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# Examination Statement

## Land at Redhill Aerodrome

### Thakeham Homes

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Reigate & Banstead Borough Council Development  
Management Plan

Examination in Public

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## 1. Introduction

- 1.1. This Examination Statement is submitted by Savills on behalf of Thakeham. Thakeham is the sole promoter of Land at Redhill Aerodrome alongside development partners Quintain.
- 1.2. Prior to the submission of the Development Management Plan (DMP) by Reigate & Banstead Borough Council (RBBC) to the Planning Inspectorate for examination, Thakeham and their consultant team have participated in the formal consultations of the DMP at Regulation 18 stage in October 2016 and Regulation 19 stage in February 2018. In addition, the site has been submitted to relevant call for sites for the Housing and Economic Land Availability Assessment (HELAA) and Thakeham and their consultant team have met with Planning Policy Officers throughout the process to discuss the strategic opportunity at Land at Redhill Aerodrome.
- 1.3. Thakeham made minor objections to the Regulation 19 consultation of the DMP in respect of the area of land identified under reference SAS1, which is was requested was made larger and the need for the policy to include reference to a mechanism for a Joint Area Action Plan within Policy MSL2. These could be accommodated via a Minor Modifications to the Plan.
- 1.4. The Land at Redhill Aerodrome is located across the administrative boundaries of both RBBC and Tandridge District Council (TDC) and therefore Thakeham has also been engaging with TDC as part of the preparation of their emerging Local Plan. Thakeham has made representations to the Sites Consultation (Regulation 18) in December 2016, Garden Village Consultation (Regulation 18) in October 2017 and the most recent Regulation 19 consultation in September 2018.
- 1.5. The location of the site, its surroundings and the vision for the Garden Village at Redhill Aerodrome were set out in detail in the representation to the Regulation 19 DMP Consultation and have therefore not been reproduced in this statement.

## 2. Response to the Inspectors Questions

- 2.1. Thakeham has informed the Programme Officer that they wish to participate at the hearing sessions relating to Matter 11 and will be represented by Savills at this Hearing.

### **Matter 11 Policy MLS2 - Safeguarded land for development beyond the plan period.**

ISSUE: Whether there is a need to safeguard land and whether the policy is justified effective and consistent with national policy in the NPPF.

#### **1. What is the background to the need to safeguard land for future development? Why is it necessary? Is this policy effective, justified and consistent with national policy and the Core Strategy?**

##### Background to Need & Necessity

- 2.2. The safeguarding of land for future development within Reigate & Banstead Borough reflects the proactive approach the Council are taking in respect of meeting their future housing and infrastructure needs. The Council has acknowledged that the Core Strategy housing target is likely to increase as part of the Local Plan Review and have acknowledged that there will likely be a need to release land from the Green Belt in order to meet housing need within the DMP and the Local Plan review in due course.
- 2.3. The safeguarded land proposed in the DMP would be brought forward to meet need in the period post 2027. It is necessary to safeguard the land in order to protect it from other forms of development, if it is required for redevelopment to support the future development needs of the Borough. The safeguarding of the land will allow for relevant evidence base to be progressed in the early stages of the Local Plan review. This safeguard also facilitates the potential future joint working on an area specific local plan between RBBC and TDC.
- 2.4. At the Local Plan Review, the Council will be required to calculate their OAN on the basis of the Standard Methodology, which is currently estimated at between 635-644 dpa (noting the update household projections). This is clearly significantly higher than the 460 target set out in the Core Strategy and will be the figure to which the DMP will conform too. Given that the Core Strategy acknowledges the potential to release land from the Green Belt in order to meet a housing target of 460dpa and the inclusion in the DMP of sites within the Green Belt for allocation, albeit on a phased development, it is highly unlikely that the Council would be able to meet the higher OAN without the use of Green Belt land. The safeguarding of land now will allow for the site to be reviewed through the next Local Plan and to be brought forward as quickly as possible to start delivering towards this higher housing figure.
- 2.5. In addition, the safeguarding of the land allows for more productive cross boundary discussions to occur between RBBC and TDC to ensure that the most sustainable form of development comes forward across the two authorities. Whilst TDC has presently indicated that they propose to move forward with South



Godstone as their chosen Garden Village location, their Local Plan is still at an early stage and can only be given “very limited weight”. There is every opportunity for the strategy of this Plan to be altered and given that RBBC are at this stage only safeguarding this land for future release from the Green Belt, the emerging TDC plan should not prevent RBBC from taking this proactive approach. This is discussed further below at paragraph 2.31.

2.6. The Green Belt Review sets out that: *“it was important that the Council consider the issue of safeguarded land beyond the end of the plan period in order to ensure that the DMP is compliant with national policy. Without considering this issue, the Council could not be sure that the Green Belt boundaries would endure beyond the end of the plan period”* (paragraph 6.82). The Green Belt Reviews goes on to set out that: -

*“The current pattern of urban and windfall development, and additional analysis from the HELAA, suggests that there is unlikely to be sufficient unconstrained land within the existing urban area to fully accommodate housing needs beyond the current plan period...Safeguarded land outside of the urban area would protect existing towns from over-development which could affect the character of the towns and the provision of the necessary infrastructure for residents”* (paragraph 6.85) and that: *“In summary, development pressures within the borough are expected to continue beyond the end of the current plan period. It is unlikely that this pressure can be directed entirely within the urban area, and it was therefore considered to be necessary to look at safeguarding land within the Green Belt”* (paragraph 6.86).

2.7. The safeguarding of land is therefore necessary to:

- Ensure the most sustainable options for development are kept available in order to meet the future housing need of the Borough and ensure the Green Belt boundaries do not require further alteration;
- Facilitate productive cross boundary working between RBBC and TDC;
- Facilitate the efficient review of the Local Plan and production of evidence base to ensure the delivery of development as quickly as possible;

Consistency with National Policy

2.8. The DMP will be examined against the policies contained in the National Planning Policy Framework (2012) (NPPF). The Core Strategy was also examined against this national policy. The relevant policies of the NPPF in respect of the safeguarding of land for future development are set out below:

	NPPF (2012)	DMP
Identifying future development land	Paragraph 47 outlines that local planning authorities should <i>“identify and update annually a supply of specific, developable sites or broad location for growth for years 6-10 and where possible for years 11-15”</i>	Redhill Aerodrome would be delivered in the period post 2027, which sits beyond the plan period, but within the present 10 year period. It is pertinent to safeguard this opportunity.

<p>New Settlements</p>	<p>Paragraph 52 sets out that <i>“the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoin any such new development”</i></p>	<p>Redhill Aerodrome would deliver a new standalone settlement in line with Garden City principles as set out in detail in the submissions made by Thakeham. The safeguarding of the land in the DMP is therefore in line with the NPPF.</p>
<p>Green Belt Review</p>	<p>Paragraph 83 sets out that <i>“Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. At the time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long terms, so that they should be capable of enduring beyond the plan period”</i>.</p>	<p>The NPPF recognises that Green Belt boundaries should only be altered in exceptional circumstances. The opportunity to release land has already been established by the Core Strategy. It also highlights the need to ensure that Green Belt boundaries have permanence and endure beyond the plan period which is a key justification for safeguarding the land at Redhill Aerodrome.</p>
	<p>Paragraph 84 sets out that <i>“when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.”</i></p>	<p>The Council are taking account of the future sustainable patterns of development and have considered the options for future development within the Sustainability Appraisal (as discussed further below) and at this stage have found Redhill Aerodrome to be the best possible future options and have therefore taken this into account when reviewing the Green Belt.</p>
	<p>Paragraph 85 sets out that <i>“when defining boundaries, local planning authorities should”</i>:</p> <ul style="list-style-type: none"> <li>▪ <i>“ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;</i></li> <li>▪ <i>where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;</i></li> </ul>	<p>In safeguarding the land at Redhill Aerodrome, RBBC are fulfilling the criteria set out at paragraph 85 in respect of reviewing the Green Belt. This approach is therefore wholly in line with the NPPF.</p>

	<ul style="list-style-type: none"> <li>▪ <i>make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;</i></li> <li>▪ <i>satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period”;</i></li> </ul>	
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Consistency with Core Strategy:

2.9. The DMP directly follows on from the Core Strategy, adopted in 2014 and both plans will cover the period 2012-2027. Policy CS3 of the Core Strategy specifically refers to the safeguarding of land and states:

*“Land may also be safeguarded through the DMP in order to provide options to meet development needs beyond the plan period. Safeguarded land will only be allocated through a subsequent local plan review and will be subject to Green Belt policy until such time.”*

2.10. And that this will be implemented through the DMP including the *“safeguarding of land to meet longer term development needs, and associated amendments to Green Belt boundaries on the Policies Map”*

2.11. In respect of the spatial strategy set by the Core Strategy, the key elements relevant to Redhill Aerodrome include:

- *“Our spatial strategy acknowledges that, as development opportunities within the urban area become more limited, some development on land outside the current urban area will be required. Such development will only be acceptable in the most sustainable locations, and Green Belt boundaries will only be altered in exceptional circumstances, and through the plan making process” (Para 5.1.13 & 5.1.14)*
- *“A detailed Green Belt review will be carried out to inform the DMP. This review will assess the extent to which parcels of land contribute to the purposes and integrity of the Green Belt (as identified in national policy). It will identify where boundaries can be revised to align with clear physical features and without compromising the essential characteristics of the Green Belt.” (Para 5.3.5)*
- *“National policy also requires that Green Belt boundaries should be capable of enduring beyond the plan period. Further work will be undertaken as part of the DMP – based on both existing evidence and new studies such as the detailed Green Belt review – to consider where land should be safeguarded. Safeguarded land to meet development needs beyond the current plan period would only be allocated for development through a Local Plan review process” (Para 5.3.6)*

2.12. A detail Green Belt review was undertaken in October 2017 and this identified Redhill Aerodrome as the

preferred site for safeguarded land beyond the end of the plan period. The safeguarding of land is therefore consistent with the Core Strategy.

Is the policy Effective and Justified?

- 2.13. The Council has undertaken a Green Belt Review which included the review of the land at Redhill Aerodrome and options for the safeguarding of land have been assessed in the Sustainability Appraisal. These assessments have considered alternatives including whether or not to safeguard any land in the DMP and options for different sites to be safeguarded and have concluded that the land at Redhill Aerodrome is the most appropriate location for safeguarding. The DMP in respect of Policy MLS2 is therefore the most appropriate strategy and is based on proportionate evidence and is therefore justified.
- 2.14. Policy MLS2 facilitates, if required, the land at Redhill Aerodrome coming forward for development in the next plan period. The policy is non-prejudicial and effectively evokes no change within the plan period. The policy is therefore considered to be effective.

**2. Does the DMP clearly identify and demonstrate the exceptional circumstances necessary to justify releasing land from the Green Belt to become safeguarded land for development beyond the plan period?**

- 2.15. Yes. The Core Strategy at paragraph 5.3.3 identified that in exceptional circumstances land may be removed from the Green Belt and that the *“the exceptional circumstances test will include consideration of the need for development, the suitability and availability of sites to accommodate that development, and will require demonstration that removal of land will result in no or limited conflict with the purposes and integrity of the Green Belt”*

- 2.16. Core Strategy Policy CS3 sets out:

*“In exceptional circumstances land may be removed from the Green Belt and allocated for development through the plan making process. Exceptional circumstances may exist where both (a) and (b) apply:*

- a. There is an overriding need for the development in order to secure the delivery of the strategic objectives and policies of the Core Strategy, and either:*
- (i) The development proposed cannot be accommodated on land within the existing urban area or on land which is in the countryside beyond the Green Belt; or*
  - (ii) The development of land within the Green Belt would represent a significantly more sustainable option than (i).*
- b. There is no or limited conflict with the purposes and integrity of the Green Belt.”*

- 2.17. In respect of Redhill Aerodrome, the Green Belt Review found that the Site contributed to:

- Purpose 1 to check the unrestricted sprawl of large built-up areas – Moderate
- Purpose 2 to prevent neighbouring towns merging into one another – High

- Purpose 3 to assist in safeguarding the countryside from encroachment – Moderate
- Purpose 4 to preserve the setting and special character of historic towns – Low
- Purpose 5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – Low

2.18. The Green Belt Review also identifies at paragraph 6.95 that in respect of purpose 2, the proposed development would include green buffer zones maintaining a separation from South Earlswood and Salfords and these would be made clear in any future site allocation. Paragraph 6.96 goes on to state that:

*“By safeguarding the land for the buffer zones, continued settlement separation can be ensured in the future, supporting the purposes of the Green Belt. Therefore it is felt that although there is some conflict with the purposes of the Green Belt, the conflict is not serious and can be mitigated”.*

2.19. It has been established through the DMP that the development needs of the Borough cannot be accommodated on land within the existing urban area or non Green Belt land. The Green Belt Review sets out that: *“In the current plan period, the borough has an objectively assessed housing need of 600-640 dwellings per year. However, as was accepted during the Core Strategy examination, due to the numerous constraints on development within the borough, only a target of 460 homes per year can be achieved – and as shown above, even this target can only be reached with the use of urban extensions on Green Belt land”* (paragraph 6.83). The DMP and any future Local Plan will therefore need to consider Green Belt release in order to meet future housing need fulfilling criteria a (i) of Policy CS3.

2.20. The Green Belt Review, Sustainability Appraisal and Safeguarded Land Report and Appendices outline the exceptional circumstances. The exceptional circumstances in respect of the Land at Redhill Aerodrome include:

- The need to meet future development needs of the Borough post 2027 in line with the standard methodology;
- The lack of availability of land within urban areas or outside of the Green Belt to meet the future development needs of the Borough;
- To protect the existing towns from over development affecting character and provision of necessary infrastructure;
- Support the potential to deliver a Garden Village;
- Delivery of a significant number of homes including market and affordable tenures to meet future development needs;
- Delivery of a large amount of employment uses and construction jobs;
- Delivery of new sustainable transport options;
- Delivery of significant amounts of open space, recreation and health facilities;
- Removal of existing contamination in the Borough (if present)
- Facilitating new access to East Surrey Hospital;

### 3. What sites were considered and why was Redhill Aerodrome selected and others rejected?

2.21. The Sustainability Appraisal (May 2018) (SA) appraised 3 options in order to assess whether or not to safeguard land, as set out below:

- Option 1 – do not safeguard land
- Option 2 – safeguard land for a particular time period after the end of the current plan period
- Option 3 - safeguard land using a supply led approach

2.22. Option 1 was found to have the most negative impacts:

*“Failing to safeguard land beyond the end of the plan period could have serious implications. It is arguably not compliant with national policy, but it would also leave open the possibility that at the end of the current plan period the borough faces a shortfall in housing land, which could lead to planning by appeal and its attendant impacts on issues like biodiversity, heritage assets, and landscape”.*

2.23. As set out from paragraph 4.38 onwards five spatial options for safeguarding land were considered based on different sizes and locations of potential safeguarded land were developed by officers including Option 5 which was a standalone settlement. The preferred option was Option 5 and the SA sets out that:

*“The preferred alternative is Option 5, a large standalone settlement – this would have the biggest impact on providing housing, and would also be able to provide employment options, community facilities, and potentially new public transport. There would potentially be a large impact on landscape character, but mitigation may be possible depending on the choice of site.” (page 22)*

2.24. Paragraph 4.43 onwards that 37 sites were considered for safeguarding, identified from the work undertaken as part of the Core Strategy, DMP Regulation 18 consultation and HELAA. Many of these scored positively in respect of housing and economic issues but scored more poorly in respect of sustainability and landscape impact primarily due to their location away from town centres and public transport. From the analysis of the 37 sites SAS1 was chosen and was found to be ‘one of the few sites that could be said to meet the preferred spatial option of a large, standalone settlement’ (para 4.45).

2.25. The initial assessment of 3 options in respect of whether to safeguard land and a further 5 spatial options for the type and scale of land to be safeguarded, it is considered that the SA has adequately appraised whether the safeguarding of land for a new settlement is the most sustainable approach at this stage. The assessment of 37 sites for safeguarding identified through the existing evidence base, against the sustainability objectives has led to Redhill Aerodrome being chosen as the preferred option. Other sites were rejected on the basis of:

- Scale in respect of not being capable of meeting the preferred option of creating a standalone settlement;
- Poor sustainability and a lack of potential to provide this through the development;
- Impact on landscape and lack of potential for mitigation
- Loss of employment

- Impact on heritage assets
- Negative environmental impacts

2.26. The Green Belt Review provides further information on the reasoning for selecting Redhill Aerodrome including:

*“After an assessment of all the identified sites, the Redhill Aerodrome site was chosen as the preferred site for safeguarded land beyond the end of the plan period. The site is large enough to contain the required amount of housing, and has only limited risk of flooding in areas directly adjacent to the Salfords Stream. The site is not located within an area that suffers from air quality or noise management problems. The site is partially previously developed land, currently being used as an aerodrome, and its redevelopment for housing would be a sustainable use of previously developed land and would require the cleaning up of any contamination currently on the site. The ability to provide a large standalone settlement in this location due to the reduced risk of flooding makes the provision of local services easier, which may reduce the need to travel. When taking into account the level of housing needed beyond the plan period, the Redhill Aerodrome site should be considered a significantly more sustainable option than development on the remaining, flood-prone parcels of the Rural Surrounds of Horley”.* (paragraph 6.9)

*“In addition to this, the proposed site is not being safeguarded speculatively, but has been promoted through the SHLAA and HELAA processes. The site is thus available and developable, and while any decision on whether to actually develop it has still to be taken in a future review of the local plan, the site can realistically provide for some of the borough’s housing need in the future”* (paragraph 6.92)

2.27. The Council has therefore undertaken a robust assessment of the potential options available in respect of safeguarding land and have appraised a number of spatial options and possible site locations. This is therefore considered to be a robust assessment which has adequately considered the available evidence leading to the identification of the most appropriate strategy.

**4. Is the safeguarding of the Redhill Aerodrome site at this time justified by the evidence in light of the uncertainties with regard to the Garden Village proposed by Tandridge DC and other site and planning related constraints?**

2.28. The uncertainties are precisely a reason to safeguard a future opportunity for a Garden Village.

2.29. As outlined above the safeguarding of Redhill Aerodrome is a proactive and positive policy within the DMP which aims to safeguard potential future development land in order to meet the needs of the Borough post 2027. It is well documented from the Core Strategy and its Inspector’s Report that the current housing target is not meeting the OAN and as set out by revised national policy the standard methodology figure for housing need is also higher than the current target. RBBC has identified that they do not have adequate land outside of the Green Belt or within urban areas to be able to meet the current housing target, let alone the future higher housing requirement.

2.30. The safeguarding policy will not result in the immediate development of the Site and is specific in the policy

wording on the timing and circumstances under which the site will be brought forward for redevelopment. This includes within the supporting text at paragraph 4.10.22 specific reference to TDC and their support for the development of the site. This paragraph already stands the test of time, and hence can be interpreted based on the progress of the TDC Local Plan.

- 2.31. The TDC Local Plan remains at an early stage, with the Regulation 19 consultation being completed at the end of September 2018. TDC has acknowledged via an open letter from Councillor Jecks that they received a large number of responses (over 1,000) and that a number of parties have raised concerns in respect of the Local Plan including its evidence base, infrastructure, housing targets and site identification. The deliverability of South Godstone as a garden village location and its ability to deliver infrastructure were also raised as concerns. TDC has also acknowledged these issues in their recent Planning Policy Committee held on 20<sup>th</sup> September 2018.
- 2.32. The TDC Regulation 19 consultation provided very little evidence in respect of the Duty to Cooperate and the discussion held between RBBC and TDC. In addition, at the Planning Policy Committee, detailed above, Officers highlighted that additional evidence was still being produced to support the emerging Local Plan.
- 2.33. In light of this, the TDC emerging Local Plan cannot be given more than very limited weight and could reasonably be subject to significant modification in the future. The wording of the DMP allocation acknowledges that the site would be required for future rather than immediate development and will need to meet a number of criteria and be supported by evidence to come forward as part of the next plan period. This includes specific reference to TDC and their support. Therefore, the uncertainty with respect to TDC and their spatial strategy should not prevent the land at Redhill Aerodrome from being safeguarded.
- 2.34. The NPPF advocates a positive approach to plan making and the need for local planning authorities to plan for issues with cross boundary impacts. The safeguarding of Redhill Aerodrome provides a mechanism for RBBC and TDC to jointly take forward the development at this Site in a timely manner via an Area Action Plan should the strategy of TDC be modified through their own Local Plan preparation.

### **5. Should the site remain as Green Belt and be considered further in a future review of the local plan?**

- 2.35. The site will effectively remain Green Belt on the basis of the safeguards within the policy wording (notably criterion 2 and 6), thus it is effective. As set out RBBC has provided a range of evidence justifying the safeguarding of the Land at Redhill Aerodrome which would be considered as part of the Local Plan Review.

### 3. Conclusion

- 3.1. As set out in the comments made above in respect of the Inspector's Main Issues and Questions Thakeham, and its development partner Quintain, support the safeguarding of Land at Redhill Aerodrome.
- 3.2. The DMP in this regard is consistent with national policy and the adopted Core Strategy and RBBC have produced evidence including the Sustainability Appraisal (updated May 2018), Green Belt Review (October 2017) and Safeguarded Land (December 2017) document which justifies the safeguarding of the land.
- 3.3. In respect of the emerging TDC Local Plan this is at an early stage and can realistically be subject to significant modifications before its submission for examination. The safeguarding of Redhill Aerodrome in the DMP is clear in its commitment to working with TDC and the safeguarding of the land will allow for TDC and RBBC to bring forward development on the site jointly and in a timely manner via an AAP.

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