

# Nutfield Parish Council's response to Tandridge District Council's Local Plan Garden Villages Consultation (Regulation 18)

## Introduction

Nutfield Parish Council (the Parish Council) welcomes Tandridge DC's decision to consult on its current four potential locations for a "garden village" at such an early stage in the plan making process. The Parish Council's responses to the issues are set out below.

As with the two earlier Regulation 18 consultations, in drafting its response the Parish Council has sought to act as a "critical friend". It recognises the difficulties that Tandridge DC is facing in drafting its Local Plan, yet at the same time is endeavouring to highlight in a constructive way matters where it feels that there are flaws in the council's approach or shortcomings that need to be addressed. In doing so it has supported its comments with relevant evidence.

However, the Parish Council has consistently opposed any inappropriate development at Redhill Aerodrome, and there is widespread concern among its Parishioners and local employers (including those at the Aerodrome) about the many adverse consequences of building such a large settlement at this location. The Parish Council's view is that the Aerodrome is not an appropriate location for a "garden village" and this is reflected in our comments which only focus on its unsuitability.

## 1 Legitimacy of this consultation

The Parish Council has a number of reservations around the legitimacy of this consultation exercise both generally and specifically in relation to Tandridge DC's assessment of the suitability of Redhill Aerodrome as a potential location for its "garden village".

## General concerns

### 1.1 Inadvertently constraining consultation responses

The Parish Council has some reservations about Tandridge DC's decision to gather views to this consultation via a questionnaire.

In its view this questionnaire will constrain the scope of the responses received, especially as respondents are not being encouraged to comment on the new suite of accompanying documents that underpin this consultation document.

### 1.2 Failure to moderate the judgements in the summaries for each location

Tandridge DC does not appear to have moderated the four assessments to ensure consistency of judgement where the same issue arises across two or more potential locations. As a result the weight given to the same issue differs significantly.

For example, both Redhill Aerodrome and "Land – West of Edenbridge" are locations which cross administrative boundaries and where the adjoining authority is at a different stage in its plan making process. Yet the significance of this same issue differs between these two assessments.

### 1.3 Inadequate assessment process

In the Parish Council's opinion the process that Tandridge DC has put in place to assess the suitability of the four potential locations is not sufficiently robust to enable the council to make a decision about its preferred location. By using the same template across all four locations, this process fails to take account of a wide variety of issues that may set one location apart from the other three.

For example, in the case of the Aerodrome the Landscape Capacity assessment states that “... *it has no landscape designations and few landscape features of high landscape value*”. The Parish Council does not disagree with this assessment, but what it fails to mention is that the proposed location is an airfield with two grass runways used by light aircraft and helicopters. So, it is not surprising that there are no high value landscape features, as these are not recommended for an operational airfield.

#### **1.4 Inaccessibility of the technical documents**

The accompanying suite of technical documents is comprehensive, but these are time-consuming to read. As the Parish Council has consistently highlighted in its responses to the previous two Regulation 18 Consultations, Tandridge DC needs to make these evidential technical documents more accessible if only by posting summaries of their contents.

Also where evidence from one of these accompanying documents is cited in the location assessment in the consultation document, there is no reference to the exact paragraph within the relevant document.

More importantly hidden within them are key pieces of information that the Parish Council believes Tandridge DC should have highlighted to ensure that respondents had a full picture of the proposals at each location. For example, the “Transport & Accessibility Assessment of Potential Garden Village Locations” (August 2017) contains three Masterplan options produced by Thakeham Homes. Why were these not posted on Tandridge DC’s web page for this consultation under “Information submitted to the council by site promoters”?

Also the “Duty to Cooperate Statement Update” (August 2017) contains as an Appendix containing notes of meeting held and letters from relevant agencies such as Highways England and Coast to Capital that provided detailed information about Thakeham Homes’ proposals, but their availability is not mentioned in the assessment for this location.

### **Specific concerns – Redhill Aerodrome**

#### **1.5 Impact of promoter’s decision to increase the number of proposed homes**

In the Parish Council’s view Tandridge DC should have issued an addendum to this consultation to clarify the promoter’s revised development proposals for this location.

Its failure to do so has seriously compromised Tandridge DC’s assessment process for this location, particularly as the only substantive document submitted by Thakeham Homes setting out its proposals, namely the Representation Letter sent by Savills, is no longer valid.

#### **1.6 Validity of the assessment and the underpinning technical documents**

The Parish Council believes that as a result of the increase in the proposed size of a “garden village” at this location undermines the validity of the evidence in the technical documents from which Tandridge DC has drawn up its assessment of the Aerodrome’s suitability.

The suite of accompanying documents that underpin the summary assessment of the Aerodrome as a potential location seem to be based upon different assumptions about the number of new homes in a “garden village” at this location. For example, Tandridge DC’s August 2017 Sustainability Appraisal only considers the impact of over 2,000 homes (page 48) at this location.

#### **1.7 Impact of proposed numbers upon Tandridge DC’s “garden village” concept**

In the Parish Council’s view Thakeham Homes’ proposal for this location is no longer a “garden village”.

Although 8,000 homes is at the upper end of the government's definition of a "garden village", because of its rural nature under Tandridge DC's own settlement hierarchy, such a development would be defined as urban in the same way as Oxted, Caterham Valley, Caterham on the Hill, Whyteleafe and Warlingham (Tandridge DC's Settlement Hierarchy, 2015).

## 1.8 Failure to assess the adverse consequences on adjoining communities

Tandridge DC's assessment of the suitability of Redhill Aerodrome is flawed as it only considers issues arising within its administrative boundary.

For example, the assessment in relation to the two locations wholly within its boundary highlights the traffic congestion on the A22. By contrast while there is a reference in the Aerodrome's "Highways and Transport" section to the "*existing issues on the A23*", these are not mentioned at all in the "Current overall conclusions". Had the assessment considered the A23 traffic issues, then the equally, if not more serious issues, on the A23 generally and specifically at its junction with Three Arch Road would have come to light.

## 1.9 Selective summary of Aerodrome's suitability

In the Parish Council's view in summarising the findings of its technical documents underpinning the Aerodrome's assessment, Tandridge DC has either deliberately or inadvertently focused on its suitability while failing to mention or minimising the reasons why it is not suitable.

For example, the economic needs section dismisses the recommendations of Tandridge DC's 2015 "Economic Needs Assessment" on the grounds that "*...the garden village will be required to provide a community hub, which is likely to include leisure and retail. As such, additional jobs will also be provided and would not necessarily lose the existing employment space...*". What this section fails to recognise is that not all jobs are the same. The Aerodrome currently provides a wide variety of employment opportunities, many of them highly skilled. By contrast leisure and retail jobs generally tend to be less skilled, involve working unsocial hours and are lower paid.

Likewise, Tandridge DC has reduced the findings of its Sustainability Appraisal (August 2017) which highlights a number of reasons why the Aerodrome is an unsuitable location to single sentence and a reference to the document. The Parish Council would have expected as a minimum that the "traffic light" summaries in respect of all four locations would have been inserted into these sections. Doing so would have summarised very effectively the positives and negatives of each location in terms of sustainability.

## 2 Vision, Principles and Objectives – General comments

### 2.1 The Parish Council is disappointed that Tandridge DC has failed to include in this document its "blue print" for a 21<sup>st</sup> century "garden village".

Although the first sentence in paragraph 3.1 acknowledges the need for Tandridge DC "*...to establish and set out our requirements against which any proposal will be considered*", it has failed to do so in this document.

Having agreed its preferred strategy in March 2017, the Parish Council anticipated that Tandridge DC would have drafted, at the very least, some high level statements setting out its interpretation of the key characteristics of a "garden village" taking into account the district's local housing requirements, infrastructure deficiencies, employment requirements and so on.

The Town and Country Planning Association (founded by Sir Ebenezer Howard who pioneered the garden city concept) is the leading advocate of the garden city approach. It offers a number of such broad parameters for a 21<sup>st</sup> century settlement that Tandridge DC could have adopted or adapted to

articulate what living in its garden village would be like (page 10, “How Good Could It Be? A Guide to Building Better Places” TCPA 2013)

As a result the Parish Council does not believe that Tandridge DC is in a position to rigorously appraise the suitability of any of the four currently proposed locations for a “garden village” until it can clearly articulate a “garden village’s” broad parameters.

- 2.2 The Parish Council is concerned that Tandridge DC may not have adequately considered and explored the distinction between a new “garden village” and a new settlement. Although central government has issued only limited guidance on what constitutes a “garden village”, it is clear that it needs to “*embed garden city principles to develop communities that stand out from the ordinary*” (paragraph 11, “Locally-Led Garden Villages, Towns and Cities”, DCLG 2016).

Based on the evidence in the consultation document Tandridge DC seems content to accept whatever the promoters of the four sites put forward in their embryonic master plans. If this is indeed the case, then “garden” would just seem to be “*a convenient label*” (paragraph 10 *ibid*) for what will turn out to be a profit led private sector housing development with standard house and flat types, built as cheaply as possible with the minimum of social and affordable homes, and inadequate social, community and physical infrastructure.

- 2.3 Although two of the potential locations for its “garden village” cross administrative boundaries (with another district council and in case of Edenbridge a different county council), this consultation is silent on the potential problems that this may create in delivering Tandridge DC’s aspirations for a new settlement that meets “garden village” criteria.

At the very least this consultation should have acknowledged this, and outlined how Tandridge DC would be able to guarantee that its vision, principles and objectives for the “garden village” (hopefully fine-tuned to take account of the responses to this consultation) would be adopted by the partner district council and in the case of Edenbridge the county council.

The Parish Council is unable to find any references to discussions around this particular issue in the meeting notes with the relevant local authorities in Tandridge DC’s “Duty to Cooperate Statement Update” (August 2017).

### **3 Vision - Responses to Tandridge DC’s consultation questions**

*What do you think about the proposed Vision for the new Garden Village?*

- 3.1 The Parish Council does not believe that the proposed vision is sufficiently aspirational, and also it is questionable whether it fulfils the accepted criteria of a vision.

Government guidance stresses the importance of “garden villages” being “*great places*” that “*stand out from the ordinary*” (paragraphs 10 and 11 “Locally-Led Garden Villages, Towns and Cities”, DCLG 2016). In the Parish Council’s view Tandridge DC’s vision could apply to any new development.

Also the vision reads more like an achievable goal rather than a longer term aspiration. A vision should set out what Tandridge DC is looking to achieve in the mid to long – term by setting guidelines that will inform the choices that it makes as it works towards delivering it.

- 3.2 The Parish Council is concerned that the proposed vision appears to be solely focussed on the “delivery” phase of a “garden village’s” development. The emphasis is on “*To deliver a...*” and “*...to create a community led development*”. These are short term aspirations better suited to the delivery of a new village settlement rather than a “garden village”.

What should differentiate a “garden village” from other developments is a long term focus and commitment to “*place making*” and “*the creation of a vibrant community*” (one of the aspirations of the

new Derwenthorpe settlement that sought to emulate the earlier garden village development at New Earswick - <https://www.jrht.org.uk/community/derwenthorpe>).

- 3.3 The vision contains five key words (“desirable”, “modern”, “sustainable”, “innovation” and “community led”), but their definitions in this context are unclear. Are these being used in a technical sense or as they would be used in everyday language?

Usually where such terms are used in a vision, then these are clearly defined. In addition these words are either not mentioned or where they are, not defined, in either the principles or the objectives. As a result in the Parish Council’s view the vision lacks both meaning and substance.

*Would you recommend any changes?*

- 3.4 Nutfield PC would recommend that Tandridge DC revisits this vision with the aim of envisaging what it will be like to live, work and visit its “garden village”.

There is no shortage of precedents from which to draw inspiration. The fourteen successful “garden village” proposals in receipt of the 2017 government funding have had to set out their vision and the Town and Country Planning Association (TCPA) has a description of a settlement based on the garden city concept:

*“A Garden City is a holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities”* (<https://www.tcpa.org.uk/garden-city-principles>).

- 3.5 The vision needs to be rewritten to ensure that it has “a longer shelf life” and focuses on how its garden village will be a great place to live with a community that stands out from the ordinary.

#### **4 Principles - Responses to Tandridge DC consultation questions**

*What do you think about the Principles for the new Garden Village?*

- 4.1 The Parish Council does not believe that Tandridge DC’s eleven statements meet the commonly accepted test for “principles”. The Parish Council’s understanding is that principles set out an organisation’s fundamental values or norms to enable it to determine the right course of action in relation to the delivery of its objectives.

All of these principles instead seem to constrain the course of action available. For example, its second statement “*Genuinely affordable social and market lifetime homes*” excludes a wide range of other existing tenures, such as affordable rent, sub and market rent, low cost home ownership options, self-build homes, and so on, and seems to preclude the adoption of any other tenure forms that might be developed by the time the first homes are completed.

- 4.2 The Parish Council is concerned that Tandridge DC is only “*cognisant*” of the TCPA’s Garden City Principles and has not adopted those which it feels are relevant to its local circumstances.

The TCPA has updated Sir Ebenezer Howard’s original principles to make them more relevant to 21<sup>st</sup> century communities and has consistently advocated an approach to planning that is “*more responsive to people’s needs and aspirations and to promote sustainable development*” (extract from its website). Although there is some criticism of TCPA’s approach, if Tandridge DC is truly wedded to developing a garden village, then it needs to be more than “*cognisant*”, it needs to adopt them wholeheartedly or at least explain why it is not doing so.

In any case the Parish Council does not understand Tandridge DC’s reasoning for not adopting these nine principles (<https://www.tcpa.org.uk/garden-city-principles>). As the TPCA states “*The Garden City principles are an indivisible and interlocking framework*” for the delivery of such settlements.

4.3 In drafting its own principles Tandridge DC has excluded three of TPCA's key principles which in the Parish Council's opinion undermines the council's commitment to creating a "garden village, namely:

- *"Strong vision, leadership and community engagement*
- *Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food*
- *Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods".*

Government guidance identifies these as fundamental to giving a "garden village" "a clear and distinct sense of identity (paragraph 10, "Locally-Led Garden Villages, Towns and Cities", DCLG 2016).

4.4 Where Tandridge DC has used the TPCA principles as its starting point, it has made alterations that have either "watered them down" or fundamentally changed the outcomes that they will deliver. For example:

- "Community ownership of land and long-term stewardship of assets" has now been rewritten as "Engendering community pride through the stewardship and ownership of land, assets and facilities to ensure their management and maintenance for the long-term."

This change seems to significantly constrain the uses to which the community can use the income from this group of assets.

- "Land capture for the benefit of the community" has now become "Maximising on land value capture to deliver a well-serviced, balanced and attractive garden village which is of benefit to the community"

"For the benefit" is not the same as "of benefit", and Tandridge DC's wording seems to describe the usual S106 type arrangements where necessary infrastructure is funded via payments from the developer.

*Would you recommend any changes?*

4.5 Because Nutfield PC does not believe that its eleven statements meet the test of being "principles", it recommends that Tandridge DC should revisit its decision not to adopt the TPCA's nine principles.

These appear to be tried and tested upon which other local authorities have successfully made decisions about how to deliver a "garden village". Indeed a brief review of Runnymede BC's successful bid for government funding and support to deliver its "garden village", confirmed that it had adopted the TPCA's recommended nine principles without any amendment.

## **5 Objectives – General response**

Although there is no specific question inviting views on "what do you think about the objectives for the new Garden Village?" The Parish Council has several reservations regarding their usefulness and relevance.

5.1 An "objective" is an indication of what an organisation is intending to achieve and as such it is an aspiration. In the Parish Council's view Tandridge DC should have looked to consult on "outcomes" rather than "objectives" for its "garden village".

This is more than semantics, as there is a key difference between "objectives" and "outcomes". Furthermore in order to move from a set of "objectives" to "outcomes", Tandridge DC would have had to develop a set of outputs, namely what a "garden village" would actually deliver.

In the Parish Council's view doing so would have enabled Tandridge DC to better identify and articulate the benefits to the communities it serves of developing a "garden village".

- 5.2 One of the recognised advantages of developing an "outcome" or "outcomes" is that doing so often reveals other approaches to achieving the desired end result and also introduces more flexibility when looking to resolve an issue.

The Parish Council believes that failing to develop a set of "outcomes" has seriously undermined Tandridge DC's decision to opt for a "garden village" in its preferred strategy. Continuing to do so also adversely impairs its approach to determining the most appropriate location for this development.

- 5.3 Developing a set of outcomes is also the first step in laying down the non-negotiable criteria that will underpin the master plan for Tandridge DC's "garden village", and the supporting planning and other policies to ensure that the laid down outcomes are achieved.

Without these the Parish Council is unclear how Tandridge DC will develop measurable indicators to monitor progress in achieving both these outcomes and in turn its vision.

- 5.4 The objectives fail to address what the Parish Council would view as critical high level issues, such as community engagement at every stage in delivering a "garden village", creating a balanced community and so on. In short those outcomes that distinguish a "garden village" from a new settlement.

- 5.5 Finally the Parish Council is concerned that Tandridge DC has not considered whether there need to be different objectives for the three key stages of its "garden village's" development, namely "Pre-development", "Development" and "Establishing a community".

## **6 Objectives - Responses to Tandridge DC's consultation questions**

Although the Parish Council does not think these objectives are "fit for purpose", it has a number of concerns in respect of their content. In respect of the question regarding "changes to these objectives", the Parish Council would like Tandridge DC to respond to all the issues that it raises.

So, in response to all seven of these questions specific responses have only been made where the Parish Council has a particular issue about Tandridge DC's approach.

### ***Objective 1: Housing and Employment***

*What do you think about this proposed Objective for Housing and Employment in relation to the new Garden Village?*

- 6.1 This objective is not sufficiently focused on housing and employment. Instead it reads like a summary of all the other objectives and as such says very little about either Tandridge DC's housing or employment requirements.
- 6.2 With regard to the housing element of this objective the Parish Council is disappointed that Tandridge DC has not taken the opportunity to include a statement about tenure mix.

The Parish Council's view is that Tandridge DC will only achieve its objective to provide homes for "those just starting out, small and growing families and those wishing to downsize" if there is a full range of housing tenure opportunities, including part ownership products, self-build, market rent and so in addition to the usual split between open market sale, social housing and affordable rent.

Had Tandridge DC inserted the text from Paragraph 50 of the National Planning Policy Framework (NPPF), then this would have ensured that this objective addressed all the relevant housing issues.

- 6.3 The list of households quoted above (6.2) excludes a number of household types, such as single person, those with support, mobility or other needs, those without children or those with particular religious and cultural requirements.

Again this issue could be over-come by focusing on tenure options as set out in 6.2 above and adopting the wording in NPPF's paragraph 50.

- 6.4 The objective fails to consider the sequencing of new homes in relation to tenure balance.

There is some evidence that including both a full range of tenure options and "tenure blind" homes in every development phase is more likely to foster a sense of community.

- 6.5 With regard to employment there is no statement about the types of work opportunities or work environments that Tandridge DC would like to see provided.

There is evidence that the provision of employment opportunities in predominantly residential led development is problematic, especially where a new settlement is located near to existing employment hubs. This is recognised in Thakeham Homes' submission to Tandridge DC (27 June 2017).

In estimating the number of jobs available within its "garden village", Thakeham Homes has included "people working at home" (see slide 13 headed "Employment Opportunities and Air Ambulance"). In the Parish Council's view "People working at home" are not additional jobs.

- 6.6 DCLG's "Locally-Led Garden Villages, Towns and Cities" (2016) sets out its expectation that for larger settlements (as is the case at Redhill Aerodrome) the Local Enterprise Partnership, Coast to Capital, would be supportive (paragraph 18).

The Parish Council is concerned that Tandridge DC does not appear to have yet consulted with Coast to Capital even though its "Duty to Cooperate Statement Update" (August 2017) identified this organisation as one of the statutory bodies with whom it should.

*Would you recommend any changes?*

- 6.7 The Parish Council believes that housing and employment issues should be considered separately as their delivery issues are so dissimilar with different considerations and different funding mechanisms to be put in place.

### **Objective 2: Governance**

*What do you think about this proposed Objective for Governance in relation to the new Garden Village?*

- 6.8 Self – government was a key principle of the historic garden cities. Clearly, modern government structures mean that this is no longer a requirement.

Nonetheless the Parish Council is not convinced that Tandridge DC has fully recognised the importance of maximising the input and influence that adjoining communities, "garden village" residents and its businesses have in the governance arrangements.

- 6.9 The Parish Council's view is all parties involved in the creation of a "garden village" (namely land owners, developers, the local authority(ies), adjoining communities, residents and businesses) have an equal voice and can be heard even from the initial planning stages.

There are a number of existing models, joint venture partnerships, trusts and so on, all of which seek to create some form of partnership between all of the above parties. For example, the Building and



Social Housing Foundation's model is for the establishment of a New Settlement Partnership. This is a formal democratic body with all members having rights and responsibilities that is tasked with developing proposals and solutions that best meet the needs of a particular area ("Creating the Conditions for New Settlements in England", 2013).

- 6.10 The Parish Council is concerned that there is no commitment to community ownership either of the freehold of the land with the right to collect ground rents (a key garden city principle) or of community assets.

Having resources independent of the statutory authorities will enable the "garden village" community to maintain and upgrade community assets. This is vital given the vagaries of public sector finance, but even more so where there is more than one district council involved.

*Would you recommend any changes?*

- 6.11 The Parish Council is unclear why there is a reference to resilience to "emergencies and other challenges" in this objective. In the Parish Council's view responsibilities for these is within the remit of the statutory services

### **Objective 3: Land Capture and Investment**

*What do you think about this proposed Objective for Land Capture and Investment in relation to the new Garden Village?*

- 6.12 Of all the objectives this is the most badly worded and incomprehensible. The meaning of its first sentence is unclear and the second sentence seems to have no connection with the first.

The Parish Council assumes that Tandridge DC is referring to the issue of "land value capture", that is the differential between the value of land in its current use and the resulting increase arising from planning permission for a "garden village". If this is the case, then the second sentence makes more sense, although it is rather a naïve statement (see 6.13).

- 6.13 One of the keys to developing the early garden cities was the availability of land at low cost (at agricultural land value or nil cost), the commitment of a number of wealthy philanthropic individuals to lend monies to fund the upfront development costs and a fixed rate of return for those developers building the homes. This is far removed from the current usual private developer market led funding model for new developments.

Although Tandridge DC has not published its estimates of the finance required to provide the infrastructure needed to support its "garden village" concept and to subsidise the build costs of affordable homes, there is a wealth of evidence that the profits from the market led development of residential communities is usually insufficient to meet such costs. This may explain the wording of the second sentence. Rather than making a commitment to use "land value capture", Tandridge DC will only scrutinise and explore this opportunity as well as looking for other funding opportunities.

In the Parish Council's view even if land is acquired at agricultural value or compulsorily purchased, under the existing mechanisms for capturing a portion of the increased land value, there would still be a need for significant public subsidy to fund those elements that will distinguish Tandridge DC's "garden village" from a new settlement.

- 6.14 The Parish Council supports the currently emerging consensus that the existing mechanisms, for capturing a portion of the increased land value to fund infrastructure do not provide the necessary guarantee of certainty of its delivery, particularly in larger developments that take many years to build out.

So, before selecting its preferred location the Parish Council would like Tandridge DC, if it has not already done so, to contact the not for profit, Garden City Developments Community Interest Company for advice (<http://www.gardencitydevelopments.org>).

Recognising the inadequacies of the existing land value capture mechanisms, this organisation's aim is to "work with local authorities, landowners, developers and the public to:

- apply Garden City Principles to efforts to promote large scale developments; this includes embedding these Principles in local plans to ensure that they can legitimately be used by local planning authorities to evaluate spatial options for large scale development before preferred sites are chosen;
- advise on how best to establish appropriate local delivery vehicles for large scale development including building on the strengths of existing local development agencies;
- examine broad areas of search for new or expanded communities, including any proposals being promoted by developers and help to assess their potential compliance with Garden City Principles and for securing effective delivery; and
- encourage cooperation between local authorities and landowners and developers of large scale developments to deliver communities in accordance with Garden City Principles" (<http://www.gardencitydevelopments.org/index.php/whatwedo>)

#### **Objective 4: Design and Quality**

*What do you think about this proposed Objective for Design and Quality in relation to the new Garden Village?*

- 6.15 In the Parish Council's view this objective does not address "design" at all. Its entire focus is on quality, except for the final sentence which is neither about design nor quality.

There is general consensus that "good placemaking starts with a narrative about the design approach with reference to the location, character, topography and history and other influences that have shaped the layout and external appearance" (<http://www.designcouncil.org.uk/news-opinion/how-design-improving-quality-new-homes>)

This objective does not outline how Tandridge DC's will ensure that its "garden village" is well-designed. As is recognised "Well-designed environments go further than the minimum, they enhance a sense of well-being, enable healthy lifestyles and create delight" (ibid). Perhaps Tandridge DC could consider adopting this sentence as its objective.

- 6.16 With regard to quality the objective uses all the right words but there is no substance. The term quality is not defined, but by implication Tandridge DC appears to be adopting a very narrow definition.

As recommended by Design Council CABE "quality" is more than just about "the appearance of the homes and how they fit in with the character of an area. Whilst this is important, there are wider issues most importantly, the health, safety and well-being of the occupants" (<http://www.designcouncil.org.uk/news-opinion/how-design-improving-quality-new-homes>). None of these wider issues are covered within the objectives.

As well as amending this objective to include its definition of quality, the Parish Council would expect it to include references to standards, regulations, technical performance and construction and build quality.

- 6.17 In addition there is no reference to the importance of developing a master plan or recognition of the benefits of including existing communities in this process.

The Parish Council expected that this objective would contain both of these commitments. Its absence is surprising given the acknowledged benefits of engaging adjoining communities in the design process (paragraph 19 “Locally-Led Garden Villages, Towns and Cities”, DCLG 2016), and the accolades received for the community planning approach used in preparing the masterplan for the regeneration and redevelopment of Caterham Barracks (“Best Practice in Urban Extensions and New Settlements”, TCPA 2007).

- 6.18 Lastly, the reference to energy supplies and utilities in this objective is rather odd, as its link to design or quality is not made clear.

More importantly the Parish Council is concerned that Tandridge DC has already made the decision to opt for energy supply from the main grid. The technology for delivering locally produced energy is improving rapidly and the Parish Council believes that Tandridge DC should not have excluded this option at such an early stage in the planning process.

Even relatively small new settlements, such as Derwenthorpe, are low carbon communities and have their own Local Energy Centre supplying locally generated heating and hot water.

### **Objective 5: Landscape and Green Infrastructure**

*What do you think about this proposed Objective for Landscape and Green Infrastructure in relation to the new Garden Village?*

- 6.20 While the Parish Council is pleased that Tandridge DC has prioritised the landscape setting and green infrastructure, it does seem to be a lower order objective than the other six.

The Parish Council’s view is that these matters are elements of the overall design and should be included in that objective.

As Design Council CABE recommends “*An integrated approach to design is required to achieve this [good placemaking] with a range of inputs from architects, urban designers, landscape architects and sustainability advisers as well as engineering and cost consultancy*”.

(<http://www.designcouncil.org.uk/news-opinion/how-design-improving-quality-new-homes>)

*Would you recommend any changes?*

- 6.21 That Tandridge DC reviews whether this objective is better incorporated into another, particularly as Objective 7 includes references to infrastructure.

### **Objective 6: Social Community**

*What do you think about this proposed Objective for Social Community in relation to the new Garden Village?*

- 6.22 A fundamental principle of the historic garden cities was the placing of community assets into a trust. Doing so meant that income from them could be recycled to provide benefits for the community in perpetuity.

Critical to the success of any new residential community is the provision of appropriate community assets, and the Parish Council also supports Tandridge DC’s wish to set up a 21<sup>st</sup> century vehicle with the access to the resources and responsibility for managing, maintaining and upgrading this community infrastructure.

It is the Parish Council’s view that this vehicle should have an equity stake not only in these assets but also in the entire development regardless of whether or not the “garden village” is built on privately or publicly owned land.

6.23 The objective seems to imply that there would be a number of such vehicles.

While at present the Parish Council has no views on what would be the most appropriate form of vehicle, it does strongly believe that it should be a single vehicle accountable to the “garden village’s” community.

It also believes that this vehicle needs to be established before the development commences (with residents of adjoining communities representing the future residents prior to the homes being occupied) and legally enforceable through an appropriate legal agreement. Only a single vehicle covering all of the community assets will ensure a strategic and co-ordinated approach and a reliable income stream.

*Would you recommend any changes?*

6.24 The objective lists a number of potential community assets, such as village halls, recreational spaces and so on. The Parish Council believes that the need for such assets needs to be assessed having regard to the location and proximity of the “garden village” to other settlements and towns.

Although garden cities and indeed the New Towns were built as self-contained communities, it is arguable whether in the 21<sup>st</sup> century this is feasible or even desirable. With the increasing use of the internet for day to day shopping requirements, free delivery for takeaways and so on, it may not be economically feasible to provide a wide range of community facilities, particularly if there are existing facilities close by with the capacity and efficient and low cost public transport links to nearby towns.

The Parish Council is aware of new settlements where retail assets are vacant or let for purposes that do not serve the community in which they are situated and the impact that this has on the residents and other businesses.

#### ***Objective 7: Sustainable Transport and Infrastructure***

*What do you think about this proposed Objective for Sustainable Transport and Infrastructure in relation to the new Garden Village?*

6.25 The Parish Council believes that this is a very laudable objective, but very much doubts that Tandridge DC’s aspiration to provide “*an integrated network of roads and public transport...*” is deliverable given that these matters are outside of its remit and there is no single authority responsible for all aspects of transport in Surrey.

6.26 It is unclear what Tandridge DC’s means by incorporating the term “sustainable” into this objective. Without a definition, the objective is meaningless, for example, are you using the term in the same way as the 1987 Brundtland Report applied it to “development” or is the focus on environmental sustainability and reducing carbon emissions?

Regardless of the definition Tandridge DC needs to be explicit about how feasible it will be to achieve this objective. Will diesel and petrol cars be banned from its “garden village”, will car ownership be discouraged, and will households be able to purchase bicycles at a subsidised price and so on?

6.27 Finally, in the Parish Council’s view access to transport is an equality issue with the needs of poorer and older households and those containing a member with a mobility issue not being fully considered. Obviously in the latter case the focus on cycling and walking may not be appropriate.

*Would you recommend any changes?*

6.28 The Parish Council recommends that Tandridge DC considers the issues raised above.

6.29 The Parish Council's view is that the final sentence in this objective regarding charging points for electric cars and the design of the highways within its "garden village" is a matter of design rather than "sustainable transport".

## 7 50 reasons why Redhill Aerodrome is not an appropriate location

It is the view of the Parish Council and the vast majority of its parishioners that Redhill Aerodrome is not an appropriate location for Tandridge DC's "garden village" regardless of whether it is 2,500, 4,500, 8,000 or circa 9,000 homes.

Based on Tandridge DC's own, although incomplete, evidence base for this location the Parish Council has identified 50 reasons, listed alphabetically, why the Aerodrome is not an appropriate location for a "garden village".

### Actual Developable Area

7.1 The requirements for major infrastructure, such as a new M23 junction and link road, and other constraints, such as its location on two flood plains, mean that a significant proportion of the land within Tandridge DC's boundaries is not available for residential development.

Given that a "garden village" needs to deliver a significant number of homes to contribute towards Tandridge DC's housing requirement, there are too many "unknowns" about whether this location can provide sufficient volume.

### Air quality

7.2 Although there are currently air quality issues in the immediate vicinity of the Aerodrome, the location's development would lead to an anticipated decrease in air quality across a much larger area.

Tandridge DC's "Sustainability Appraisal" (August 2017) highlights that "*Following occupation, it is anticipated that there will be increased vehicle movements in the potential Garden Village location, potentially impacting air quality in places such as South Nutfield and Redhill. The construction of over 2,000 homes and likely reliance on personal car use in-combination with the likely loss of trees and vegetation that act as a natural air filter are anticipated to maintain poor air quality at the potential Garden Village location (SA Objective 14)*".

### Ancient Woodland

7.3 The small parcels of Ancient Woodland within the Aerodrome location and immediately adjacent to its perimeter, and Furzefield Wood which is a potential Site of Nature Conservation Interest (SNCI) would be harmed if this location was selected.

The existence of such woodland was identified as a "weakness" in Tandridge DC's SWOT analysis of this location (Spatial Approaches Topic Paper: Garden Village Consultation, August 2017), and its "Sustainability Appraisal" highlights that "*Given the scale of development at the potential Garden Village location, there is the potential for these areas of Ancient Woodland to be adversely effected through increased recreational pressure, reduced air quality and loss of supporting habitat*" (page 49).

### Area of Outstanding Natural Beauty (AONB)

7.4 Development would adversely impact upon the setting and views from the proposed extension of the Surrey Hills AONB

Tandridge DC has failed to take account of the proposed extension to the existing Surrey Hills AONB. One of the five strengths identified in its SWOT analysis of this location was "No AONB" ("Spatial Approaches Topic Paper, August 2017). This is clearly incorrect, as its own "Tandridge District

Landscape and Visual Assessment” (August 2017) acknowledges that *“The outlook from the Greensand Way and the setting to a candidate area of the AONB, to the north, is a constraint to development. Views from the Greensand Way above the village of South Nutfield include the north facing fields close to Staplehurst Farm which are prominent and unrelated to the airfield. The aerodrome buildings are noticeable in the view as are the central and southern areas of the airfield; the northern extents of the airfield are partially screened by the intervening trees and hedgerows. These are middle distance views from the Greensand Way, where the potential development area is open to view and would be seen in conjunction with South Nutfield leading to visual coalescence. 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”.*

7.5 It is not possible to screen development at this location as the promoter envisages.

As the Aerodrome is effectively located in a “bowl” surrounded by ridges, not just the from the Greensand Way as noted above, it will not be possible to fully screen a “garden village” from these viewpoints and the issue of visual coalescence would seem to be unresolvable.

### **Benefit to Tandridge DC’s residents and businesses**

7.6 A key aspiration for Tandridge DC is that a “garden village” would deliver wider benefits to its residents and businesses, yet this location would not provide any.

In its SWOT analysis for this location Tandridge DC highlights that *“access to the area from Tandridge is difficult”* (“Spatial Approaches Topic Paper: Garden Village Consultation”, August 2017). Likewise the consultation assessment *“Information which has been considered to date places predominant emphasis on the ability of resident in the Garden Village to access connections and facilities outside of Tandridge and the Council do wish to understand how improvements could support Tandridge, its residents and the economy and businesses in this district”* (page 43, Local Plan: Garden Villages Consultation, August 2017).

7.7 Selecting this location would be in contravention of a key aim of Tandridge DC’s “Local Plan - Preferred Strategy” (March 2017).

This location’s assessment is flawed as Tandridge DC has ignored the above issue in its “Current Overall Conclusions”. In its assessment of “Land – West of Edenbridge” it highlights that *“the Council’s preferred strategy was determined on reflection of the need for infrastructure improvements and community benefit for Tandridge residents and businesses”*, and development *“of this site will inevitably provide more benefits for residents of Sevenoaks given the proximity to Edenbridge and the distance from settlements within Tandridge district. As such, in going forward, the assessment of this location will need to clearly understand what benefit, if any, this location would contribute to the wider sustainability and betterment for Tandridge residents and how it meets the vision and objectives for the Garden Village”* (pages 36 and 37).

In the Parish Council’s opinion the same conclusion applies to this location, as clearly it would provide more benefits for the residents and businesses located in Reigate and Banstead given the distance from Tandridge DC’s urban settlements.

### **Community safety**

7.8 This location should be retained as an operational airfield, as it plays an important role in providing emergency services to Surrey and also the adjoining counties of Sussex and Kent.

Tandridge DC has failed to take account of the public safety and security benefits of co-locating the Police and Kent Surrey and Sussex Air Ambulance and the additional flight time if the Police helicopter were to be based outside of the county

While the promoter has indicated that an alternative base will be found for the Air Ambulance, there is no mention of it housing the Surrey Police helicopter. At its previous base (Fair Oaks Airport, also now a potential “garden village” location) the Police helicopter was twice vandalised and was out of use while the damage was repaired. Once airworthy it was located out of the county to RAF Odiham in Hampshire increasing response times (<http://news.bbc.co.uk/1/hi/england/surrey/8172228.stm>).

## Contamination

7.9 Although this is a green field site, some of the land at this location is already known to be potentially contaminated and if this is the case will need to be remediated (paragraph 3.5.8, “Sustainability Appraisal”, August 2017).

The Parish Council is concerned that the extent of this contamination may be more significant than anticipated due to the Aerodrome’s previous military use. It believes that a full survey should have been undertaken before the Aerodrome was selected as a potential location. If this is indeed the case, then this will further undermine the viability of this location (as discussed in Land Value Capture).

This location has been an operational aerodrome since the 1930s. From 1937 onwards it was used by the RAF initially for training, then from 1940 onwards as an operational base from which a large number of squadrons, flying predominantly a variety of fighter aircraft were based. Towards the end of hostilities it became the largest bomb storage ground in the south east before returning to civilian use from 1947 until the present (although flying use was suspended from 1954 – 1959).

7.10 Development at this location is likely to contribute to further soil contamination, local soil loss and erosion on what is considered to be high value agricultural land.

Tandridge DC’s Sustainability Appraisal (August 2017) highlights that “*Development is considered likely to increase the risk of soil contamination, local soil loss and erosion of what is considered to be “the best and most versatile agricultural land”*” (paragraph 3.5.8, *ibid*).

## Deliverability

There are a number of cross - cutting issues that both individually and collectively undermine the deliverability of a “garden village” at this location, and to demonstrate their inter-relationship these have been collected together under this heading. All of these demonstrate that this location should not be considered for the current plan making period, and that an alternative location needs to be selected.

### Cross border working

7.11 There is no formal support from Reigate and Banstead BC for any development at this location.

In its SWOT analysis of this location Tandridge DC identified as a “weakness” that a “*notable extent of the area falls within [a] neighbouring Borough’s boundary*” (Spatial Approaches Topic Paper: Garden Village Consultation, August 2017). Yet Tandridge DC has not adequately considered these in its assessment of this location.

In its assessment of the “Land – West of Edenbridge” location Tandridge DC has recognised that “*A significant obstacle for this location at this point in time is the time-frame for deliverability and its cross-border location, which straddles the boundaries of Tandridge and Sevenoaks administrative areas. Whilst the mechanism of the duty to cooperate is in place to ensure that the consideration of this site can continue and will play a fundamental role in establishing the suitability of this location and its deliverability, it cannot be ignored that Sevenoaks and Tandridge are at different stages of the respective plan-making stages. This location would only be possible through jointly working with Sevenoaks who would also need to agree to the suitability of and allocate this location in their own plan. The current draft Local Plan document for Sevenoaks gives no clear indication that the location*

*west of Edenbridge is a preferred part of their strategy” (page 36 Local Plan: Garden Villages Consultation).*

This is exactly the same in respect of Reigate and Banstead BC’s plan making process. At its June 2017 meeting with Thakeham Homes Tandridge Councillors specifically highlighted their concern that the two districts were at different stages of their plan making. At present, this location is “...one of many potential post-2027 development opportunities that are being tested by Reigate and Banstead BC...” (page 47 *ibid*).

Given the above the Parish Council does not understand why Tandridge DC has not reached the same conclusion in respect of this location, namely that *“if [its] suitability were to be established the Council are concerned that development would not commence within a time-frame that could contribute to meeting any of Tandridge’s needs for the plan period which could be an unsound approach and highly challenged. In this respect the allocation would only be able to be supported as a potential location for development beyond the Tandridge Local Plan period of 2033”* (page 36, Local Plan: Garden Villages Consultation).

### **Necessity for a new M23 junction**

7.12 The likelihood of Highways England (the authority responsible for England’s motorways) approving a new junction to serve this location is problematic (page 67, “Duty to Cooperate Statement Update”, August 2017).

Thakeham Homes, Reigate and Banstead BC and Tandridge DC are all in agreement that this location cannot be developed unless there is a new junction on the M23 to provide access (Tandridge DC’s Garden Village Challenge Meeting, 27 June 2017 and letters from Reigate and Banstead BC to the Secretary of State for Transport). Yet Tandridge DC has failed to adequately assess the likelihood of Highways England approving a new motorway junction to service this location.

Tandridge DC’s consultation assessment only refers to the information that it has obtained from Surrey County Council (responsible for all roads except motorways). This is surprising given that Tandridge DC has included a letter dated 28 July 2017 from Highways England in its “Duty to Cooperate Statement Update” (August 2017). This sets out in some detail its requirements, and highlights that it was in receipt of a number of other requests for improvements which may conflict with the building of a new junction for this location.

The Parish Council is aware that the Local Enterprise Partnership (“Coast to Capital”) has raised a number of proposed improvements, which on the face of it appear to be more compelling than providing a junction to facilitate the building of a “garden village” (page 58, “Duty to Cooperate Statement Update”, August 2017).

### **Time frame for provision of a new M23 junction**

7.13 Even if Highways England gave approval the earliest that work could start on this junction would be 2025/2026, as its policy is to minimise disruption by either ensuring “...that either all required works to our network take place in one short timeframe or they are done separately: say 5 years apart” (Highways England, page 70, “Duty to Cooperate Statement Update”, August 2017).

With Highways England scheduled to commence the M23 upgrade (Smart Works junctions 8 -10) in March 2018 (with an expected completion date of 2020), work on constructing a junction could not commence until probably five years after the completion of these works.

As this location is only serviced by a rural road network and in light of the existing identified traffic constraints, the Parish Council’s view is that no development can commence until this junction is fully operational. To allow construction of a “garden village” before then would mean construction traffic either using already congested roads or unsuitable narrow roads.



As in reason 11 above this means that this location cannot deliver the required quantum of homes in the 2013-33 Local Plan period.

### **Ensuring the early delivery of infrastructure**

7.14 Thakeham Homes' proposed build out rate of 150 - 300 homes per annum would not enable the necessary social, economic, physical and community infrastructure to be in place and fully operational for many years.

Tandridge DC has already assessed that infrastructure in the adjoining communities is inadequate to meet the needs of a new settlement at this location. Furthermore, DCLG's expectation is that the build out rate of a "garden village" would be higher than is usual on private market led developments (paragraph 24, "Locally-Led Garden Villages, Towns and Cities", 2016).

### **Reigate and Banstead BC's commitment to a "garden village"**

7.15 Without a commitment from Reigate and Banstead BC to buy into Tandridge DC's "garden village" aspirations this location cannot be developed.

It is unacceptable that Tandridge DC has not obtained an "in principle" commitment from Reigate and Banstead BC prior to issuing this consultation. There is no reference to Tandridge DC sharing its aspirations for its "garden village" concept at the joint meeting held with Reigate and Banstead on 24 May 2017 (page 22, Duty to Cooperate Statement Update, August 2017). Nor has Tandridge DC provided any evidence that Reigate and Banstead BC has any political commitment to the provision of a "garden village". Certainly this is not mentioned in the letters sent by its Council Leader and Chief Executive to the Secretary of State for Transport lobbying for such a junction where there is a focus on the wider transport benefits that such a junction would bring to their borough (pages 63 – 65, *ibid*).

### **Density**

7.16 The likely density for a "garden village" at this location is too high for a settlement in a rural location.

Although Thakeham Homes has not provided any information on density, based on the information currently available it appears that its density would be either be at the top or in excess of Tandridge DC's current Core Strategy Policy 19 for a rural area and in the mid-range for a built up area.

### **Employment**

7.17 Tandridge DC is ignoring its own emerging Local Plan policies in considering this location for a "garden village".

In its "Our Local Plan Preferred Strategy" (March 2017) Tandridge DC identified that one of the five key developmental needs that it needed to meet was "*supporting economic growth through intensification and/or expansion of existing employment sites, where appropriate; and by allocating additional employment land in sustainable locations to support the local and rural economy*" (paragraph 6.2).

The above commitment reflects the requirement that "*significant weight should be placed on the need to support economic growth through the planning system*" (Paragraph 19, National Planning Policy Framework).

7.18 By continuing to explore the possibility of using this location for its "garden village" Tandridge DC is in contravention of the National Planning Policy Framework (NPPF).

Under the NPPF Tandridge DC has an obligation "*To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century*" (paragraph 20, NPPF). Having acknowledged that there is a shortage of employment sites within its district, Tandridge DC appears to be ignoring the recommendation of its

own “Economic Needs Assessment” (November 2015) that the Aerodrome should be designated as Strategic Employment Land.

7.19 Tandridge DC is aware that many of its residents have to commute to neighbouring authorities or London for work because of the limited employment opportunities within its district.

Its Sustainability Appraisal (August 2017) identifies this location as providing the “main source of local employment with 26 businesses [note that this now increased to 40 – see 20 below] based at this location” and concluded that “*These are likely to be lost should development at this potential Garden Village location go ahead*” (paragraph 3.5.6).

7.20 If this location was selected for a “garden village” Tandridge DC would be in contravention of the National Planning Policy Framework (NPPF).

Tandridge DC would be failing its planning obligations that require it to place “*significant weight ... on the need to support economic growth through the planning system*” (paragraph 19) and to “*support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances*” (Paragraph 21).

This is a thriving employment location where the number of businesses located there has recently risen to 40. Its owners are marketing the Aerodrome as “*a small business park offering a wide range of competitively priced accommodation that ranges from a simple office up to aircraft hangars, warehouses and storage units*”. In addition a new business centre has recently been launched offering furnished office accommodation for new businesses and those downsizing (<http://redhillbusinesscentre.co.uk/location/>).

## **Flood risk**

7.21 There is a long history of fluvial flooding at this location.

Tandridge DC’s “Landscape and Visual Assessment” (August 2017) notes that not just the Aerodrome but the surrounding eastern and southern areas are on Redhill Brook and Salfords Stream floodplains. Its conclusion is that the “*floodplain is not suited to built development*”. Similarly its “Ecological Appraisals of Potential Garden Village Locations” (August 2017) reaches the same conclusion, namely that the Redhill Brook and Salfords Stream corridors are undevelopable (paragraph 3.9).

Despite the above in assessing this location Tandridge DC appears to accept the promotor’s view that this flooding is solely due to Redhill Brook being in a culvert that does not have the capacity to deal with prolonged heavy rain and that opening it up would resolve the issue. There is no independent robust evidence to support this view.

7.22 This location also suffers flooding from surface water and /or ground water flooding due to the Aerodrome being on Wealden Clay (<http://www.bgs.ac.uk/discoveringGeology/geologyOfBritain/viewer.html>).

Because of its focus on fluvial flooding, Tandridge DC has failed to fully assess the flood risk from other sources. Its SWOT analysis of this location identifies surface water flooding as a weakness (Spatial Approaches Topic Paper: Garden Village Consultation, August 2017).

Its “Sustainability Appraisal” (August 2017) highlights that both Flood Zones 3 and 2 together with further areas of land “*are also at high risk of surface water flooding and groundwater flooding*” (paragraph 3.5.9). Furthermore, it points out that “*Development at this location could potentially result in the loss of a substantial quantity of green infrastructure which may diminish ecosystem services in relation to mitigating flood risk*”.

7.23 The impact of mitigating flood risks at this location upon adjoining land and settlements has not been addressed.

Given the three potential sources of flooding at this location, Tandridge DC's failure to consider the impact of implementing flood management measures at this location on adjoining land and settlements is in contravention of NPPF Paragraph 100 that which states that "*Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere*".

### **Free-standing settlement**

7.24 Developing a "garden village" at this location is contrary to DCLG guidance.

DCLG's "Locally-Led Garden Villages, Towns and Cities" (2016) emphasises that a "garden village" "*must be a discrete settlement, and not an extension of an existing town or village*". Tandridge DC's SWOT analysis identified the closeness of existing settlements to this location as a "weakness" ("Spatial Approaches Topic Paper: Garden Village Consultation", August 2017).

Even Thakeham Homes' original proposal of 4,500 homes (December 2016) could have been seen as an extension of either Whitebushes or South Nutfield. If the promoter was allowed to build 8,000 – 9,000 homes, then effectively Salfords, South Nutfield and Whitebushes would become a single large urban area and there is also a danger of merging with Earlswood and the former Redhill RNIB site that is currently being developed for housing.

### **Gatwick Safeguarding Area**

7.25 Development at this location potentially contravenes the requirements of the Gatwick Safeguarding policy.

Tandridge DC has failed to fully consider the possible adverse effects of developing this location on Gatwick Airport's operations. For example, the proposed introduction of open water areas which will attract birds.

### **General Aviation Infrastructure**

7.26 Redhill Aerodrome is an important regional general aviation facility for commercial helicopter operations and recreational pilots and also has training facilities, both helicopter and fixed wing, for those interested in a career in aviation or wishing to fly recreationally.

Although the Parish Council has objected to previous plans to build a hard runway, it recognises the national need to retain a network of general aviation airports and aerodromes. If this location was developed, then in all probability Surrey would no longer have a general aviation airport as its other two at Fairoaks and Dunsfold are threatened with closure with both being at an advanced stage in plans to redevelop them for housing. The nearest alternative is at Biggin Hill, but its owners are looking to focus on business aviation at the expense of general aviation.

The Aerodrome's owners have recently re-aligned a paved taxi-way (which was undertaken without planning permission and a retrospective application is currently being considered by Reigate and Banstead BC). Subject to planning permission being granted, this will allow fixed winged aircraft to continue to fly even when the grass runways cannot be used due to waterlogging.

### **Green Belt**

7.27 Tandridge DC may have based its selection of this location on incorrect information.

In its “Spatial Approaches Topic Paper: Garden Village Consultation” (August 2017) one of the five strengths of this location was its status as “*brownfield land*”. This is incorrect as its Sustainability Appraisal (August 2017) correctly notes “...*the majority of Redhill Aerodrome is considered a greenfield site, including the grass runway area*” (paragraph 3.5.5.).

7.28 Although all four potential locations are in the green belt, the Aerodrome differs from the others because its green belt status has recently been legally tested and upheld.

In 2014 its green belt status was tested in the Court of Appeal (Civil Division) on appeal from the High Court of Justice, Queens Bench Division Planning Court (CO/1361/2014). This ruling has also set a precedent for subsequent legal cases and has not been superseded.

7.29 The Aerodrome’s green belt status prevents coalescence of settlements.

Currently this location prevents the merging of the settlements of Earlswood, Salfords, South Nutfield and Whitebushes. However the promoter’s wish to build, what Tandridge DC would define as an “urban settlement” (Settlement Hierarchy, 2015) connecting these would be in direct contravention of this objective.

## Infrastructure

7.30 Permitting residential development at this location would not generate a sufficient uplift in its value to fully fund the infrastructure required.

Although “*Planning permission can increase the value of agricultural land one hundredfold or more*” (“Future of cities: land value capture”, Government Office for Science, 2016), the Aerodrome has an existing use value in excess of that for agricultural land due to its commercial operations, so reducing the value of the uplift.

While Thakeham Homes, unlike the other promoters, has not provided an estimate of the likely infrastructure costs for this location, there is mention that circa £178 million would be available, of which some £110 million appears to have been set aside for a new M23 junction (Highways England letter of 28 July 2017, page 70, “Duty to Cooperate Statement Update, August 2017).

In the Parish Council’s views the costs of the M23 junction alone would swallow a sizeable proportion of the total funding and be far in excess of £110million offered by Thakeham Homes. Based on Highways England’s own figures the Parish Council estimates that the cost of a two bridge junction, that is without the access road, is likely to be well in excess of £50 million (<http://roads.highways.gov.uk/projects/m49-avonmouth-junction/>), and the publicly available figure for building a dual carriageway access road is £57.89 million per mile (<http://roads.highways.gov.uk/projects/a5-to-m1-link-dunstable-northern-bypass/>).

## Land Value Capture (capturing the uplift in land value arising from the granting of planning permission)

7.31 A reliance on an Area Action Plan and S106 contributions at this location will not deliver the required funding to fully meet the costs of the required infrastructure.

The Royal Town Planning Institute has recognised that communities are not benefitting as much as they should from the uplift in land values when planning permission is granted. It has recently commissioned a research project to investigate different ways of funding infrastructure through capturing the uplift in land value resulting from the granting of planning permission and public investment being made on or near a piece of land.

The 2014 Wolfson Economic Prize asked the question ““How would you deliver a new Garden City which is visionary, economically viable, and popular?”, and the general consensus of all the finalists was that “land value uplift had to be harnessed more effectively into building infrastructure and long term maintenance” (Future of Cities: Land Value Capture, Government Office for Science, 2016).

In the Parish Council's opinion there is only one way of guaranteeing that the infrastructure required at this location will be fully funded, namely if Tandridge DC and Reigate Banstead BC assume most of the financial risk. Effectively they would assume the roles of "scheme promoter and master developer" as by doing so "...the public sector can actually produce a net risk reduction, lowering the costs of development and enabling greater profits all round" (ibid).

There is no shortage of research or examples both in the UK and Europe demonstrating that this is the case. In the UK the most recent example of this approach is the development of the London Olympic Park (now Queen Elizabeth Park) where the public sector took responsibility for buying out and re-locating the existing residents and commercial enterprises, remediating the land and building the stadia, athletes' accommodation and other necessary infrastructure.

The public sector also took most of the risk in developing the New Towns. Taking the greater share of the uplift in land value meant that these resources could then be used to provide community infrastructure.

## Listed buildings

7.32 Selecting this location would have a detrimental effect on the setting of a significant number of listed buildings.

Tandridge DC's Sustainability Appraisal only focused on the land within the Aerodrome's existing boundary, but it noted that "*there are ten Grade II Listed Buildings within 100m of the edge of the perimeter*" and that the "*setting of these buildings may be adversely affected by development of this potential Garden Village location*" (paragraph 3.5.3).

## Low Weald Farmland

7.33 There would be a loss of high grade farmland.

According to Tandridge DC's Sustainability Appraisal this location contains "...approximately 50% Grade 3 agricultural land and 50% Grade 4.....It is anticipated that some of the best and most versatile agricultural land may be lost" if this location was developed (paragraph 3.5.8).

7.34 Developing at this location would be contrary to existing guidance.

Tandridge DC has failed to take account of the development guidance for Low Weald Farmland (Surrey Landscape Character Assessment: Tandridge District 2015). Its own "Sustainability Appraisal" (August 2017) highlights the development guidance for such land includes policies to "*Conserve the rural, largely, unsettled landscape....Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement...Conserve and enhance the landscape setting to villages and edge of settlement*" (paragraph 3.5.12).

## Mole Gap to Reigate Escarpment Special Area of Conservation

7.35 A garden village at this location would have an impact on this Special Area of Conservation.

Tandridge DC has only noted and not investigated in its assessment the potential impact of development at this location from nitrogen deposition and recreational disturbance. Clearly the issue of nitrogen deposition is particularly relevant to this location given the likely increase in traffic passing through the area, as nitrogen is produced by fossil fuel combustion.

## Noise

7.36 Tandridge DC has failed to assess the noise impact of development at this location upon the adjoining green belt communities and land.

While there are short and intermittent bursts of noise from the Aerodrome's operations, the development of this location would introduce more sustained noise disturbance from a wide range of sources.

## Public Transport

7.37 A "garden village" at this location would increase personal car use.

Tandridge DC's assessment of the potential use of public transport at this location overlooks the finding of its own Sustainability Appraisal that "*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*" (paragraph 3.5.7).

7.38 There is no consistency across the four locations in how access to existing public transport has been assessed.

For consistency the same criteria should have been used for all four locations, namely the distance to transport nodes and whether these are within an acceptable walking distance. Only at this location is the acceptability of access to public transport defined by "cycle distance".

Furthermore, an assessment on this basis overlooks that some households, for example those containing young children, having mobility problems and so on will not be able to cycle.

7.39 The information regarding links to public transport at this location is incomplete and inaccurate.

For the reasons set out below the public transport section of this assessment is not fit for purpose. Furthermore, given the likely commencement date of the development, clearly there can be no reliance upon any "in principle" commitments made by the existing transport operators or even their existing provision.

## Bus use

7.40 Diverting existing A23 bus routes is insufficient provision.

The consultation assessment highlights the potential to "*divert bus services off the A23*" to serve the Garden Village and take residents to Redhill, Horley, Gatwick and Crawley. However, this would not benefit or give direct access to any other communities within Tandridge DC, including South Nutfield whose bus service is infrequent, does not operate seven days a week, and has limited capacity as only smaller buses can operate due to the rural roads.

## Rail use

7.41 There is not "*a good train service*" (page 44, consultation document) from Nutfield, Earlswood and Salfords railway stations.

Tandridge DC's assessment contains the proviso that "*...assurances of sufficient services would need to be obtained from Govia / Network Rail*". Tandridge DC already has this information in respect of services on the Redhill to Tonbridge Line, as the promoter of the "Area south of South Godstone" has submitted minutes of its meeting with Govia and also a copy of a letter from this rail operator dated 5 May 2017.

This confirms that there are no plans to increase either the rush hour services (Monday to Friday only) from Nutfield (two trains per hour) or the off peak and weekend service (one train per hour) or to increase the capacity. Even if there was a need for more capacity, then Govia would rather increase the number of carriages rather than run trains more frequently.

In the case of Earlswood / Salfords the existing service provided by Govia is almost as inadequate with all trains calling at these two stations stopping at every station on the line and with them having one more train per hour Monday to Saturday than Nutfield.

## Road Infrastructure

7.42 None of the substantial transport infrastructure improvements required at this location would be of direct benefit to Tandridge DC's communities or its economy.

The eastern link road from a new M23 junction will not improve access to Tandridge DC's retail areas in Caterham and Oxted, and there will be no direct access from within Tandridge to the proposed new economic area to the east of the motorway.

7.43 The proposed road improvements are all located in Reigate and Banstead and do improve the existing rural road network around this location.

Tandridge DC's "Transport & Accessibility Assessment of Potential Garden Village Locations" (August, 2017) highlights "*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*" (paragraph 5.5.3). A similar conclusion is reached in its "Tandridge District Landscape and Visual Assessment" which describes the existing road network in this location, particularly those roads running north and south, as narrow rural lanes.

However, what both fail to mention are the height and width restrictions on all four roads going north from this location towards the A25, all of which pass beneath the Redhill to Tonbridge railway line. In the case of two of these, Mid Street and Egg Arch, there is formal (in respect of the former) and informal (in respect of the latter) single file traffic only through these two bridges.

7.44 Due to reliance on personal car use at this location (paragraph 3.5.7, Sustainability Appraisal, August 2017) the number of vehicles using the rural road network would increase.

Tandridge Councillors raised this issue at its June meeting with Thakeham Homes as the council has acknowledged that that a "garden village" at this location would significantly increase the amount of traffic using these rural roads. In its "Transport & Accessibility Assessment of Potential Garden Village Locations" it estimates that "...during the AM peak hour (08:00 – 09:00) this [increase] could be in the region of 3,500 to 4,000 trips (arrivals and departures)" (paragraph 5.2.1).

7.45 The link road between the M23 and A23 would effectively bisect a "garden village" at this location.

Tandridge DC's assessment of this location fails to take account of the road safety and the "severance" issues that would arise as a result. Residents would need to cross the dual carriage way link road to access the mixed use neighbourhood centre, public transport hub and interchange, and schools, and it is likely to inhibit community cohesion.

7.46 A further pre-requisite for any development at this location should be measures to address the severe congestion issue at the junction of the A23 and Three Arch Road.

Tandridge DC's "Transport & Accessibility Assessment of Potential Garden Village Locations" (August, 2017) reaches the same conclusion "*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*" (paragraph 5.5.2).

7.47 A new M23 junction would compound, not relieve, the existing traffic issues around this location.

This new junction and its link roads provides access onto the Parish's rural road network. This is already used on a daily basis by "rat runners" to avoid the congestion on the A23 and to bypass the peak hour congestion in Redhill for vehicles wishing to travel from the south to the A25 and vice versa. Such a junction would also exacerbate the likelihood of "rat running" whenever there are delays on the M23 or between junctions 6 and 9 of the M25.

7.48 There is no evidence that a new M23 junction would effectively resolve the current inadequate access to East Surrey Hospital as claimed by the promoters.

It is accepted that the present access to this hospital is inadequate and causes traffic congestion for emergency ambulances, outpatients, staff and those visiting inpatients. However, Tandridge DC has not investigated the catchment area for this Hospital, and without this information it cannot properly assess whether the proposed link road from a new M23 junction would improve the current issues.

### **Size of proposed "garden village"**

7.49 A settlement of 6,000 – 8,000 homes is not a "garden village".

Although a "garden village" of 6,000 - 8,000 homes is within size range set out in DCLG's "Locally-Led Garden Villages, Towns and Cities" (2016), it is at the upper limit. However, it would be the approximately the same size as Oxted and Caterham, both of which Tandridge DC defines as urban under its "Settlement Hierarchy" (2015).

### **Sustainable development**

7.50 A "garden village" at this location would not meet the "sustainable development" requirements that fundamentally underpin the NPPF.

Tandridge DC's Sustainability Appraisal (August 2017) demonstrates that a "garden village" on the Aerodrome would only have a strong positive effect on housing and a likely positive effect on health, with the remaining 14 sustainability indicators being negative. Of the four potential locations it has the fewest "green lights" (demonstrating a positive effect), even less than the Chaldon location which Tandridge DC withdrew from consideration before issuing this consultation.

Even if all of Tandridge DC's "garden village" objectives (which in the Parish Council's opinion are seriously flawed) were delivered, the Aerodrome remains the location where their mitigating effects are least successful in improving its sustainability.