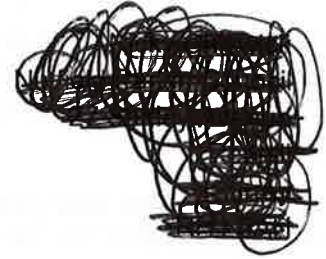


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8 October 2018

Dear Sirs,

**Re: Nutfield Parish Council - RBBC DMP ADDITIONAL SUBMISSION - Matter 11
Safeguarded Land (Policy MLS2)**

Regarding the forthcoming RBBC DMP hearing I believe that the Inspector should consider the following contradiction between the Tandridge District Council (TDC) Regulation 19 draft Local Plan and the DMP of Reigate & Banstead Borough Council (RBBC).

RBBC wish to Safeguard the parcel of land designated as SAS1 for future housing development. SAS1 includes a section of the existing and fully operational Redhill Aerodrome (RA) which straddles the border between RBBC and TDC with approximately 65% within Tandridge DC's boundary. In its Regulation 19 Local Plan, expected to be submitted for examination before January 2019, TDC has designated the employment element at RA as an Important Employment Site (IES).

The Parish Council would like to draw attention to the following issues that arise as a consequence of this contradiction.

Safeguarded Land

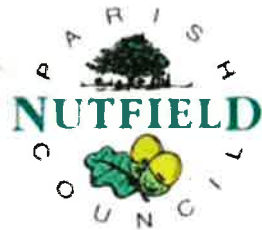
The National Planning Policy Framework (NPPF) sets out that when amending Green Belt boundaries regard should be given to their intended permanence. This will enable them to endure well beyond the plan period. In doing so, sites can be Safeguarded for future development in order to meet longer-term needs.

The NPPF (paragraph 85, bullet point 3) is explicit that Safeguarded land should be on the edge of the urban area. This is consistent with the fundamental aim of Green Belt policy, which is to prevent urban sprawl.

Safeguarded land should be located where future development would be an efficient use of land, well integrated with existing development, and well related to public transport and other existing and planned infrastructure, so promoting sustainable development.

But to be consistent with the NPPF, any Safeguarded land would need to be on the edge of an existing RBBC urban area.

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We understand that, once adopted, a local plan must be reviewed every five years. Such reviews provide local authorities with numerous opportunities to revise existing site designation boundaries, propose safeguarded land for development and allocate further land for future expansion.

But this five-year local plan review process also effectively removes a local authority's need to Safeguard land in the first place.

We surmise that when a site is Safeguarded, development is practically guaranteed to occur at the site at some point in future. On that basis premature Safeguarding offers little benefit to RBBC, as once land has been removed from the green belt, it is effectively lost for ever. This is particularly sensitive if the proposed Safeguarding creates a negative impact for a neighbouring Authority.

The development of local plans are supposed to be supported by a robust evidence base.

Where is the evidence to support the Safeguarding of Redhill Aerodrome as part of SAS1?

Existing Employment

Local plans are not just about the provision of housing.

It is a fact that even prior to its potential formal recognition as an IES by TDC the Redhill Aerodrome site was considered by its owners as an important site of local employment within neighbouring TDC area.

In evidence given at the 2014 Public Inquiry the Aerodrome's owners (RAL) claimed it was the biggest employment site within the TDC area, this claim was not disputed by RBBC.

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

Evidence accepted at the 2014 Redhill Aerodrome Public Inquiry stated:

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

It is an undeniable fact that Safeguarding RA would ultimately result in the loss of 450 jobs, direct and indirect due to the uncertainty created. The job numbers used were presented by Redhill Aerodrome consultants York Aviation at the 2014 Public Inquiry. They were accepted by the Planning Inspector.

The loss of the existing jobs would likely commence as soon as the site as designated to be Safeguarded. It is reasonable to surmise that the existing companies would likely evoke their lease break options and look for alternative premises to secure the future of their businesses.

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

There is likely to be a significant lead time between the cessation of the existing employment activity at Redhill Aerodrome. By TDC's own analysis this is likely to be a minimum period of 15 years. If there were only a 10 year gap between the closure of the existing employment and the provision of new employment then this could result in an overall GVA deficit of some £185m. This must be a material consideration.

The probable result is that this important employment site (so rated by TDC itself) becoming a dwindling asset with its financial contribution to the local economy ceasing.

The uncertainty, created by the RBBC proposed action to Safeguard Redhill Aerodrome, is likely to result in the existing companies moving elsewhere, very likely outside of the immediate area, especially if they are aviation based.

Much of the existing employment at Redhill Aerodrome is aviation related, highly skilled and would not be replicated by new positions created by any housing development which would not commence for many years.

A significant percentage of the existing workforce employed at Redhill Aerodrome fall into the STEM (science, technology, engineering and mathematics) category.

The Government already recognise the UK must meet the growing demand for people equipped with higher level, economically valuable skills. In particular, ensuring that businesses have access to science, technology, engineering and mathematics (STEM) skills is vitally important as these skills play a central role in developing innovative products and services.

The UK's economic future lies in high value, innovative and knowledge-intensive activities, especially post Brexit. To pursue this course a highly skilled STEM workforce is essential. However, the shortage of STEM skills in the UK should be treated as a national crisis, according to experts in the field.

Redhill Aerodrome Site

The Aerodrome currently fulfils an important dual function of contributing to the nation's General Aviation infrastructure as well.

The action by RBBC of Safeguarding and subsequently developing RA will eradicate the fixed wing flying activity at the Aerodrome which will result in the closure of an IES designated by a neighbouring LPA (TDC).

Further RA is offered increasing protection by the recently redrafted NPPF under its aviation designation. This is not been recognised by RBBC.

The Contradiction

TDC have designated RA as an IES in their Regulation 19 Draft Local Plan. I believe this is the first time that RA has been considered as qualifying for any specific Employment Status.

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Within the DMP now offered for examination RBBC wish to Safeguard Redhill Aerodrome for future residential development as part of land parcel SAS1.

This appears to be a contradiction as the site cannot be used for both purposes.

Where does the "Duty to Cooperate" feature in a case such as this as the same parcel of land is being classified by neighbouring LPA's in a totally contradictory manner?

To consider developing a neighbouring LPA's Important Employment Site would seem totally counterproductive and not in the best interests of local employment prospects. Developing Local Plans are not just about housing provision.

Nutfield Parish Council ask you to take into account the consequences of this contradiction when examining this matter.

Yours faithfully

Councillor Paul Murray – Vice Chairman

Nutfield Parish Council