

APPENDIX 1 – EXTRACT FROM NUTFIELD PARISH COUNCIL’S RESPONSE TO TANDRIDGE DC’S “LOCAL PLAN: GARDEN VILLAGES CONSULTATION (REGULATION 18)”, 9 OCTOBER 2017

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

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

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

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)

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”*.

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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

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. 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

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 (Fairoaks 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

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).

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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).

10. Development at this location is likely to contribute to further soil contamination, local soil loss and erosion on what is considered to 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 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

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 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).

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Necessity for a new M23 junction

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

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

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).

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Reigate and Banstead BC’s commitment to a “garden village”

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

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

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).

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.

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).

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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

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.

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*”.

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*”.

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Free-standing settlement

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

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

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 Fair Oaks 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

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.).

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 superseded.

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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

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)

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.

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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

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

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).

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

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

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

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).

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

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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.

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

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

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

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.

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

APPENDIX 1 – EXTRACT FROM NUTFIELD PARISH COUNCIL’S RESPONSE TO TANDRIDGE DC’S “LOCAL PLAN: GARDEN VILLAGES CONSULTATION (REGULATION 18)”, 9 OCTOBER 2017

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.

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).

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.

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).

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.

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.

APPENDIX 1 – EXTRACT FROM NUTFIELD PARISH COUNCIL’S RESPONSE TO TANDRIDGE DC’S “LOCAL PLAN: GARDEN VILLAGES CONSULTATION (REGULATION 18)”, 9 OCTOBER 2017

Size of proposed “garden village”

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

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.