensand Way (Footpath No 527GW) is a long stretch of ancient hedgerow which corresponds exactly to the field boundaries on the 1843 Surrey Tithe Map. This species rich hedge has numerous significant trees, among them an oak with a girth of 4.3m at a height of 1.5m and an ash, showing old coppicing, with a girth at ground level of 4.5m.
24. The fields adjoining the M23, and where the access spur and associated industrial development would potentially be located, are also evidence of a historic landscape with the hedgerow boundaries again matching those on the 1843 Tithe Map. Such trees and hedgerows, with the potential to support bats, dormice, and nesting birds among others, would be lost (surveys have not been done). So too would the ponds that support amphibians such as the great crested newt, for which there are several records in various sites around the whole proposed development area.

See also Appendix 2 – [comments from Sholto Holdsworth BSc, MSc.](#)

[Consultant entomologist at Natural History Museum, London](#)

Flooding and Flood Attenuation issues

25. Whilst the present culvert under the runway helps to cause the current flooding, the major constraint is the watercourse further downstream (Salfords Stream) and the features along the length to the A23 – this cannot be solved by works at the aerodrome site unless substantial flood storage facilities are created there or further back upstream. The substantial urbanisation of the area will result in a very significant increase in the amount and rate of surface water runoff and measures will be required by the Environment Agency to limit runoff from the developed areas to not more than the previous green field rate.

There will also be a need to recreate existing flood plain which will be lost by the development and particularly the works for the spur road. The approach again adopted by Thakeham appears to be limited at present with only a vague, limited, undeveloped strip adjacent to the watercourses and some localised flood storage ponds.
26. NCS consider that the flooding extent, risk and allied issues are a significant issue. The extent of Zone 2/3 flooding, as defined below, is shown in Appendix 3 ([Environment Agency flood website](#)). The EA plot does not differentiate between Zone 3a and Zone 3b.

Flood Zone	Definition
Zone 1 Low	Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)
Zone 2 Medium	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding. (Land shown in dark blue on the Flood Map)
Zone 3b Functional Floodplain	This zone comprises land where water has to flow or be stored in times of flood. Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. TDC has done this only in vague terms (see attached) (Not separately distinguished from Zone 3a on the Flood Map)

Housing development is considered as “more vulnerable” and thus should not be permitted in Zone 3b and only by the exemption process in Zone 3a. Essential transport and utility infrastructure is considered as “essential infrastructure” and must only be permitted by the exemption process in both Zones 3/ 3a.

<https://www.gov.uk/guidance/flood-risk-and-coastal-change#flood-zone-and-flood-risk-tables>

<https://www.gov.uk/guidance/flood-risk-assessment-in-flood-zones-2-and-3>

27. TDC have only recently allowed the Aerodrome site to be introduced into the Garden Village process for consideration and thus have not considered the strategic flood risk assessment and the exemption process for this area in its Strategic Flood Risk Assessment Further Details Report (October 2016) as for the other three proposed GV sites. Consideration of the Zone 3b area for housing would rule out much of the eastern part of the site whilst, and the more extensive Zone 3a area second issue would suggest, that the development should be elsewhere where flooding is of no or lesser concern. NCS has serious reservations about the consideration of this site for a garden village in view of the lack of inclusion of the Aerodrome in the Strategic Flood Risk Assessment by TDC and their lack of exemption considerations.
28. There is also the question of dealing with the surface runoff from the development which will be greater and quicker than the current largely greenfield rates – this will require attenuation and local storage facilities which will not be insignificant and would further reduce the development space available. The EA will also require like for like replacement of flood plain area if this is raised or the storage capacity is affected by the development and where the spur and possibly other access roads are elevated. These will further substantially reduce the space available for the development.
29. The effect of the link road, initially, at least, on an embankment in restricting flood flows and forming a potential feature to hold back surface runoff after an extreme flood needs to be assessed. Manmade and natural debris and floating vegetation will accumulate at such times leading to localised temporary storage upstream which could be significant in a very extreme event. The effects of a breach of the various ponds and lakes in the Priory Farm area which drain along the watercourse through the Aerodrome also needs to be considered. These are in cascade (i.e. the breach of one will cause flow into the next and so on). Although individually small in volume, collectively they comprise a moderate volume, and any large flows would potentially breach the steep railway embankment to the south and allow onward flow.

This is a major concern in the reservoir world and the larger reservoirs have been assessed for the impacts of a breach. Development downstream of reservoirs is specifically referred to in the second link below and discouraged, requiring additional procedures and considerations

Flooding and flood attenuation issues must be considered to be a major issue which must be addressed before the site can be properly and adequately considered further.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf

Promoter Information - Reliability

30. The promoters have presented conflicting and ambiguous information concerning the number of homes that can be accommodated and also with regard to the size of site. The original vision for the current aerodrome site was 4500 and, at an RACC meeting, Mr. Boughton (Thakeham MD) confirmed this related to land 'within the aerodrome boundary'. He qualified that the figure was likely to reduce in view of site issues such as flooding, land-take for the motorway link road and other issues.
31. Reference is then made in the consultation papers to the number then rising to 6/8000 homes and the area of the site increasing from 228 to 616 hectares. TDC indicate that this new estimate includes use of additional land outside the aerodrome perimeter and that 4000 homes would be within the TDC area of the aerodrome site.
32. In June 2017 an updated vision refers to two construction 'streams' of homes which do not relate to any of the previously advised totals. Lepus Consulting has also added that, in connection with the number of homes to be provided, *"The extent to which it would contribute to affordable housing and extra-care needs is currently unclear"*.
(Thakeham vision document, Saville Representation letter, TDC Local Plan Garden Village Consultation main document, Thakeham presentation documents, 3.5.1 Sustainability Appraisal)
33. The figure for homes information is contradictory and appears to be reactive possibly to Highways England (H.E.) comment on the size of the development it is without qualification. In order to make a meaningful Garden Village site selection Council should be satisfied they have a reasonable idea of how many homes may be delivered. We submit this cannot be achieved from the conflicting and changing information supplied by the proposers.
(Annex G Duty to Co-operate and Thakeham presentation document June 2017)
34. The first timetable presented by the promoter ran from 2017 to 2022 and beyond. This included the building of 300 homes over a two year period from 2020 to 2022 and 300+ per year onwards. During the same period in 2022, the timetable referred to work being undertaken on legal agreements and design for the motorway link.
(Redhill Aerodrome New Garden Community Vision Statement – November 2016)
35. Thakeham provided a different timetable in their June 2017 presentation to TDC, indicating the start of construction would be 2022 and completion of the road junction and primary school by 2024. Both timetables were silent regarding the planned smart motorway construction on the M23 although this has been subject to planning for several years. A reasonable expectation would be for the proposers to be aware of and account for this sizeable project which is on the same stretch of motorway as proposed for the new junction and western spur.
(Thakeham presentation document June 2017)
36. NCS now note that a *"possible commencement date 15+ years from the point of Local Plan adoption"* has been indicated by TDC.
(TDC Local Plan Garden Village Consultation main document)
37. The Tandridge Local Plan period runs to 2033 and, realistically, the adoption date is likely to be 2019 at the very earliest. The new suggested date for commencement of this development proposal will thus be beyond the Local Plan period and significantly beyond the period for delivery to begin. It does not comply with TDC's anticipated for delivery of the chosen site to commence 6 -10 years from the date of adoption of the Local Plan.
38. Adoption of the site would be perverse as it clearly rules out Councils ability to commence delivery of the appropriate quantity of homes in accordance with their own Objectively Assessed Housing Need figure within the Local Plan period.
(1.2 Garden Village Consultation Document)

Economics & Viability

39. The proposers state they will fund the building of the new motorway junction and link road - this position is confirmed in their letter dated 4th July 2017 where they state “..... confirm that we do not require any form of government grant; the junction and strategic road scheme will be entirely privately funded by the associated housing development.”
(Annex G Duty to Cooperate Statement Update)
40. The term ‘*privately funded*’ is vague. Potential funding sources via local enterprise board and other sources which access Government funds are explicitly excluded by the promoters; this includes ‘The Government Housing Infrastructure Fund’.
41. Other non-Government sources (e.g. Gatwick Diamond) are not explicitly ruled out. It is questionable whether Thakeham hold sufficient funds to draw on directly and have confirmed their intention to enter partnerships to carry out building and also presumably to obtain funding. All such sources of funding will require complex and time-consuming negotiation to arrange and such a “consortium” of funders/developers has the inherent risk of dissolving or substantially affecting delivery if any of the participants should pull out.
42. The statement ‘*will be entirely funded by the associated housing development*’ may also be interpreted as an intention to produce direct funding arising from selling the homes. Given the huge sums of capital required, such a course of action will undoubtedly require negotiation of large loans to bridge the junction delivery costs and the sale of the many homes required to fund the construction. This funding method will necessitate complex arrangement.
43. We note the Highways England letter mentions a figure of £110 million- included by the promoters for infrastructure alone, although how much of the actual cost of the junction this represents is unclear. For comparison, the planned smart motorway work on the M23 will cost £154.8 million. It is apparent the added dimension of a motorway junction and a link road (likely needing to be a dual carriageway) adds significantly to the cost, complexity and financial risk, all of which will adversely affect delivering the development.
(Annex G Duty to Cooperate Statement Update, 5.4.2 Traffic Accessibility – Assessment)
44. Council have commented “...if we have a new garden village that will pay for the infrastructure within that garden village so we are expecting a new school, health centre, improved roads not just in the garden village but in the feeder roads to that village.....” The interpretation from Council of this statement is that TDC are hoping to tap into the £2.3 billion Government Housing Infrastructure Fund.
Such funding is crucial to the aerodrome proposal.
(Councillor Statements August 2017 & September 2017)
45. The Government Housing Infrastructure Fund allows for two categories of bids for funding. TDC is a lower tier authority and as such may only make bids for Marginal Viability (Communities & Local Government Dept. Policy Paper - The Housing Infrastructure Fund Support document & Marginal Viability Bid Guide).
46. Marginal Viability bids will be assessed through a ‘one stage process. We understand that TDC submitted such a bid. However at time of drafting our response to conform to the consultation deadline we had not received a reply from TDC to our request for details of the bid.
47. Bids will be assessed and funding awards announced from **late 2017 or early in 2018**. Fund guidance states “*The Fund is available over four years from 2017/18 to 2020/21 and we will be looking for some Marginal Viability proposals that can be spent in 2017/18. All funding must be committed by March 2021*”.
48. The process is ‘bidding’: it is not an application. Bids are subject to assessment against specified criteria these include ‘*The proposal can be delivered*’. The guidance contains numerous other aspects requiring compliance. Clearly there is no guarantee of an award and deliverability is a significant concern.
49. In the case of the aerodrome the proposer’s ever changing numbers of homes preclude Council from even indicating how many homes the proposers aspire to provide. There are numerous obstacles affecting deliverability. The varying timetables offered by the proposers are recognised by TDC as being unrealistic. The lack of clarity from the proposers on such fundamental detail, their funding and deliverability undermines TDC’s ability to produce a credible business case for the site.

50. The ability to conform to the Marginal Viability proposals to spend in 2017/18 and to commit all funding by March 2021 does not appear to be achievable.
51. TDC may share our concern that the lack of clarity in the proposers funding statements indicates that some TDC sourced funding is essential. They may also share opinion that a bid for funding of the aerodrome site is doomed to failure.
52. Selection of the aerodrome site without such funding would present a major fiscal risk to delivery. Similarly to select the site while awaiting resolution of a bid would not represent sound strategy.
53. TDC acknowledge there is a surplus of larger homes in the authority area and have variously quoted the average value as £450,000 and £475,000. Average house prices nationally are eight times average earnings, but in Tandridge they are 14 times, the average earnings precluding purchase or rent by younger people and young families. Council have indicated they would like to see developers come forward with 2 bedroom houses, apartments and bungalows with an affordable element and an interest in having council and social housing. Clearly affordable housing is the requirement and The Local Plan is predicated on supplying significant quantities of realistically affordable homes. (Councillor statement+ letter August 2017 & officer information).
54. TDC's aspiration is to build affordable housing. TDC advise that the guide to 'affordable' is sale at 80% of the market value. Tandridge's average house value is high at £450,000 and, on that basis, the average affordable home will be priced at £360,000. We question the viability for the promoters to make sufficient profit at these levels to recover the capital costs involved with a motorway junction, road infrastructure, schools and health centre infrastructure costs which the promoters say they will privately fund. (TDC officer information)
55. NCS challenge the economics of this project. A multi-million pound direct investment by the proposers will undermine the viability of building the homes and add to the building cost of each home. Council's desired mix is the least attractive to developers to maximise profit and offset the huge additional costs necessary to deliver the junction and infrastructure. We anticipate this will lead the promoters at a late stage even post-commencement of construction to negotiate a reduction of numbers of affordable homes and renegotiate an increased proportion of market homes, particularly high-end and thereby undermine Councils desired mix of homes and aspirations.
56. We are particularly concerned about the possible reliance on the sale of homes to fund the junction and the infrastructure which introduces another risk factor for delivery. Council may consider it would be imprudent to select this site with such potential financial risks.
57. At a recent RACC meeting, Thakeham stated that they consider £150m will be sufficient to cover all the infrastructure costs beyond those immediately associated with the individual developments whereas preliminary assessments indicate this sum will be far exceeded. At a subsequent presentation to Horne Parish Council the figure of £250 million was offered. Clearly the promoters do not know themselves the real costs involved. This shows their apparent lack of appreciation in accurately assessing the constraints and site requirements for a development on this scale.
58. Three important fundamental components of the proposal for this site are the volume of homes, area of the site and delivery times all of which have, at this early stage, now significantly changed. The funding source for the new junction at the very least lacks transparency, is supremely optimistic, and places an additional and complicated issue for the promoters to address.
59. NCS consider information provided by the developer (Thakeham) demonstrates an unrealistic, unreliable and inconsistent approach which is solely self-serving in order to keep the project under consideration.
60. We also speculate whether the present owners of the aerodrome will choose to sell the project if the site is selected which would introduce a further complication to delivery. In order to make and validate their selection of a site, Council must be confident of the integrity and reliability of information on what is to be delivered, the time frames involved and the level of financial risk to the developers.

Traffic

61. Development of the aerodrome with 6/8000 or 9500 homes will generate a massive increase of vehicles on local roads which are already under pressure and over capacity. There are also major concerns regarding vehicular access to the site.
62. The latest figures (2015/16) indicate an increase in one year of 600,000 cars on roads in England. The largest rise over recent years has been in the South East of England with the region also having the most cars per region.
(Department of Transport)
63. National statistics also confirm the number of cars per household in the UK is rising while the number of households with no vehicles is falling.
(Statista)
64. Vehicle ownership is nationally the highest in the South East region. On a Surrey and the South East basis, Tandridge has the second lowest % of 'households with zero vehicles' in Surrey and is 7% below the South East average. Tandridge district has the third highest % of 'two or more vehicles per household' in Surrey and is a massive 15.5% above the South East average.
(Dft, RAC Foundation, National Census 2011)
65. This high volume of vehicle ownership in Tandridge will be significantly increased by development of the aerodrome site. The varying figures for homes quoted by the promoters (4500, 6/8000 etc) produce differing results in calculating the increase in vehicles the site will produce.
66. Based on the 8000 homes figure, the site will produce a minimum of 7,050 vehicles (see note 1). This represents a massive increase from the current number of 825 vehicles recorded for in the 1100 households currently in Nutfield Parish—i.e. an additional 6,225 vehicles on local roads.

Note 1: calculation based on 2011 Census data citing 'one vehicle' and '*two or more vehicles per household*'. Only the figures of 1 and 2 vehicles per household have been considered thus not accounting for any household having more than 2 vehicles.
67. The increase of vehicles relates only to the extra numbers arising directly from the development and does not account for projections of annual increases in vehicle ownership or vehicles from Tandridge and adjacent local authority areas that currently use the local road infrastructure.
68. The existing local road infrastructure is already under pressure and, at certain locations on local roads, is over capacity with a number of specific inadequacies, including narrowness and sharp turns. The majority do not have a footway. These were exposed and reported on in detail by SCC Highway in connection with a planning application at the aerodrome 2012- 2014.
(Planning Application P/12/10377/F)
69. SCC summed up the 2012/14 situation as follows: *"...following the highway authority's assessment of the data, it is concluded that the development would be unacceptable without appropriate mitigation..."*
70. Significantly SCC, in relation to the current proposal, specifically indicated the A23 Horley Road/Three Arch Road junction continues to present a major traffic problem. SCC modelling in September 2016 identified the need for another lane on the A23.
(5.5.2 Transport Accessibility – Assessment, Appendix C Duty to Cooperate)
71. The local road network was inadequate to support the 2012/14 application which, in vehicle numbers and movements, is dwarfed by the increases that will arise from this proposal. The mitigation measures essential to the 2012 project were not implemented nothing has changed and **the current local road infrastructure remains under pressure and 'over capacity'**.
72. SCC estimate that, during the AM peak hours, this aerodrome development will generate 3500 to 4000 trips arrivals and departures. These trips will of course be additional to the non-development generated traffic already present and be further exacerbated by the '*large amount of through traffic unrelated to the development expected to be attracted to use this new link between the A23 and M23*' as asserted by SCC.
(5.2.1 & 5.5.1 Transport Accessibility – Assessment)

73. Surrey Council estimates of vehicle movements indicate significant increases and are based on the original vision of 4500 homes. The 6-8000 version and/or the 9500 version will significantly increase such movements.
74. The proposers (and TDC) recognise the major problems regarding access and local road use that will prevail from the proposed development .The main solution offered is the provision of a new motorway junction and link road from the M23 direct to the homes which will terminate near East Surrey Hospital. The promoters are clear that, without the motorway link, the plan will fail. This is endorsed by SCC who state: *"Given the existing issues on the A23, a new junction on the M23 would be a prerequisite for this development"*.(5.5.1Transport Accessibility – Assessment)
75. NCS submit that the new junction and link road will not solve either the local traffic or access issues. The latest plan from the promoters also includes several site access routes via existing local roads which will inevitably be used as 'short-cuts' causing increased traffic volumes and safety issues on the local road infrastructure.
76. SCC confirms this situation and state *"The majority of existing roads in the vicinity of the site are minor, some with sharp turns and poor visibility. They are therefore not suitable for significantly increased traffic flow. It is expected that, along with the new link road, further improvements would be required to existing roads to both ensure that they are suitable for the volumes of traffic involved."*
(5.5.3 Transport Accessibility – Assessment)
77. SCC identify that *"The design of any reconfigured junction of A23 Horley Road with Three Arch Road is crucial to the feasibility of the development. This junction and its approaches already suffer from severe congestion. The existing tunnel under the railway on Three Arch Road would also need significant improvements to accommodate the additional traffic. This would need to be designed in collaboration with Network Rail"*.
(5.5.2 Transport Accessibility – Assessment)
78. SCC further state if *"significantly increased volumes of traffic are expected on rural roads this would likely result in more collisions....."* They also cite particular rural roads with a history of accidents and state *"which would likely be exacerbated by any additional traffic as a result of this development"*. (5.6.1 Transport Accessibility – Assessment)
79. The map (Appendix 4 <http://www.crashmap.co.uk/Search>) is included to provide an illustration of the road accident profile of the existing local roads near to the indicated intersection with the A23. The information is drawn from official records emanating from police reports they reflect only **injury** accidents that have been allocated a reference number issued by the police.
80. Non-injury road accidents attended by the police are frequently not allocated a reference number and of course the police do not attend and are not made aware of all non-injury road accidents. Such incidents do not therefore appear within road accident statistics. The instances of such incidents on the existing local roads are significantly higher than the recorded data indicates.
81. The nature of the local narrow roads with an absence of footways and including sharp bends/ twisting stretches presents serious implications for road safety. In particular pedestrians and cyclists (which the promoters allege will increase) will be at risk. The provision of new cycle ways and footways will not prevent road use. There is insufficient land availability on the existing roads for cycle lanes or footways to be added. No provision is offered to mitigate the safety issues on the existing roads and in particular during the earlier periods of phased development when little of the proposed mitigation will be constructed.
82. The link road route will ultimately decant traffic to the vicinity of Three Arch Road and to the A23 junction. Access to the existing local road network will be facilitated and readily used by development generated traffic (acknowledged by SCC). Council anticipate improvements to local *feeder roads* will result and indeed are essential. Any potential benefits accruing will be to the sole advantage of RBBC area. No benefit for the wider Tandridge communities will arise. In fact, the disadvantages arising from traffic increases will be borne by TDC settlements in the immediate vicinity (5.3.3 Transport Accessibility – Assessment)

83. NCS acknowledge that a reduction of air/noise pollution will arise in consequence of the closure of the aerodrome. However the Lepus Consultation and SCC both confirm that road traffic movements will increase substantially. Coupled with reliance on personal car use, the Lepus report concludes that air quality will be impacted in places such as South Nutfield and Redhill. The promoters anticipate emergency service helicopter flying will continue, so the net effect will therefore be a substantial increase of both noise and air pollution arising from the proposed development. The potential for increased pollution, major traffic disruption, delay and safety to the local road infrastructure as a result of a development on the scale proposed is apparent.
(5.2.1 & 5.5.1 Transport Accessibility – Assessment, 3.5.11 Sustainability Appraisal)

Nutfield Conservation Society felt strongly about the road safety implications and commissioned a report from Sarah Simpson of Royal HaskoningDHV in connection with the traffic impact which the proposed Redhill Aerodrome development will have on the area. This report will be sent direct to Tandridge District Council and represent additional observations on that subject.

See also Appendix 5 – [Local resident view regarding impact of development on local roads](#)

Proposed Traffic Mitigation

84. The promoters advance the notion of additional road traffic mitigation by way of potential for public transport (rail and bus) use and enhancement of cycle paths and footways to reach local services, amenities and main shops.
85. Limited bus services exist in peripheral areas such as South Nutfield and Whitebushes and there are none currently within the potential development site. Whilst NCS note the possibility of extending these services, this should be coupled with the relentless rise in vehicle ownership leading to a decline in 'bus use' which has fallen by two thirds over a 6 year period - accompanied by cuts in funding for supported services and rising fares.(CBT, BBC)
86. Three local railway stations are accessible from the aerodrome site by way of the existing local road network and a fourth (Redhill Station) is similarly accessible entirely by local minor roads or via the A23 at Three Arch Road. In relation to cycle path and footway links, the SCC comment is significant: *"If these links are not incorporated into the development it is likely that residents would use the car to access rail stations and may decide to travel further to a station with a better service, more car parking or lower cost fares. This would have a negative impact both in terms of additional vehicles on the network and pressure on parking at the stations".* (5.3.3 Transport Accessibility – Assessment)
87. Tandridge is high in vehicle ownership/use. A private vehicle travel culture predominates and there is no evidence to indicate this would significantly change with the provision of cycle paths and footways. The mere provision of the facilities cannot guarantee actual use. NCS contend that vehicle use will continue to predominate and any such use of those provisions that may occur will be ineffective to significantly reduce the effects of the increase in traffic on local roads arising from the development.
88. This is supported by statements in the Sustainability Appraisal *"given the relatively limited local access to sustainable transport modes, it is considered likely that residents of the potential Garden Village location would rely heavily on personal car use".*(3.5.7 Sustainability Appraisal)
89. The relative inaccessibility and distances to the four railway stations, coupled with the predominance of vehicle culture, will not result in drivers reverting to cycling and or walking. Any such use of footway and cycle paths that may occur will not significantly mitigate the use of private motor vehicles which is expected to increase substantially on the already congested local roads.

Proposed Motorway Junction and Link Road

90. Delivery of the proposal is reliant on the central core of a new motorway junction and link road which is intrinsically linked to the traffic issues identified. The developers (Thakeham) made an unequivocal statement at the RAAC EGM in December 2016 that the scheme was not viable without the motorway link and spur road included. NCS has serious doubts that this core ingredient can be delivered at all and in, any circumstance, within the Local Plan period.
91. We have noted the considerable alteration in commencement dates of the proposal and, in the absence of any guarantee of any further changes, we can only comment based on the various time scales available during the consultation. To avoid repetition of comments on the new commencement date (*15+ years from the point of Local Plan adoption*) we refer you to paragraphs 11/12 of this response and reaffirm the main point that a commencement date beyond the Local Plan period would be counterproductive to delivery of homes within the that period.
92. The proposer's vision statement includes reference to feasibility for a new link road and M23 motorway junction to take place in 2017-2018. The proposers have not advanced feasibility to an essential point of assurance sufficient to enable Council to select the site with confidence that the junction and link can be delivered within the Local Plan period, or indeed delivered at all.
93. The original delivery timetable suggested 2020-21 as a start-time on site and the building of 300 dwellings over a two year period. During the same period, it was proposed legal agreements and further detailed design would be undertaken regarding the link road and junction. The building schedule was stated to continue at a rate of 300+ from 2022. The M23 new junction construction period was ambitiously suggested to commence in 2022 (subject to satisfactory legal agreements and designs), which would have been two years after home building would have commenced.
94. In June 2017 an amended timetable was presented which appears equally impossible to deliver within the projected time scales and further demonstrates the unreliability of the promoters.
95. This unreliability and fanciful thinking may be seen in Thakeham's letter of 4th July 2017 when they wrote indicating an intention to "*engage with Highways England (HE) to establish how the proposed junction arrangement could be accommodated with their Smart Motorway programme*". The Smart motorway project is well advanced and due to commence in March 2018 and it is beyond credibility that the proposers should consider the project would be rescheduled to accommodate their plans. TDC will recall that the proposers had of course neglected to mention the Smart Motorway project in their timetables.
96. The promoter's timetables do not stand up to scrutiny in that delivery of the new junction would take longer than stated or, worse found to be non-deliverable. The concept of commencing construction of homes before the design and legal agreements are even completed shows a cavalier attitude with flawed judgement and is a further demonstration of unreliability.
97. DfT Circular 02/2013 is The National Guidance that sets out the way in which Highways England (HE) engages with the development industry to deliver sustainable development. The HE primary function is to safeguard the purpose of the strategic road network.
98. Paragraphs 37 – 44 *Access to the Strategic Road Network* contains criteria to be complied with in order to deliver a new junction. The criteria in this individual section place numerous and onerous responsibilities on the proposer to prove compliance with all requirements of the regulations.
99. The DfT regulations make it clear that a new motorway junction cannot be provided on the simple basis of facilitating a new housing development. Proposers must establish "*that such new infrastructure is essential for the delivery of strategic planned growth.....*"
100. The regulations are further qualified "*Where the strategic growth test cannot be met there will be no additional junctions with, or direct means of access to, motorways and other routes of near motorway standard....*"
101. Understandably at this point no case for '*delivery of strategic planned growth*' has been presented.

102. The only the potential advantage mentioned by the proposers is for improved access to East Surrey Hospital. However, this does not qualify as '*strategic planned growth*'. NCS accept there may be some advantage in improving road links, although any advantage will be ancillary to the purpose of the junction/link road 'to provide access to the development' and should be weighted accordingly. The balance against all the negative traffic issues arising must also be considered. The increase in traffic arising from the development will outweigh any mitigation by a new link available to existing hospital traffic.
103. Other options to improve links to the hospital exist. Existing service access roads in Hathersham Lane /Weatherhill Roads could be adapted for emergency vehicle use.
104. The option for a new junction in a more favourable location for both local authorities could be considered. Dialogue with DfT (via Sam Gyimah MP) in connection with alleviating HGV traffic problems in Tandridge has taken place including the possibility of a M23 link to **the north of Redhill** which would serve some of the advantages suggested by the promoters arising from the new junction **and furthermore provide benefit to Tandridge**. Both local MPs (Gyimah and Blunt) have been calling for improved motorway access 'north of Redhill' for several years and Mr Gyimah recently said: "*An interchange at Hooley would allow improved movement onto the motorway network north of Redhill and make a real difference to residents of Nutfield, Bletchingley and Godstone who are currently affected by an excessive volume of HGVs using the A25 to access the Redhill area*".
105. In the absence of specific data it is not possible to comment on any potential regional advantages. However any South East Regional advantage that may accrue is a similarly ancillary product and must be similarly weighted.
106. In addition to the access section the proposers will also have to comply with all other sections of the 02/13 regulations and The Design Manual for Roads and Bridges which also place onerous obligations on developers to produce evidence of compliance.
107. The link road route is presently only diagrammatic, however the area depicted is subject to significant problems, regarding ground levels, elevations and associated flooding. Additional complexity (to that presently anticipated by the proposers) for design of the new junction/link road is likely to arise and affect delivery.
108. In their letter of 28th July 2017, Highways England clearly set out the numerous compliance issues and other matters concerning the many hurdles the promoters need to address to guarantee delivery of a junction. (Annex G Duty to Cooperate Update)
109. The letter includes references to funding issues: "*we note the promoters offer to privately fund any junction/other works (up to around £110m for infrastructure was mentioned), but at this early stage it cannot be known what mitigation is required (eg type of junction/ any other works), when and hence how much it would cost. Also HE, to safeguard Government and taxpayers interests, would require appropriate fiscal and other guarantees to be in place*".
110. The letter also states: "*we note that the currently envisaged scale of the development (6000 - 8000 homes + 3000 jobs + all community infrastructure) appears smaller than elsewhere where new development has justified new Motorway junctions*". They also assert that they are neutral regarding the issue and will make decisions based on the evidence. (Annex G Duty to Cooperate Update)
111. A letter has been submitted from Chris Grayling the Secretary of State for Transport. Mr.Grayling's potential responsibilities in making any decision regarding a new junction demands neutrality. The Minister cannot make any comment that may be interpreted as pre-determination. Mr. Grayling indeed avoids an opinion. He makes no judgement on the case stating only:"*there may be a strong case*". He can't really say anything else as, at this point, no case is presented. He points out the necessity for planning and environmental compliance and quite properly refers the matter to HE. Any inference that this letter is supportive or provides any assurance of support for the promoters is incorrect and we would expect TDC to ignore any such inference.(Annex G Duty to Cooperate Statement Update)

See also Appendix 6 – Motorway Link Engineering comments by Chris Hoskins - CH CONSULTANCY LTD

Benefit to Tandridge Residents

112. NCS support Council's principle encapsulated in the statement *"the emerging Local Plan is being prepared for the wider benefit of all residents by making significant improvements to infrastructure, including those that already live here and those that may move to the area in future"*. The GV concept is for a self-contained settlement detached from existing settlements.
(1.2 Garden Village Consultation)
113. Income to Council will accrue wherever a garden village is located within Tandridge District and cannot be considered specific to one site. NCS has been unable to identify any benefit arising from the aerodrome proposal that will accord with Council's vision for the emerging plan. This view is supported by reference in several of the consultation documents.
114. The aerodrome site is located at the extreme western side of Tandridge District. The proposers state the new link road *"will assist in relieving the more congested areas of Reigate and Redhill and the A23 join the M23 to the east via a new junction and improve connectivity of the East Surrey Hospital the A23 and communities to the west"*.
These are all within RBBC area and **offer no benefit to Tandridge**.
Furthermore, the promoters do not identify any benefits to the Tandridge district.
115. The lack of benefits to Tandridge in terms of employment are highlighted in the statements in the Transport Assessment *"The site could be attractive to commuters to London via Redhill/Earlswood as well as people working at Gatwick..."* and in the Sustainability Appraisal *"However, access to employment is good in the local area, with employment opportunities available in Redhill and other surrounding towns and onward access to central London and the south east via the three local railway stations. Improvements to the local motorway network should increase access to these employment options further"*. Significantly there are no references to any location in Tandridge District.
(5.3.2 Transport Accessibility - Assessment, 3.5.6 Sustainability Appraisal)
116. Letters from RBBC in June and July 2017 representing the views of **both Councils** (RBBC & TDC) following 'duty to cooperate' liaison similarly fail to identify any benefit to TDC. All perceived advantages arising from the new junction are within RBBC area.
(Annex G Duty to Cooperate Statement Update)
117. A letter from 'Coast to Capital' concerning the M23 corridor Croydon to Brighton includes references to the adverse effects of the M23 at Hooley; it makes no reference to any new junction south of the M25 and no settlements in Tandridge are mentioned in context of the M23. The letter does nothing to suggest benefits arising from a new motorway spur at the aerodrome site.
(Annex G Duty to Cooperate Statement Update)
118. TDC acknowledge the site will inevitably provide more benefits for residents in RBBC area
(Local Plan Garden Villages Consultation Document)
119. Council have reiterated on recent occasions their vision that provision of a 'garden village' will benefit Tandridge residents who will *"also have access to the new schools, improved transport, new medical facilities and shops that will be part of the development"*.
(Various TDC comments including Council Leader statement 18/8/17)
120. Conceptually and geographically the new development will be divorced from the Tandridge District. The plan includes buffers to South Nutfield as the only Tandridge community adjacent to the site. The motorway junction and link spur bypass the District and will not facilitate access to Tandridge town centres, leisure, trade, commercial or other amenities. Local strategic benefit will fall only to RBBC areas. A point on which the promoters, TDC, RBBC and all others agree. Occupiers of the new homes will have an affinity with RBBC. Tandridge will have no such connection and will derive no benefit from this proposal. The benefit sought to 'all residents' does not exist and will not materialise.

Employment

121. Currently, 26 individual businesses operate at the aerodrome employing 450 people and 50% of the businesses are aviation related. The present site is one of the larger employment sites in Tandridge.
(3.5.6 Sustainability Appraisal)
122. TDC categorise the site as *“an employment site comprising of large buildings serving a mix of industrial, warehouse and office uses...”* The site was originally considered through its Economic Needs Assessment (ENA) and recommended for designation as a Strategic Employment Site with continued use and suitable for B class use and development.
(ENA 2015 / 2016)
123. TDC further concluded that *“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 endure 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”*.
(ENA 2015/16)
124. The loss of those jobs would fail to maintain existing job levels and undermine TDC’s wish *‘to provide increased opportunities for residents and businesses who want to remain local and to retain our skills and jobs within the district.....’* (1.11 Garden Villages Consultation)
NCS submit that to sacrifice existing jobs and business premises on the basis of a speculative proposal will be counterproductive to TDC’s employment ambitions for Tandridge.
125. The promoters allege that 2,800 new jobs (office, industrial and warehousing) will be created. We note this represents a significant change from the original vision which indicated *1,000 permanent jobs (indirectly)*. (Part 4 Garden Village Consultation)
126. The vision employment figure is not a commitment, it is not substantiated and no indication is offered of how it will be fulfilled. At best it reflects the promoter’s hopes. In their vision the promoters merely replicate TDC’s broad description (in the ENA) of the existing employment site and, together with the quoted figure for employment, represent little more than a lure to Council rather than reflecting an achievable and sustainable delivery target.
127. The promoters own (varying and unrealistic) timetables confirm building homes take precedence with the first timetable indicating employment infrastructure building will commence ‘sometime after 2022’. The next timetable presented is completely silent on the matter.
128. An industrial site is well advanced at Horley. The site which is local to the aerodrome site, will provide facilities to absorb existing jobs displaced by development at the aerodrome.
The Horley site availability is years in advance of the new industrial site proposed at the aerodrome. The promoter’s visions are silent on the availability of the Horley facilities which reinforces opinion that jobs displaced from the aerodrome will relocate out of the district and seriously undermines the promoters ability to produce an increase in jobs for Tandridge. Selection of the site will result in a complete *cessation of aerodrome activity*. 50% of the current jobs are ‘aviation related’ so will be lost immediately and, due to the aviation connection, cannot be replaced.
129. Development of the aerodrome site will result in the loss of the remainder of the existing jobs. Not least due to the relocation of the business area and removal of the present business premises. The loss of existing jobs is confirmed by Lepus Consulting who also indicate that any possible relocation of jobs will not be in Tandridge. Their comment is significant. *“The existing aerodrome site provides the main source of local employment, with 26 businesses based at this location. These are likely to be lost should development at this potential Garden Village location go ahead....However, access to employment is good in the local area, with employment opportunities available in Redhill and other surrounding towns and onward access to central London.....”* (3.5.6. Sustainability Appraisal)

130. Following the 2014 High Court decision to refuse consent for a hard runway at the site, the owners adopted a strategy to develop the aerodrome's general business potential, which is now styled 'Redhill Business Park' offering office, warehouse and hangar space availability.
(www.redhillaerodrome.com)
Lepus Consultants state: "*Where a potential Garden Village location is in existing employment use and considered for allocation as employment use in the Local Plan, it is assumed that levels of employment will be maintained or increased through development.*"(2.5.16 Sustainability Appraisal)
131. The proposer's employment statements are speculative; there are no guarantees of job creation and no indication of when any new business accommodation will be available. This provides neither maintenance nor creation levels and completely undermines TDC's aspirations covered in the Lepus statement.
132. Currently, 450 jobs plus business accommodation exist at the site. This fully accords with the TDC assessment and categorisation of the site for employment use and safeguarding for that purpose. Retention as an employment site will assist TDC's desire to overcome the loss of 7% of the district's office floor space they have identified and provide scope to expand the identified need for business premises in the District. (1.10 Garden Villages Consultation Document)

Conclusions and Comments

- a) NCS have serious concerns including the issues of:
- Green Belt, Landscaping & Biodiversity
 - Flooding
 - Traffic & Transport
 - Employment
 - Viability/ Deliverability of the proposal
 - Developer Reliability
- b) The aerodrome site includes major additional complexities (each individually complicated) and presents multiple obstacles to the process of developing the actual housing on the aerodrome site on the scale proposed. These include:
- Duty to co operate
 - Development of a new motorway junction/ link road
 - Existing Local road upgrades
 - Funding for all road projects and infrastructures
 - Land acquisition purchase/options and associated funding.

The technical and administrative requirements involved are likely to cause delay and potentially preclude delivery of the proposal. The complexities and timescales associated with the site make it impossible to even begin delivery within the next ten years. Selecting a site that is unable to deliver within the necessary timescale would build in failure of the Local Plan and contradict council's own view. NCS support this view that it would be unsound to select a site that could not commence within a timeframe which could suitably contribute to Tandridge's assessed needs for the Local Plan period. (Local Plan Garden Villages Consultation document)

- c) The Government are currently consulting on a standard methodology to Objectively Assess Housing Need. According to Government (via the proposed methodology) the assessed TDC figures for the delivery of homes in the next 10 years may be increased. Local Plan delivery is seriously behind schedule the Regulation 24 was planned for winter 2017. TDC may wish to ensure a deliverable Local Plan is in place and adopted as soon as possible to avoid being taken special measures.
- d) TDC will no doubt have noted The Lepus 16 point objective scoring matrix table demonstrates the unsuitability of the aerodrome site. It will be noted the site scores on the matrix are the lowest of the sites. (Appendix C Sustainability Appraisal)

- e) Numerous flaws and weaknesses in the aerodrome proposal are exposed. These are confirmed in the consultation documents which include independent sources. Compound complications affecting deliverability persist and present numerous areas of significant risk to TDC Local Plan delivery if a decision to proceed with this proposal is taken.

NCS submit that the Redhill Aerodrome site is not suitable for a garden village as it fails TDC's objectives and presents an unacceptable level of risk to deliver a site in accordance with the council vision. We further submit it should not be selected for any such development.

Yours sincerely,

Peter A Forbes
Chairman – Nutfield Conservation Society

Appendix 1 – NCS letter 25 July – Redhill Aerodrome Garden Village Deliverability



7 Braes Mead
South Nutfield
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Sarah Thompson,
Head of Strategic Planning Policy
Tandridge District Council

cc Piers Mason/ Martin Fisher/ Debbie Vickers

25 July 2017

Local Plan – Redhill Aerodrome Garden Village Deliverability

Nutfield Conservation Society has identified many significant and diverse matters that completely undermine the aerodrome site as being suitable for the proposed housing development.

We consider the situation regarding the provision of a new motorway junction on the M23 is so important and will have implications for the forthcoming Regulation 18 consultation that it should be considered in advance of that process.

The promoters confirm that, without the building of a new motorway junction, the proposal to develop Redhill Aerodrome as a 'garden village' would not be deliverable. They also confirm that a new junction would be funded by them.

Council will be aware that the procedure for consent and construction of a new motorway junction and link road is a complex and time consuming process involving a number of agencies, authorities and the community. This complex procedure is exacerbated at this site by the probability of having to acquire land to further such construction, possibly by compulsory purchase with potential for legal challenges. The already extended process may thus be subject to additional delay, disruption and complication.

Notwithstanding the complexity of the procedures, the high costs of building a new motorway junction will have a significant bearing on the viability of developing a garden village and would represent a major investment not normally associated with a housing development.

NCS acknowledge that TDC have an obligation to objectively consider all sites submitted to them by the deadline in December 2016. Clearly to exercise this obligation in assessing the suitability and deliverability of sites submitted involves resource and cost implications for council. Implicit in council obligations is a responsibility to exclude from consideration any site that cannot unambiguously be demonstrated as being deliverable or deliverable within the plan period to 2033.

1. It is noted that the Thakeham proposal was submitted in November 2016.
2. NCS acknowledge that the proposer's vision statement includes reference to feasibility for a new link road and M23 motorway junction to take place in 2017-2018.
3. Given that the building of a new junction is the essential pillar of the proposal it would be a reasonable expectation that the proposer would, at the earliest stage possible (ideally when putting together the vision statement) to have made exploratory enquiries of relevant authorities to establish that the proposition of a new junction was possible and thus be in a position to provide assurance to the authority at an early stage of the councils Local Plan procedure.

4. In April 2017, Highways England confirmed that they were not aware of the proposal and had not been involved in any discussions. In fact, having then become aware, they sought information concerning the matter.
5. In June 2017, Council officers raised concerns regarding the deliverability of the location within the plan period and the absence of a commitment from Highways England for a new junction. Assurances were required by 18th July in advance of the planned consultations. NCS understand that no such assurances were provided by the council's deadline.
6. The proposers appear to have failed to identify the importance of establishing a position to provide the earliest possible assurances of deliverability to council.
7. The delivery timetable suggests 2020-21 start on site and 300 dwellings over a two year period. During the same period it is anticipated legal agreements and further detailed design will be undertaken regarding the link road and junction. The M23 new junction construction period will not commence until 2022 ie two years post commencement of planned housing construction.
8. The proposers appear to have a lack of priority and urgency to establish a clear position on the vital issue of provision of the new junction which they acknowledge without which they proposal cannot be delivered. We are concerned as to their ability to deliver this proposal in general let alone delivery within the Local Plan period.
9. NCS would also draw council's attention to the advanced commitment by Highways England to carry out an upgrade to Smart Motorway between junctions 8 -10 including the provision of low noise surfacing. The adverse implications for this important project are significant. Clearly public money may be wasted if the 'smart motorway' construction works are completed and then intervention is necessary to construct a new junction or the project is delayed/hindered while the new junction project is subject to a prolonged process with an uncertain outcome. This is another major factor in consideration of the deliverability of the proposal.

Council are no doubt aware that new motorway junctions are constructed primarily to contribute to the strategic road network. Legal argument on the validity of a new junction for a development project will add to the question of timely delivery and may even further delay the Local Plan.

Directly associated with the motorway junction and link road is the important issue regarding the unsuitability of the existing road infrastructure around the aerodrome site to support the volume of traffic which would be generated by the proposal. Clearly a new junction/link will do nothing to mitigate this serious problem.

In summary:

- a) The procedure to produce a new motorway junction is complex and time consuming.
- b) The building of a new junction represents significant financial implications beyond standard development costs for the sponsor.
- c) The purpose of a new junction to facilitate a housing development does not accord with the criteria of contributing to the strategic road network.
- d) There are significant potential adverse effects on the plans for construction of the 'smart motorway'
- e) There are other serious issues regarding the unsuitability of the existing local road network to sustain the massive increase in road traffic development would generate.
- f) The developers have failed to provide any evidence of meaningful or timely action to supply assurance to council of deliverability. A deadline has been missed which must lead to concern that future time scales may be in jeopardy.

g) The time scales for production and implementation of the Local Plan are imminent and relatively short. Construction projects in general are subject to delay and the added complexity of including a new junction is a major time and delay factor.

h) The proposal is to commence building homes before even legal agreements and design details for the new junction link road are finalised. The potential for delay and non delivery are clear.

To proceed with a process to potentially select a 'garden village' site, council must be assured it can not only be delivered but will be completed within the actual Local Plan delivery period. NCS submit that the evidence already available to council clearly demonstrates that the proposal is unlikely to be deliverable and at the very least undeliverable within the Local Plan period.

NCS further submit that to proceed with this proposal will unnecessarily incur unnecessary council expenditure.

The selection of any site that subsequently proves to be undeliverable or to achieve set time scales will be a disaster for the Local Plan, Tandridge Council and its residents.

The schedule of 2020-2021 for producing legal agreements and design details for the new junction link indicates that, even at that advanced stage, no guarantee can be given that the new junction will be delivered or be completed on time. At the very least the potential for extended negotiation on legal agreements and or design details prevails.

We are appalled at the proposition of any consideration of a plan to commence building homes in advance of producing legal agreements and further design detail for the new junction. These must be finalised and guarantees to Council put in place to avoid the catastrophic situation whereby the junction proves to be undeliverable and the Council and the community are left with a few homes built and the site unable to be completed.

The Society is surprised therefore that, in spite of the lack of existing assurance regarding deliverability which will even prevail post commencement of construction, Council see fit to keep the Redhill Aerodrome site in the Local Plan Regulation 18 consultation.

We urge Council to withdraw this site from consideration with immediate effect.

Peter Forbes
Chairman
Nutfield Conservation Society

Appendix 2 - comments from Sholto Holdsworth BSc, MSc. Consultant entomologist at Natural History Museum

Theppswood House
Nutfield Park
South Nutfield
Surrey
RH1 5PA

06/10/2017

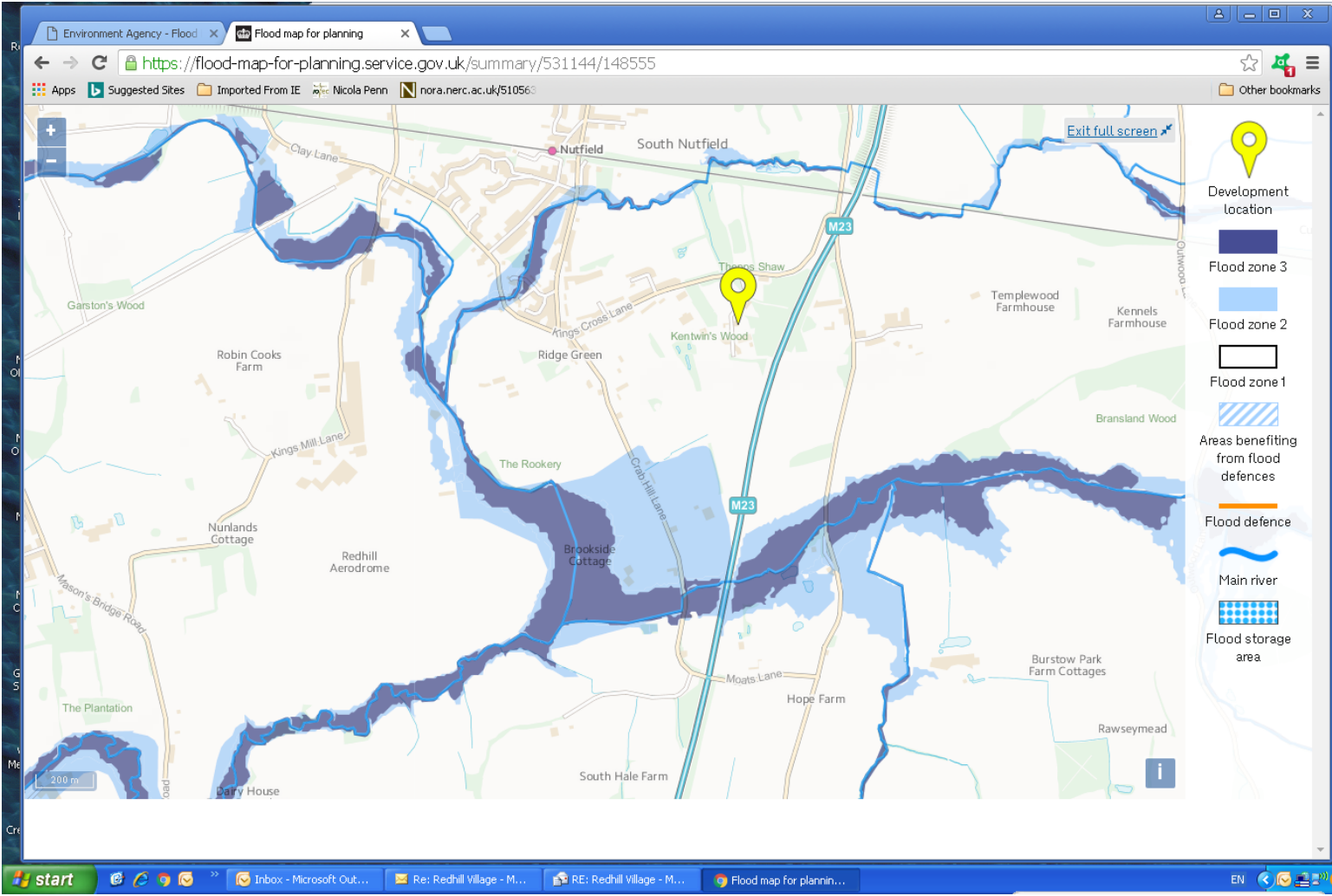
To whom it may concern

Subject: Habitat conservation concern regarding the Redhill Aerodrome building proposal

I am writing to you with genuine concern in terms of a habitat conservation standpoint with the proposed building of a garden village in the Redhill Aerodrome area. The area of Redhill Aerodrome itself and also the surrounding pasture fields (particularly in the South Nutfield area) act as vital wildlife corridors for a high diversity of both vertebrates and invertebrates. This is true of the unusually high diversity of insect fauna in the area (particularly Coleoptera) with many groups depending on open field/soil areas from larval development. These open areas are also very important for sustaining and contributing to local habitat heterogeneity, aiding in the biodiversity of protected areas such as Philpotes Wood, a site owned and run by the Woodland trust. This is also important for aiding in habitat corridors between the highly fragmented ancient oak woodlands surrounding the local area which are vital for biodiversity and conservation of habitat dependent species. There is a valid reason why the area of Redhill Aerodrome is designated Green Belt. These habitat conservation issues should be taken into account with the planned development proposal at Redhill Aerodrome as if the proposal was given the go ahead it will have a severe negative impact in this highly important habitat.

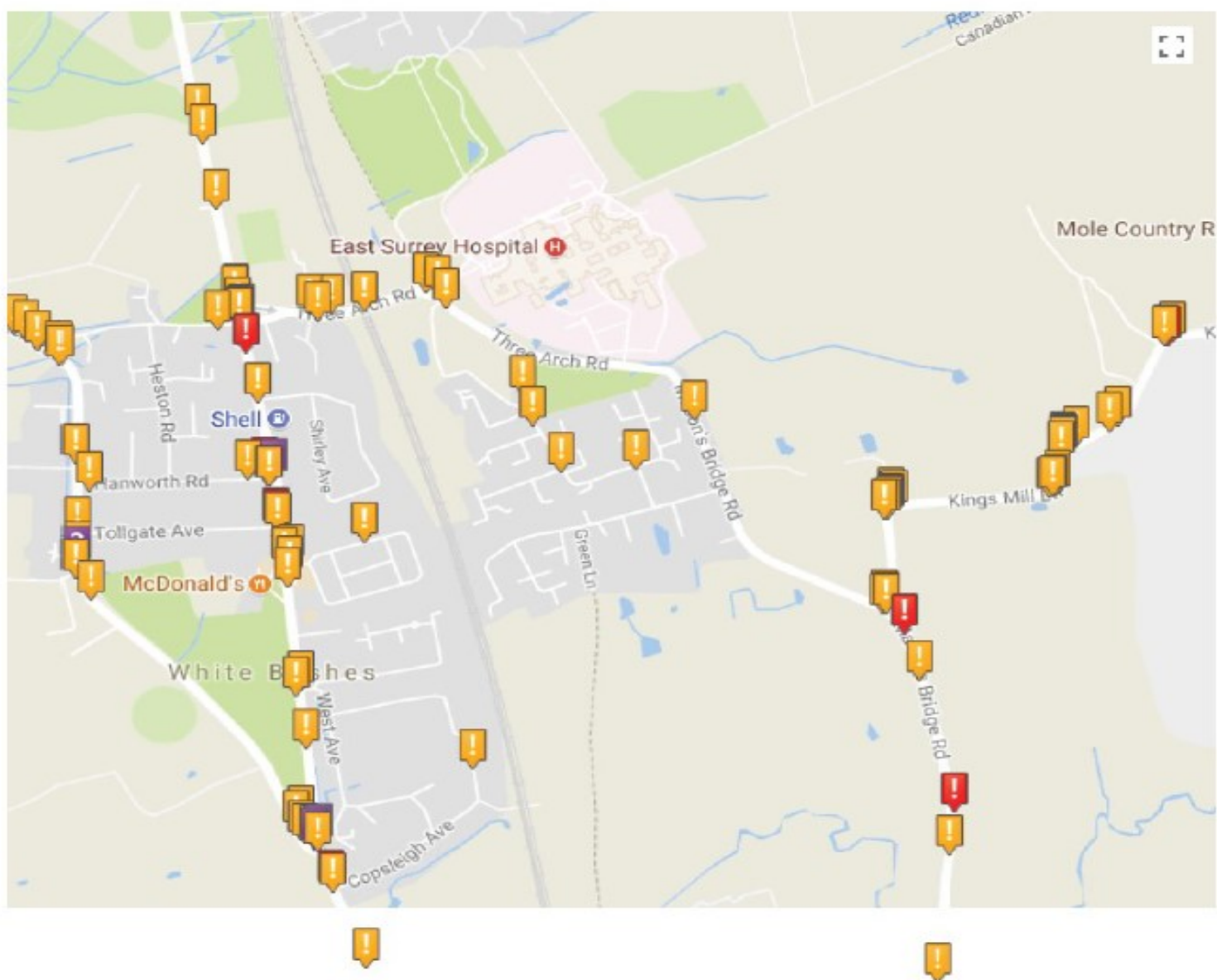
If you would like to discuss the above further I am a Consultant entomologist and a research associate at the Natural History Museum, London.

Yours faithfully, Sholto Holdsworth BSc, MSc.





[More Information...](#)



Appendix 5 – Local resident view regarding impact of development on local roads

Much has been made by the promoter of the proposed new motorway junction and link roads – as if this would solve all traffic problems. A new motorway junction would deliver extra traffic straight onto the A23 at Redhill. This road at the Three Arches roundabout is already congested, and would be unable to cope with a new influx of vehicles. The roundabout itself is reached by a narrow two lane road under the railway. Large scale works would be required at this point to serve both the new proposed development and additional motorway traffic. But focusing on the new motorway junction/link road ignores the fact that many of the additional road traffic movements would be to the North, South and East of the site.

Accessing the A23 South

This would have to be via Masons Bridge Road. Cars can pass on this road, but the road edges are degraded and sometimes dangerously rutted where cars/lorries have used the verge. At one point, the road narrows to a single lane over a bridge, before coming to a very busy crossroads with Axes Lane. Cars are frequently backed up here. The A23 can be reached by turning right at this point – but the road is reduced to a single lane for a long section where residents park their cars in front of their homes.

Accessing the A25 East and West

Drivers could only reach the strategic A25 – both Eastbound and Westbound - at Nutfield via either Clay Lane / Fullers Wood Lane, or Bower Hill Lane / Sandy Lane.

Clay Lane passes under the railway line at Egg Arch Bridge, and the road at this point both narrows to a single carriageway, and bends so that oncoming cars cannot be seen. Fullers Wood Lane is very narrow, a single carriageway with little room for cars to pass. It has two very sharp bends with no view of oncoming traffic. The junction with the A25 is reached via a steep hill to a crossroads. Oncoming traffic on the A25 cannot be seen unless the car is eased out into the carriageway. This crossroads is already a rat-run in morning and evening rush hours, and a dangerous one.

Bower Hill Lane also narrows to a near single carriageway at another bridge under the railway, before joining Sandy Lane on a steep hill and a sharp bend. Sandy Lane already sees traffic heavily backed up at busy times, as drivers join first Mid St, then queue to turn left or right along the A25 in Nutfield High St.

Accessing South Nutfield and Outwood

Crab Hill Lane links South Nutfield and Outwood. It would either have to be bridged by the motorway spur – extra expense – or if it was linked to the spur, rat runs would swiftly develop in residential areas in Kings Cross Lane, and up and down Mid St through the heart of South Nutfield village.

Kings Mill Lane will run through the heart of the proposed development, and would become an east west link road. It has several very sharp bends where there have been frequent accidents in the past. Verges in parts are degraded. Traffic is often backed up at the junction with Masons Bridge Road. In South Nutfield, it joins Bower Hill Lane, Clay Lane and Kings Cross Lane, at a busy staggered junction. This would become the main access point to South Nutfield.

Pedestrians and Cyclists

None of these narrow local lanes - Crab Hill Lane, Kings Cross Lane, Axes Lane, Masons Bridge Road, Kings Mill Lane, Kings Cross Lane, Clay Lane, Fullers Wood Lane, Bower Hill Lane and Sandy Lane have pavements for pedestrians. Most are narrow, sometimes single carriageway, and with limited overtaking opportunities for cars and cyclists. Road safety would be a serious issue.

The local road network of narrow lanes is unsuitable for the increase in road traffic that would be generated by 8000 houses. The site is not well served by public transport. Road access and road safety are critical issues. A development must be sustainable if it to fulfil national planning requirements. This is far from being the case here.

New Motorway Junction and Link Road – Construction and Impact Issues

The Thakeham proposals are scant and essentially diagrammatic but now show the junction immediately south of the Coopers Hill viaduct, having previously indicated this further south near the Eugene Bann Tennis Centre in Crab hill Lane. NCS suspect that fitting in the junction and spur road has not been given any real consideration at this stage (as occurred for the 1993 feeder airport proposal where the proposals were shown to be unworkable). Thakeham confirmed this approach and have merely stated that these are matters for consideration at a later design stage, but NCS remain concerned that the required scope of such significant works and their impact in terms of special, economic and environmental considerations continue to be under appreciated.

(RACC meeting 13/09-2017)

Apart from economic and environmental considerations, it is evident that the spur road and the necessary allied drainage and flood control works will require an extensive land take as well as creating a complex location/design issue.

South of the Coopers Hill Road viaduct, the motorway runs downhill at a moderate gradient for a motorway, into the cutting through an area of ancient woodland. Immediately south of the footbridge over the motorway behind Kings Lodge care home, the natural ground falls away steeply and the motorway runs onto an embankment up to several metres in height. Then it proceeds across the level of the field to the west, to then run back essentially to the natural ground level adjacent to the aforementioned Tennis Centre. Any slip roads off the motorway thus could only start at the southern end of the viaduct at best and the gradients would need to be very steep (by motorway design standards - and in excess of the 6% quoted in the Design Manual for Roads) to run down to a ground level junction below the current motorway level. Such a junction arrangement would have to be located towards the southern end of the proposed development area and would have potentially significant drainage and flooding issues.

Alternatively, the roundabout and the approach roads could be elevated, but the required embankments would be substantial and have a significant visual and noise impact. The proposal shows the junction to be immediately south of the area of ancient woodland with slip roads through this critical area and totally inadequate slip roads south of the roundabout. The natural ground is falling away steeply and thus long slip roads would result in a similar manner to the slip roads east of the Reigate Hill junction on the M25.

Either approach would need a substantial land take to fit in the road system and allied drainage/flood works. There would also be potential problems excavating into the steep cuttings beyond the Crabhill Lane viaduct) because of the nature of the slope material, the loss of the well-established stabilising vegetation and the large natural ponds (and established great crested newts presence) in the woodland. Kings Lodge Care Home has limited land between it and the motorway and its presence might affect the access road from the motorway on this side. Depending on the actual location of the slip road and the access spur beyond, the required embankments will be situated on side sloping ground and will need to have sufficiently flattened slopes and drainage arrangements.

The feeder spur running west will need to cross Crabhill Lane (presumably overhead, as Crabhill Lane cannot readily be lowered locally due to flooding/drainage issues). It will also need to be elevated on an embankment across much of the eastern side of the present aerodrome for the same reasons and would add further to the visual impact. This will further restrict areas of the flood plain by its presence and the Environment Agency will require equivalent compensatory flood storage space.