

Appeal Decisions

Inquiry opened on 7 January 2014

Site visit made on 15 January 2014

by Diane Lewis BA(Hons) MCD MA LLM MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 18 February 2014

LAND AT REDHILL AERODROME, REDHILL RH1 5YP

Appeal Ref: APP/M3645/A/13/2202134

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Redhill Aerodrome Ltd against the decision of Tandridge District Council.
 - The application Ref TA/2012/1027, dated 30 July 2012, was refused by notice dated 31 May 2013.
 - The development proposed is construction of hard runway to replace existing grass runways and ancillary infrastructure comprising realignment of existing taxiways, drainage improvements, replacement runway lighting and new approach lighting.
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Appeal Ref: APP/L3625/A/13/2202137

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Redhill Aerodrome Ltd against the decision of Reigate & Banstead Borough Council.
 - The application Ref P/12/01377/F, dated 30 July 2012, was refused by notice dated 10 June 2013.
 - The development proposed is construction of hard runway to replace existing grass runways and ancillary infrastructure comprising realignment of existing taxiways, drainage improvements, replacement runway lighting and new approach lighting.
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DECISIONS

Appeal Ref: APP/M3645/A/13/2202134

1. The appeal is dismissed.

Appeal Ref: APP/L3625/A/13/2202137

2. The appeal is dismissed.

REASONS

The Inquiry

3. The inquiry sat for 5 days, on 7 to 10 January and on 16 January 2014. The accompanied site visit took place on 15 January.
4. Salfords and Sidlow Parish Council, Nutfield Parish Council and Keep Redhill Airfield Green (KRAG) had Rule 6 status. In addition to all the main parties, a

number of people gave their own evidence, most of who objected to the proposal.

Appeal Site

5. Redhill Aerodrome is located in the Metropolitan Green Belt, to the south east of Redhill, in a low lying area of the countryside between the main routes of the A23 and the M23. The Aerodrome was established in the 1930's and has been active since that time. There are three grass runways, two of which run from east to west. The main group of hangars, airfield buildings and the Bristow's office building are near the main access off King's Mill Lane. The premises are occupied by a range of aviation related, industrial and storage businesses, employing around 330 people. The land is bounded by rural roads and by Salfords Stream to the south. Some two thirds of the land is within Tandridge District and the western third is within the Borough of Reigate and Banstead.
6. Redhill is a fully licensed Civil Aviation Authority (CAA) Aerodrome. It currently provides general aviation services for both fixed wing and rotary wing aircraft, including the Surrey Air Ambulance and the National Police Air Service. The Aerodrome holds a CAA Ordinary Licence, which permits flights for the public transport of passengers or for flying instruction. The main types of aircraft activity include Aero Club/training, private flying, charter and business flights and emergency response.
7. In October 2013 the Aerodrome was designated as a statutory undertaker under s57A of the Airports Act 1986 and therefore benefits from permitted development rights under Part 18 of Schedule 2 to Article 3 of the Town and Country Planning (General Permitted Development) Order 1995 as amended.
8. The planning history includes proposals to vary the scope of aviation activity at Redhill and its capabilities as an airfield. The current proposal has evolved from a previous proposal for a hard runway that was refused planning permission in 2011. In 1986 a proposal for a hard runway was dismissed on appeal and in 1995 a proposed commercial airport at Redhill was unsuccessful on appeal.

Background

9. The proposal was subject to an environmental impact assessment (EIA) and the findings were published an Environmental Statement (ES) and a Non-Technical Summary (NTS) dated July 2012. In arriving at my conclusions and decisions I have taken full account of the ES, the ES Addendum and all the other environmental information, including comments and representations made by statutory consultees and members of the public and the evidence given at the Inquiry.
10. During the late 1980s annual aircraft movements were in the order of 140,000, similar to pre-war levels. These historic levels subsequently declined. The EIA used 2010 as the baseline assessment year when there were 41,065 movements.
11. The development plan covering the two local authority areas includes the Reigate and Banstead Borough Local Plan 2005 (the Local Plan), the Tandridge District Core Strategy (the Core Strategy) and the saved policies of the Tandridge District Local Plan 2001. The emerging Reigate and Banstead Borough Council (RBBC) Core Strategy was subject to an examination in public

in May 2013. Tandridge District Council (TDC) submitted its Local Plan Part 2: Detailed Policies to the Secretary of State in September 2013. The two documents do not include any policies relating to the control of development at Redhill Aerodrome.

12. Leading up to the Inquiry, TDC amalgamated its objections into a single reason for refusal based on harm to the Green Belt. The development plan policies RE2 (green belt) and CSP 16 (aviation development) were considered not to be in full accordance with the National Planning Policy Framework (the Framework). TDC confirmed its case relied on the Framework alone. RBBC confirmed that its case was supported by the Framework and the Borough's Local Plan Policies Co 1 (protection of the Green Belt) and Em 12 (Redhill Aerodrome). RBBC accepted that little weight could be attributed to Policy Em 12 because of its inconsistency with the Framework. The local authorities confirmed that the effect of noise and disturbance on the amenities of local residents was not a ground to refuse permission. The case presented on harm from noise was confined to the effect on landscape character.
13. On completion of a unilateral undertaking (dated 3 January 2014) Surrey County Council as highway authority was satisfied that the package of measures and planning conditions would secure effective mitigation. TDC and RBBC withdrew the reasons for refusal based on highway safety and sustainable travel grounds and presented no evidence at the Inquiry on such matters. Subsequently the original undertaking was replaced by a revised unilateral undertaking dated 23 January 2014 that amended matters of detail.
14. The unilateral undertaking includes obligations to limit total annual aircraft movements to a maximum of 85,000. Within that total, rotary wing movements should not exceed 25,000 and business aviation movements should not exceed 20,000. Permitted hours of operation would be between 0700 and 2200 hours, subject to permitted extensions. These provisions allow for (i) a maximum of 5 fixed wing and 5 rotary wing aircraft movements per week during the hours of 0500 to 0700 and 2200 to 0000, (ii) a maximum of 10 rotary wing aircraft movements per annum during the hours of 0001 to 0459, and (iii) use of the Aerodrome at any time by emergency services or in any emergency declared by the captain of an aircraft. The undertaking also includes obligations in relation to noise, highway improvements and habitat management.
15. I am satisfied that the unilateral undertaking is able to be taken into account because the obligations are necessary, directly related to the development and are fairly and reasonably related in scale and kind to the development. Therefore they meet the all the tests set out in the Framework.

Main Issues

16. The main issues, derived from planning policy to protect the Green Belt, are:
 - Whether the proposal constitutes inappropriate development, taking account of the effect of the proposed engineering operations on the openness of the Green Belt and the purposes of including land within the Green Belt, and
 - If so, whether the potential harm to the Green Belt by reason of the inappropriateness, and any other harm, is clearly outweighed by other

considerations in order that the very special circumstances, necessary to justify the proposal, exist.

17. The main possible sources of other harm that require to be considered are:

- The effect of the proposed hard runway and realigned taxiways, drainage improvements, runway and approach lighting on the appearance and landscape character of the Aerodrome and surrounding area.
- The effect of the proposal on the quality of life for local communities in the surrounding area and on the learning environment at Salfords Primary School, taking particular account of noise and disturbance.
- The effect of the proposal on highway capacity and safety.
- The effect of the location of the Aerodrome on the mode of travel to the proposed transport facility.
- The effect of the proposal on airspace safety.

18. The other considerations that may weigh in favour of the proposal concern its effect on:

- the continuing existence, role and growth of the Aerodrome and the employment based there;
- employment and the economy in the wider area;
- the use of existing infrastructure at the Aerodrome;
- the local environment having regard to ecological enhancements, the management of flooding and control on operations at the Aerodrome to improve amenity.

19. Submissions were made as to whether the Green Belt balancing exercise should follow the approach set out in the *River Club*¹ judgement. Even though the judgement was made on the policy set out in Planning Policy Guidance 2, the wording in the Framework is very similar and I intend to follow the interpretation in the judgement. Furthermore this approach is reflected in decisions by the Secretary of State since the publication of the Framework.

Reasons

The proposed hard runway

20. The purpose of the proposal is to replace the three grass runways, all defined as code 2 runways by the CAA, with one hard surfaced runway on a new east west alignment. The code 2b non-precision approach runway would be designed in accordance with CAA requirements. The hard paved area would have a total length of 1,349 metres (m) and be 25m wide. The proposed runway would rise from 61.1m AOD at the eastern end to 64.7m AOD at the western end, to give a constant longitudinal slope within the 2% CAA requirement. Some cut and fill would be necessary to raise the western part of the runway by a maximum of 1m and the eastern end by a maximum of 2m in order to create an appropriate horizontal alignment. The proposed general

¹ *The River Club v Secretary of State for Communities and Local Government & Royal Borough of Kensington upon Thames* [2009] EWHC 2674 (Admin) at paragraph 27.

arrangement would also include hard paved runway turnpads at each end, a grassed runway strip, grassed runway safety end areas and new lengths of hard surfaced taxiways 10.5m wide. Two areas of existing taxiways would be broken up and returned to grass.

21. As part of the proposal a new runway and approach lighting system would be provided. The approach lights, seven individual lights at 60m intervals along the runway centreline, would extend out to 420m from the threshold at either end of the runway. The first two lights at either end of the runway would be flush fitted into the runway surface. The remaining five centreline lights would be on poles, at a maximum height of 2m subject to ground conditions. Lighting would also define the hard runway edge, the ends of the runway, the turnpads and taxiway to the north. Crossbar lighting would be located at 300m from each of the runway thresholds at right angles to the centre, with the pole length suited to the contours of the land. The lighting system would be operational only when aircraft depart/land and the luminance levels would vary depending on light levels, weather conditions and time of day. The fact that new lighting could be installed under permitted development rights is of little relevance as a fallback because the proposed lighting is associated with the provision of a new runway for which permission is required.
22. Ancillary drainage works would be necessary to provide surface water and flood water attenuation. These works would consist of the installation of a runway edge drainage system, the provision of flood water compensation areas in the form of shallow basins and the replacement of the Redhill Brook underground culvert with an open channel on a new alignment.
23. A habitat management area is proposed to the north of King's Mill Lane, away from the operational area of the Aerodrome. No detailed proposals have been submitted. The intention is to retain the agricultural use but to enhance biodiversity by introducing agricultural management practices to improve natural habitats, provide habitat for protected species, protect watercourses with river bank planting and fencing and to improve public access.

Green Belt

24. The Framework confirms the great importance attached to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
25. The Aerodrome covers an extensive area. Most of the buildings and hard surfaced areas are concentrated around the main access off King's Mill Lane. The remaining area is primarily open green space, interrupted by the perimeter taxiways, the air traffic control tower and terminal building and other small scale features.
26. The provision of a hard runway would be carried out as a single development and comprise a series of engineering operations. The associated earthworks, installation of lighting and drainage works would be integral to its provision. The hard paved area, by reason of the dimensions required, would be over a kilometre long and over twice the width of a taxiway. The runway would change the physical nature and character of land, replacing an existing grassed area. The hard runway would introduce a permanent engineered piece of infrastructure, which when in use would be illuminated by the new lighting

system. The open, undeveloped appearance would be eroded. For similar reasons the operational development would not assist in safeguarding the countryside from encroachment. The nearest surrounding development is not in the form of large built-up areas or historic towns. In view of the principal change to the land, the siting of the proposed development would be sufficiently distant from the towns of Redhill and Horley to have no effect on their separation.

27. Therefore the proposal would not preserve the openness of the Green Belt and would conflict with a purpose of including land within it. In accordance with the Framework, the proposal is inappropriate development and by definition would be harmful to the Green Belt. The engineering operations are not within a category of development permitted by Policy Co 1. Under Policy RE2 the inappropriate development may be justified if very special circumstances exist. However, the wording of this policy is not consistent with the Framework and it has limited weight.
28. Evaluating the degree of harm, this part of the Aerodrome is currently relatively undeveloped and open compared to the area of hangars and buildings near King's Mill Lane, which is well lit. As a result, the loss of openness would be emphasised by the area covered by the hard runway itself, and to a much lesser degree the lighting installations and poles. The projected increase in aircraft movements to 85,000 facilitated by the proposal would increase the frequency of use of the runway and hence the activity and light pollution. The probability is that there would be more aircraft parked in the open and more parked cars. For similar reasons the encroachment into the countryside would be evident.
29. However, the proposal would not involve any new buildings and the physical changes would be primarily to the land surface. Unlike the Appellant, I do not single out the limited earthworks as affecting openness. This engineering work, and the resulting minor change in the topography, is a means to providing a runway to the required standard. The undulating nature of the land would be maintained. The resultant hard runway is the feature that harms openness. The effect of the new taxiways (390m in length) would be balanced by the restoration to grass of some existing taxiways (370m). The lighting poles would be small in number and lighting exists for the grass runways. The purpose of the lighting is to indicate the outline position of the runway, not to illuminate it and the intention is that lights would be kept at the lowest intensity possible. On this basis the lighting scheme is the minimum necessary for working purposes in accordance with Policy EV9 of the Tandridge District Local Plan. The drainage works when complete would have a negligible effect on openness. The habitat management area probably would have a neutral or slight effect, subject to any fencing details. In the context of the Aerodrome, the loss of openness would be limited and the scale of encroachment contained.
30. In total, the harm to the Green Belt has substantial weight.

Landscape character and visual amenity

31. In the Framework a core planning principle is to take account of the different roles and character of different areas, protecting the Green Belts around the main urban areas, recognising the intrinsic character and beauty of the countryside. Development should respond to local character and history and

reinforce local distinctiveness. Similar objectives are reflected in the Tandridge District Core Strategy. Policy CSP 18 requires new development to have regard to landscape features and to the topography of the site and Policy CSP 21 requires development to conserve landscape character. The Aerodrome is not subject to any landscape designation.

32. The landscape within a 3 km radius of the Aerodrome (the identified zone of influence) has a gently undulating topography forming low raised areas and very shallow valleys. A number of small streams and brooks generally run east to west between two ridgelines. The field pattern is irregular with many tree lined boundaries. The localised blocks of woodland, some of which are designated as Ancient Woodland, and mature hedgerows combine to give a wooded character. Expansive views are possible but visibility is also limited by the topography and vegetation cover. The nearest settlements to the Aerodrome are South Nutfield to the north east and Whitebushes and Salfords to the west. Sporadic residential properties and farmsteads are found along the network of rural roads and lanes. Landscape sensitivity has been assessed as medium-high. The relative quiet of the rural surroundings is affected by noise disturbance in the form of the continuous background traffic noise from the M23, aircraft activity at the Aerodrome and Gatwick overflights. Tranquillity is not an identified key landscape characteristic.
33. The Aerodrome has a different character to the more typical Wealden landscape around it. A distinctive feature is the open areas of grassland extending over a wide area. The group of hangars and office buildings and the features of the airfield, such as the control tower, taxiways and parked aircraft identify the open land as being part of an Aerodrome. The extensive open green space and the rural edge with wooded boundaries make a positive contribution to the rural landscape, even though the Aerodrome landscape is not of particularly good quality. The sensitivity of the site was assessed as medium in the ES.
34. The proposed hard runway would change the character of the Aerodrome in so far as a hard paved area would cut across the green space and extend beyond the existing perimeter taxiways. The new lighting system would be more intrusive than the existing, by reason of the proximity of some elements to the boundary near Crab Hill Lane and the probability that the runway would be used on a more regular basis during hours of darkness or times of poor visibility. The semi-rural character of the Aerodrome would be eroded and it would not blend so readily into its surroundings. The access on King's Mill Lane would undergo some improvement to increase visibility, which would be likely to slightly detract from the rural character of the Lane at that point. On the positive side and in compliance with Policy CSP 18, the undulating appearance of the land would be retained, no woodlands or trees would be lost and a new watercourse and habitat would be created through the replacement of the Redhill Brook culvert.
35. In the surrounding area physical changes would be limited to minor junction and rights of way improvements and habitat management. The gradual increase in aircraft movements and activity would result in additional noise disturbance that would detract from enjoyment of the landscape setting but the noise contours indicate the extent of disturbance would be contained. Overall the character of the wider landscape outside the Aerodrome would experience limited harmful change as a result of the proposal.

36. Drawing all these considerations together, the proposal would adversely affect the appearance and character of the Aerodrome within its landscape setting. Landscape character would not be conserved, contrary to Policy CSP 21. Referring to the Framework, local distinctiveness would not be reinforced. I attach moderate weight to the harm.
37. The ES identified a visual envelope of the grass runways, the main areas of visibility on the elevated ridgelines to the north and south and concluded that a zone of visual influence does not extend much beyond 3km. The zone of visual influence of the proposal lies within similar areas. A number of representative viewpoints were selected from varying distances, orientations and potential receptors to show typical or sensitive views. This selection was not disputed by the Councils, the Rule 6 or other interested parties, although Mr Hall (for TDC) identified two additional viewpoints on Crab Hill Lane.
38. The effect of any permanent change on views post construction is the most relevant. The sensitivity of receptors will vary, with greater sensitivity associated with residents and walkers, cyclists and horse riders compared to the low sensitivity of motorists experiencing transitory views. In this respect, the location of residential properties relative to the Aerodrome and the network of public rights of way have been taken into account. The Greensand Way, a national long distance recreational route, runs to the north of the Aerodrome from Earlswood Common to King's Mill Lane and then to Bletchingley. The winding character and lack of footways along the surrounding rural roads would not encourage use by non-motorists.
39. The extent of the visual impact is limited by the natural screening provided by trees, hedgerows and the topography. As a result the hard runway is unlikely to be visible even from some viewpoints close to the Aerodrome such as from the footpath at Oak Stump (viewpoint 2) and from near the bridge over the M23 (viewpoint 5). There would be more open views of the new runway from Masons Bridge Road (Viewpoint 3) but the most of the receptors probably would be motorists, resulting in only a slight adverse visual effect. To the east, from Crab Hill Lane, residents of the Nurseries would be likely to experience a significant adverse effect but for motorists the effect would be slight. In longer distance views the Aerodrome is seen as part of a wider panorama. The adverse effect of the proposal would be slight or negligible from viewpoints 7, 9 and 10. Somewhat closer, viewpoint 8 on the Greensand Way provides an elevated view across the Aerodrome. Even allowing for the high sensitivity of receptors, the magnitude of the visual change would be small, as indicated by the assessment in the ES. My conclusion has taken account of the location of viewpoint 8 within an Area of Great Landscape Value and the proposal under consideration to extend the Surrey Hills Area of Outstanding Natural Beauty.
40. I conclude that the proposal would result in a slight adverse visual impact, to which I attach a small amount of weight.

Noise and disturbance

41. No policies relevant to noise in the development plans of TDC and RBBC have been drawn to my attention. The Framework states that planning decisions should aim to (a) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development; and (b) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions.

The stated aims refer to the Noise Policy Statement for England, which describes the Significant Observed Adverse Effect Level (SOAEL) as the level above which significant adverse effects on health and quality of life occur. There is no numerical limit to identify this, and related, threshold levels. Emerging guidance indicates a noise exposure hierarchy based on perception, examples of outcomes, increasing effect levels and actions. In the expert evidence Mr Charles (for the Appellant) suggested that the 57 dB $L_{Aeq\ 16h}$ is quieter than the SOAEL but greater than the LOAEL, the Lowest Observed Adverse Effect Level. Mr Cole (for the Parish Council Rule 6 Parties) suggested that the SOAEL level was 64 dB $L_{Aeq\ 16h}$.

42. The Aviation Policy Framework 2013 (the APF) states that the Government's overall objective on noise is to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. The APF continues to treat the 57 dB $L_{Aeq\ 16h}$ contour as the average level of daytime aircraft noise marking the approximate onset of significant community annoyance. It recognises that not all people within this contour will experience significant adverse effects from aircraft noise or that no-one outside of the contour will consider themselves annoyed by aircraft noise. The APF also recognises that aviation noise is not confined to large commercial airports and that annoyance can also be caused by smaller aerodromes used for business and general aviation purposes, especially at times of intensive activity.
43. Noise is a primary concern to communities in the locality of the Aerodrome. This is reflected in the representations on the proposal, including those by Mole Valley District Council and the Parish Councils for Nutfield, Salfords and Sidlow, Bletchingley, Buckland and Horne. Having considered all the noise evidence, the following matters are the most relevant to my assessment.
44. The noise surveys conducted to inform the ES indicated that the noise impact from the current Redhill operations is small. The noise contours for fixed wing operations show that no residential properties are exposed to 54 or 57 dB $L_{Aeq\ 16h}$ or above. The position is slightly different for rotary wing operations, with 6 residential properties exposed to 54 dB $L_{Aeq\ 16h}$ and above and 20 properties exposed to the sensitivity contour 51 dB $L_{Aeq\ 16h}$. Complaints were said to primarily concern overflying of properties due to perceived off-track operations.
45. The proposed runway has been aligned with the Salfords Gap, with the aim of minimising noise disturbance. Noise contours were produced for 2030 with the new development in place. The unilateral undertaking includes an obligation to ensure that the areas of the noise contours for fixed wing and rotary aircraft should not be exceeded and for an approved noise management plan to be implemented and maintained. Therefore it is reasonable to base conclusions on those noise contours and related evidence.
46. In respect of fixed wing aircraft, the expectation is for an increase in the level of general aviation activity over the period to 2030, all circuit flying to occur on one circuit and repetitive direct overflying of the Copsleigh Avenue area to cease. The 57 dB $L_{Aeq\ 16h}$ contour would be considerably elongated, extending further to the east to Henhaw Farm and into the Salfords Gap to the west. Four isolated residential properties would be exposed to noise levels of 57 to 60 dB $L_{Aeq\ 16h}$. The number of residential properties within the sensitivity 54 to 57 dB $L_{Aeq\ 16h}$ band would increase from 0 to 125, a factor that deserves to be borne in mind. The Salfords Schools would not be within this noise band.

47. The development would result in changes to rotary wing operating arrangements and it is envisaged activity would be distributed more uniformly across the year. The effect on the extent of the noise contours and numbers of affected properties would be small. I note, however, that 2 additional properties would fall within the 57 to 60 dB $L_{Aeq\ 16h}$ band and thus be exposed to more noise.
48. Nutfield Parish Council and Salfords and Sidlow Parish Council disputed that the 57 dB $L_{Aeq\ 16h}$ contour marked the approximate onset of significant community annoyance in relation to the proposed development and put the case that a 5dB penalty should be applied. Attention was drawn to the acknowledgement by the APF that there is no firm consensus on the way to measure noise impacts of aviation and that the policy will be kept under review. Reliance was also placed on the findings of a 1998 Department of Transport "GABA" study and consistency urged with an assessment at Goodwood Aerodrome.
49. The APF, recently published in March 2013, is current policy. It does not indicate that noise from smaller aerodromes might give rise to a greater level of annoyance than noise of the same magnitude from commercial operations or that a 5dB penalty should be applied to account for the possibility in noise assessments. Furthermore, the Appellant demonstrated the GABA study concluded that leisure flying was associated with higher levels of annoyance, whereas there was agreement between the expert witnesses that the predominant noise source from Redhill would be business aviation. The Goodwood Aerodrome noise assessment had a different purpose and a 5dB penalty was to ensure a conservative approach. The circumstances were not comparable and I attach no weight to that study in informing the approach to be adopted at Redhill. My conclusion is that the 57 dB $L_{Aeq\ 16h}$ contour was correctly applied to indicate the onset of significant community annoyance in respect of fixed wing aircraft movements. In any event, sensitivity noise contours were produced to indicate the numbers of properties likely to experience some adverse change in the noise environment.
50. Using this average noise exposure contour, the results described above indicate that a very small number of households would be likely to experience an increase in noise sufficient to result in potential significant annoyance. The Appellant submitted that the actual number of people significantly annoyed could be as low as one person.
51. A larger number of households would be likely to experience an increase in average noise levels sufficient to be noticeable and possibly intrusive. Particular attention was drawn to an estimated 8.8 dB increase in summer for houses on Honeycrock Lane. However, the homes would not be exposed to the 57 dB sensitivity noise contour. The noise environment would not suddenly change on completion of the development and a probable gradual change over the period to 2030 would reduce the impact of the adverse effect. Against this has to be balanced the probability of more flying activity in the winter and the potential for disturbance throughout the year for those affected.
52. On this matter, the relief provided by a reduction in activity in winter months was found to be relevant by the Inspector in 1995. In relation to these appeals concerns have been expressed that the valued respite from flying activity during the winter would be lost. This is not an outcome that is easily

- quantified. Whilst the average noise levels would be no greater than in the summer, in all probability a noticeable loss of amenity would be experienced.
53. The proposed controls on aircraft movements would provide for a limited number of aircraft movements outside of the permitted hours of 0700 and 2200. The numbers would be small and the noise experts agreed that maximum noise levels would not be likely to be above sleep disturbance thresholds.
54. In addition to residential properties, a relevant consideration is the effect on the learning environment at Salfords Primary School on Copsleigh Avenue. Referring to the ES analysis, in the baseline year of 2010 the School is outside and below the 51 dB $L_{Aeq\ 16h}$ band. The 2030 daytime summer fixed wing noise contours shows that the School would fall within the 51 to 54 dB $L_{Aeq\ 16h}$ band, but not within the sensitivity contour for fixed wing movements. This result was not challenged but questions were raised over the adequacy of the indicator to represent the noise environment. Mr Twaites (a school governor) gave evidence on the current situation for the 400 or more pupils. He referred to the poor sound insulation to the majority of the buildings. Outdoor teaching areas complement the classroom accommodation. From his experience teachers have to stop speaking when fixed wing aircraft and helicopters fly near the School. Children's concentration is disturbed during written tests. He believed that an increase in noise as a result of the development, including the ability to operate flights all year round, would affect pupils' stress levels, health and powers of concentration.
55. The APF expects airport operators to offer acoustic insulation to noise sensitive buildings such as schools exposed to levels of noise of 63 dB $L_{Aeq\ 16h}$. At Salfords Primary School the future forecast noise exposure for the worst exposed façade is 53 dB $L_{Aeq\ 16h}$, well below the identified level. However, I do not regard this as a conclusive yardstick to assess the effect of the proposal because noise insulation and compensation is one of a range of measures set out in the APF to reduce and mitigate noise. In this case, reference was also made to Building Bulletin 93 (BB93), which provides guidance on design standards for new school buildings, extensions or refurbishment. Whilst not strictly applicable to the circumstances, the criteria in BB93 provide a useful indicator. The internal levels in the worst case were assessed as 1 dB above the level suggested by the guidance for a renovated school building, a margin that is generally considered to be not perceptible.
56. The APF recognises that people do not experience noise in an average manner and that the value of the LAeq indicator does not necessarily reflect all aspects of the perception of aircraft noise. The use of alternative measures, such as frequency and pattern of movements, is encouraged. It also acknowledges that there are large uncertainties around the precise change in relationship between annoyance and the exposure to aircraft noise. My conclusions take this policy guidance into account.
57. The quantitative evidence supports a general conclusion that an aim of the Framework, to avoid noise from giving rise to significant adverse impacts on health and quality of life, would be satisfied. Notably, the Councils did not refuse permission on grounds of an adverse noise impact on the amenities of local residents – their concerns were solely in relation to the effect of noise on landscape character. However, the noise environment would change and for

some residents, albeit a small number of individuals, the change would impact on their living conditions and reduce their quality of life. The adverse change would not be unacceptable but should not be ignored. The change in the pattern of air movements over the year would bring an adverse and immediate change that would be likely to be perceived in the surrounding area. Salfords Primary School is in a vulnerable location near the flight path and is noise sensitive. Mr Twaites was able to speak from first hand knowledge and experience. Even allowing for the realignment of the new runway, the proposal would be likely to result in some deterioration in learning conditions and adaptation of teaching practices.

58. The Appellant raised the fallback position, arguing that the activity at the Aerodrome is lawful and a return to significantly greater historic levels could occur without reference to the planning authorities. I agree that the harm from the high historic levels (a total of over 92,200 in 1997) with no planning controls on noise, would be greater than with the proposal. However the stated purpose of the proposal is to reverse decline and enable a growth in activity. There is no evidence to indicate that a return to historic levels would be a realistic prospect with the existing grass runways. The fallback has no weight.
59. In conclusion, the position is not one where planning permission should be refused on grounds of noise alone. Nevertheless, the proposal would erode the quality of life and detract from the learning environment by reason of noise disturbance. Policy objectives would not be fully met. I attach some weight to the effects of noise and disturbance on the local communities.

Highway network and sustainable transport

60. The Framework promotes the use of sustainable travel modes, achievement of safe and suitable access for all and improvements to effectively limit significant impacts of a development. Policies in the development plan are generally consistent with those objectives. The APF requires all proposals for airport development to identify clear surface access proposals with the objectives of ensuring easy and reliable access by passengers, increased use of public transport and minimising congestion and other local impacts.
61. The highway network surrounding the Aerodrome consists of rural classified un-numbered roads that provide links to the principal roads, the A23 and A25. The roads are rural in character and variable in width with restricted visibility in places. King's Mill Lane in particular is winding and evidence was given about the accidents and incidents that have occurred on this highway. Availability of bus services in the vicinity is very limited. The nearest stations are Salfords, Nutfield and Earlswood, although Redhill is the key station in the local network. The rural roads have no paved footways alongside, although they provide links to public rights of way that are generally most suited to recreational purposes.
62. Strong objections on highway grounds were made by the Rule 6 parties and by interested third parties and residents.

Highway capacity

63. A traffic survey in 2010 of existing Aerodrome traffic recorded some 115 movements in the AM peak hour and 102 movements in the PM peak hour, nearly all cars. The development (the hard runway and additional commercial

development) is predicted to generate in 2030 an additional 192 movements at the Aerodrome access in the AM peak hour and an additional 189 vehicles in the PM peak hour. No evidence was produced to challenge these results and having considered the underlying assumptions I agree with the highway authority that the figures are a robust worst case scenario. The movements would represent a 5 to 6% increase on the baseline traffic flows on King's Mill Lane. In the Transport Assessment Addendum the main routes and proportions of traffic associated with the Aerodrome are considered to be: east towards Godstone 29%, with traffic coming through the Mid Street/A25 junction; west towards Earlswood 23.5%, with traffic coming through the A23/Three Arch Road junction; south towards Horley 21% and 26% north towards Redhill. This distribution has not been disputed.

64. Attention focused on junction capacity in the analysis of the capacity of the highways to accommodate traffic generated by the proposal. The Aerodrome access with King's Mill Lane would function well in the base year (2014) and would continue to do so with virtually no queuing following the development. The A23 Horley Road/ Three Arch Road/ Maple Road junction currently operates at capacity with a cycle time in excess of 150 seconds and queuing at its worst on the A23 northbound in the AM peak. The application of the growth factors sees the junction operating with increased degrees of saturation and queue lengths. The development would exacerbate the situation especially in the morning peak, although the increase in the degree of saturation would be low compared to the background growth on the road network.
65. The A25/Mid Street junction is shown to operate over-capacity in the 2014 AM peak on the Mid Street to A25 stream. By 2024, without the expansion of the Aerodrome, the junction would operate over capacity with associated increase in delays. The fewer gaps in the traffic on the A25 would provide less opportunity for the minor arm traffic, particularly for vehicles turning right. I agree with the highway authority's conclusion that the situation would be made significantly worse by the addition of traffic associated with the development, as opposed to the low impact referred to in the Transport Assessment.
66. The mitigation proposed includes the payment of a highway capacity improvements contribution secured through the unilateral undertaking. The contribution would be a proportion of the cost of improvements at both the Three Arches and the Mid Street junctions. This approach is reasonable because it would be disproportionate to require the development to fund the total cost of capacity improvements. The terms of the obligation allows for the payment to be made by 30 November 2019 at the latest. There is no certainty over the funding or timescale for the junction improvements to be carried out. Therefore there is a probability that the traffic generated by the development would exacerbate the capacity problems at the junction for some unknown length of time.
67. Salfords and Sidlow Parish Council drew attention to a recent refusal by Surrey County Council for the construction of a waste reception building that included a reason based on cumulative transportation impact (the Britannia Crest application). In my view the circumstances were not comparable and the decision has little relevance to these appeals.

Highway safety

68. A review of the accident record for King's Mill Lane over the period January 2007 to September 2012 showed that a significant number of the 18 accidents occurred at four bends on the stretch of road between Masons Bridge Road and the Aerodrome access. The most reported contributory factors were identified as being 'loss of control', 'slippery road' and 'travelling too fast for the conditions'. The highway authority also identified a cluster of accidents at the junction of Picketts Lane, Axes Lane, Honeycrock Lane and Masons Bridge Road, which was considered to be on the route for vehicles travelling to or from the south. Residents gave personal accounts of the many incidents and accidents on King's Mill Lane, despite the attempts to improve signage.
69. The development would generate more vehicle movements on the local road network that in turn would increase the risk of accidents and reduce highway safety. The proposed mitigation, primarily secured through a planning condition, would be directed at improving driver awareness, reducing vehicle speed and assisting in managing potential skids. On King's Mill Lane the safety measures would include provision of warning signs, high friction/anti skid surfacing at the bends and the enhanced use of cat's eyes/road studs. Anti skid surfacing and better signage would also be secured at the Picketts Lane, Honeycrock Lane junction. In my view the improvements should be installed prior to commencement of development to provide mitigation for construction traffic. Such measures would directly address the factors identified to contribute to accidents and safety would be improved. However, the inherent hazardous character of the road would remain.
70. The unilateral undertaking also makes provision for a financial contribution towards safety improvements at two locations on the sign posted route from the A25 to the Aerodrome – the King's Mill Lane/ Clay Lane/ Bower Hill Lane/Kings Cross Lane junction and the Bowers Hill Lane and Sandy Lane junction. The contribution would be paid before commencement of development and would be available to the highway authority to carry out safety improvements. However, by necessity the contribution would be limited to a proportion of total costs and additional funding would be required. There is no specified timescale for the works. Consequently the weight to be attached to these measures is limited.
71. The main Aerodrome access is near a bend. The proposal is to improve visibility in both directions by removing some planting and an Aerodrome sign and by re-grading a bank. These improvement works would be appropriately secured by a planning condition and result in an acceptable form of site access.

Travel Mode

72. The location of the site away from the main routes and the inadequacies of pedestrian, cyclist and public transport provision do not encourage the use of other modes of travel to the car. The proposal, through the unilateral undertaking, commits the Appellant to the preparation and operation of an approved Travel Plan with a view to influencing travel to and from the site. An element of the Travel Plan would be the provision of a fully funded executive shuttle bus to operate at peak hours on weekdays between Redhill Station, Redhill town centre, Nutfield and Salfords railway stations. In addition an off-peak on demand service would be available 0900 to 1600 hours on weekdays for the transport of passengers associated with the use of aircraft at the

Aerodrome. In addition planning conditions would require schemes to improve public footpath, bridleway and cycle facilities across land within the vicinity of King's Mill Lane and Crab Hill Lane.

73. The Framework regards a Travel Plan as a key tool to facilitate the use of sustainable transport modes. The inclusion of this measure as part of the package of proposals is positive and is in line with policy. The planning obligation outlines its broad aims and heads of terms and a draft travel plan framework was submitted with the Transport Assessment. The provision of a shuttle bus service is a main component of the plan and the objective is to give people a real choice in travelling to the Aerodrome. London Helicopter Centres considered the service would be a benefit to its staff and visitors but otherwise there is little supporting research or evidence to indicate the effect it would have on travel behaviour. No estimation has been made or target given for reducing the number of trips by private car or whether the service would reduce trips by taxis and chauffeur driven cars. The proposals for improving cycle, footpath and bridleway provision probably would have little effect on reducing car trips to the Aerodrome because of the rural character of the routes. Based on my observations and residents' local knowledge the benefit would more likely be to recreational and leisure use.

Conclusions

74. The transport infrastructure serving the Aerodrome has serious inadequacies, especially seen in the winding character of King's Mill Lane, the congestion already experienced at key junctions during the peak hour and the inconvenience and inability to use public transport. The Aerodrome is not well located to promote sustainable transport solutions, which places a constraint on the extent to which inherent problems may be satisfactorily addressed. The forecast growth of employment and expansion of air services would increase pressure on the infrastructure. Residents fear the development would make accessibility and travel in and around the area worse and less safe.
75. The package of mitigation measures secured as part of the proposal is fairly and reasonably related in scale and kind to the development, consistent with Policies CSP 11 and CSP 12 of the Core Strategy. As a result improvements would be put in place to accommodate traffic safely and to ensure accident potential would not be aggravated, in accordance with Policies Mo 4 and Mo 5 of the Local Plan. However, on the evidence, the ability and success of reducing the use of the car is uncertain but is more likely to be low. Key junction improvements to increase capacity are uncertain in delivery and timescale. Aims of Policies Mo 5 and Mo 7, to ensure traffic congestion is not aggravated and to promote sustainable travel solutions, would not be fully secured. The proposal is in conflict with the development plan on certain transport issues.
76. The submission of a Transport Assessment confirms that the development is of a type that would be expected to generate a significant amount of movements. The development would not be located where there is the ability to minimise the need to travel and maximise the use of sustainable travel modes, even allowing for the solutions to vary between rural and urban areas. The site is not a sustainable location supported by the Framework. However, the residual cumulative impacts of the development would not be severe. The Framework does not advocate preventing the development in such circumstances.

77. There is no clear overall policy direction. The failure to satisfactorily resolve the capacity and mode of travel issues and the difficult local conditions along King's Mill Lane lead me to conclude that the associated harm provides some weight against the proposal.

Airspace safety

78. KRAG's case is that air traffic control issues, which are distinguished from safeguarding issues, have not been resolved. KRAG did not identify any harm to public safety or any planning policy or advice in relation to the matter. Reference was made to correspondence with National Air Traffic Services (NATS) that in turn referred to the development of the London Airspace Management Programme.

79. In considering this matter I find it of particular relevance that no objections or issues were raised in the statutory consultations with Gatwick Airport and NATS on the planning applications. In their responses on the scope of the Environmental Impact Assessment the Councils did not request that air traffic control or airspace safety be considered. In determining the applications and in their cases for the appeals RBBC and TDC as planning authorities did not express any concern on air traffic control grounds. The CAA is the airspace regulator, not the planning authorities.

80. The Appellant's case is that nothing changes at Redhill in terms of air traffic control with a hard runway. Ms Bartaby in her evidence gave assurances that the proposals would not impact on existing airspace arrangements. The rules currently applied to the use of airspace in the vicinity of the Aerodrome and airports in the area would not require modification as a result of the proposal. The controls over aircraft heights and direction would not need to change.

81. In the light of the evidence I attach no weight to the air traffic control issue in the context of this particular proposal for development. The location of the Aerodrome is near to residential areas but the proposal is not likely to significantly increase risk to the safety of these areas.

Other matters

Cultural heritage

82. There are no designated heritage assets on the Aerodrome site. In the locality are a number of listed buildings, four conservation areas and a scheduled monument south of Beltchingley. The main issue that has arisen through representations is whether the proposal would preserve the setting of the nearby listed buildings, including Crab Hill Farmhouse, Hale Farm and South Hale Farm House. The Framework defines 'setting' as the surroundings in which a heritage asset is experienced.

83. The listed buildings are farmhouses of a vernacular architecture, most of which date back to the 16th century. The settings of the buildings are not extensive and the Aerodrome does not form part of their setting. Having considered all the various observations on this matter my conclusion is that the settings would be preserved.

Air quality and climate change

84. The ES demonstrated that the proposal would not have any significant effects on air quality and that its overall impact on the ability of the UK to achieve its climate change targets would not be significant. Representations included concerns about a reduction in air quality but no technical or detailed evidence was produced to lead me to question the conclusion in the ES.

Localism

85. A core principle of the Framework is that planning should be genuinely planned, which empowers local people to shape their surroundings. In these appeals the local communities were able to present their cases. All representations, including those of local businesses, have to be taken into account and weighed in the balance.

Employment and the economy

Policy

86. A core planning principle of the Framework is that planning should proactively drive and support economic development. Therefore significant weight should be placed on the need to support economic growth through the planning system.
87. The APF states that aviation infrastructure plays an important role in contributing to economic growth through the connectivity it delivers. The value of business and general aviation and the importance of the network of aerodromes of varying sizes across the UK are specifically recognised. The economic benefit of an aerodrome, its value to the overall aerodrome network and the economic benefits of a proposed development should be considered as part of the planning application process. Even so, the benefits should be balanced against all other considerations.
88. The Tandridge Core Strategy refers to the considerable reliance on jobs outside the area and the very strong links to the wider region and to London. In developing a sustainable economy the policy is to protect the existing employment base and to provide jobs locally to reduce the very high levels of out-commuting. Policy CSP 16 restricts development at the Aerodrome site, opposing a hard runway if it is likely to lead to additional aircraft movements to the detriment of the local community. RBBC's Local Plan has a similar objective and approach to the Aerodrome in Policy Em 12. The policies are not consistent with the Framework in that they appear not to have been derived from a consideration of all three roles of sustainable development or to have taken into account the Aerodrome's role in serving business, leisure, training and emergency service needs. No such policies appear in the emerging plans. Therefore, although I have found the proposal would conflict with these development plan policies, I place little weight on this conclusion in my overall assessment.
89. The Aerodrome is located within the Coast to Capital Local Enterprise Partnership (LEP), which is developing a Strategic Economic Plan to boost economic growth in the region. The Gatwick Diamond Initiative is working

towards an internationally recognised business location achieving sustainable prosperity by 2016².

Existing economic benefit

90. The site provides 26,000 sq m of commercial floor space in hangars, offices and other buildings. Some 40 businesses are based at the Aerodrome in a mix of aviation and non-aviation sectors. Employment totals over 330 people. Direct on-site aviation-related jobs amount to 140 full time equivalent jobs (FTE). Indirect and induced effects increase the total to 180 FTE jobs. The associated GVA is around £8.1m. Total employment associated with the Aerodrome, including indirect and induced, is assessed to be currently 410 people generating a total GVA of £18.5m. The Appellant describes it as the largest employment centre in Tandridge District.
91. The Aerodrome is a base for a range of flying activities within the general aviation category, which expands its contribution in serving business, training and leisure pursuits.

Level of activity

92. The data on aircraft movements at the Aerodrome over the period 1997 to 2012 shows that there has been a decrease in the total number of movements from 92,225 to 39,908³. The downward trend has been steady in relation to fixed wing movements (around 47,000 to 16,500). The yearly number of helicopter movements show a sharp fall from a peak of over 46,000 in 1998, linked to the decision by Bristow Helicopters to move its training operation to the USA. Since 2000, movements have shown variation around 25,000 per year. The Appellant's case is that a hard runway is essential to reversing the decline.
93. Every year the grass runways are subject to waterlogging, leading to closures or restrictions on use. Nevertheless, as a matter of fact, businesses have located at Redhill in full knowledge of the grass runways and presumably their limitations. Information for 2013 shows a reversal of recent trends, whereby the total movements of 44,330 were the highest since 2007, fixed wing movements increased from 16,596 to 20,828 and helicopter movements decreased from 23,312 to 15,008. The significant increase in aircraft movements was despite the similarity in the total number of days when the runways were closed or restricted and a marked increase in the number of days when the runways were closed. A single year is not conclusive but the 2013 data suggests caution before concluding that the absence of a hard runway is the fundamental reason for the decline in fixed wing activity at the Aerodrome.
94. The decline has not only affected Redhill or airfields with grass runways. Mr Le Blond's evidence was that at Biggin Hill, which has two hard runways, total aircraft movements have declined significantly over a number of years from over 86,000 movements in 2003 to 44,264 movements in 2012. He reported an almost continuous decline in Aero Club activity, which he believed was a common trend at UK airports due to the widening of opportunities for flight training. He also referred to its seasonality, regardless of runway conditions.

² The Gatwick Diamond Initiative is a business led public private partnership centred on the area around Gatwick Airport.

³ The 2010 figures used as a baseline for the EIA: total of 41,065 aircraft movements (23,268 fixed-wing and 17,797 helicopter movements).

Mr Flower (a local resident) in his evidence supported that view. At Redhill circuits account for a significant proportion of total movements (42% in 2010) and are mostly but not wholly associated with the Aero Clubs and training. Ms Bartaby disagreed that the common trend applied to Redhill but did not substantiate the point in any detail.

95. The state of the economy and the recession probably has been a contributory factor for the overall decline in the recent past. Data produced by Ms Congdon shows that most airports in the south east (with the exception of Heathrow and Gatwick) reached a peak in business aviation flights in 2007 but suffered significant decline in traffic as a result of the onset of the recession before picking up again at several airports from 2010/11. Business aviation has not been a major sector at Redhill but the probability is that the trend was reflected by other types of flying activity. The Appellant also has identified that the deteriorating condition of the hangar accommodation at Redhill and its poor value for money has contributed to the decline in fixed wing movements. Mr Blain, whose company is Aerospace Resources Ltd, likewise stated that aircraft operators at Redhill struggle with a lack of basic 21st century infrastructure, whether a water resistant hangar or a hard runway. At most, the below standard buildings are an indirect consequence of the grass runways deterring investment.
96. There is strong evidence that the restrictions on use of the grass runways have become more onerous as aircraft design has evolved, reliability, flexibility and time savings have gained in importance and competition has increased. Businesses based at the Aerodrome, such as Aerospace Resources, Cubair and Richard Beliant Limited, have explained the particular difficulties and adjustments required to their operations. A grass runway has been a constraint on attracting new business to diversify flying activity. The uncertainty over the future has adversely affected investment and expansion at Redhill. A hard runway would overcome the inherent problems with the ground conditions that have been unable to be resolved satisfactorily by previous drainage improvements. A product such as geotextile matting would be unlikely to provide such a cost effective or long term solution.
97. In conclusion, decline in aircraft movements has been due to various reasons, although the grass runways are a very significant factor. The proposal would remove a deterrent to expansion.

Value to aerodrome network and economic contribution

98. A primary purpose of the hard runway is to allow existing Redhill companies to sustain their business and grow. Integral to this aim is to attract and expand business aviation. Ms Congdon estimated around 107,000 additional business aviation movements will need to be accommodated at airports, other than the main commercial airports, serving the London area over the period to 2030. She also explained why in all probability a significant proportion (some 53,000 movements) would not be accommodated at existing airports, such as Biggin Hill and Farnborough. Mr Leonard (for the Councils) concluded that the majority of assumptions about the business market were fairly reasonable. Gatwick Diamond Business organisation (the gdb) and the Surrey Chambers of Commerce fully supported the proposal because it would improve connectivity and convenience for all businesses and improve the attractiveness of the local area for inward investment, business retention and job creation. KRAG

disputed the basis for the growth described and regarded the achievement of 85,000 movements as speculative. Others challenged the need for the growth at Redhill on the basis that there is spare capacity at several airports, such as Biggin Hill and Fairoaks.

99. The APF support for business aviation and smaller airports is reflected in the Interim Report by the Airports Commission. The identified marked increase in business aviation is in line with policy expectations and the change being seen in the type of business aviation. Redhill potentially would have a role in meeting that demand. It has locational advantages, including its proximity to London, the motorway network and the business community around Gatwick Airport. The Aerodrome would be particularly suitable to cater for an emerging niche market for smaller business aircraft, providing a service to business users who are cost conscious and prioritise speed and convenience. The expectation is that business aviation activity would make up 24% of the total anticipated market of 85,000 annual movements by 2030. I am satisfied that the figure was based on a range of information sources and provides a realistic outcome.
100. On the assumption that the Aerodrome handles 85,000 aircraft movements a year by 2030, the expectation is an additional 140 FTE jobs, of which 120 would be direct aviation-related jobs, and a net GVA impact of £12.4m per annum. Displacement from Biggin Hill has been shown to be minimal because the two airports would serve different markets. Evidence on hangar capacity and the dominant position of Bristow indicate that the growth would not be at the expense of non-aviation jobs at the aerodrome. Opinions varied as to the significance and value to the area of the forecast economic growth and increase in employment.
101. The area has a very low unemployment rate, as indicated by a claimant count of 1.3% for Tandridge and 1.4% for Reigate and Banstead (October 2013). This represents a fall from 1.9% in 2011. Mr Crispin Blunt MP in his evidence explained that the importing of extra jobs into the area was not regarded as a priority, especially when the jobs would come with a heavy environmental penalty. There was concern over the pressure being placed on local infrastructure, housing and services.
102. The Appellant concluded from an analysis of local economic conditions that although Tandridge and Reigate and Banstead are performing well in comparison to national and regional averages, both authority areas rank towards the lowest in Surrey. 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. An intention is to offer local apprenticeships and to have involvement with local authorities' employment initiatives.
103. I consider that the development of the Aerodrome would improve accessibility and transport options, notably for local businesses with international links. Therefore in general terms the Aerodrome would fulfil a role in supporting the economic initiatives and plans of the LEP and the Gatwick Diamond Initiative. Unemployment is very low but an increase in local job opportunities is consistent with an objective of the Tandridge Core Strategy to reduce out-commuting. The growth in employment would not be through a single large employer or immediate but over a period up to 2030. This would

ease any pressure placed on the social infrastructure of the area. However, a gradual increase in jobs over a 15 year period would lessen the significance of the contribution to local employment, especially in an area that enjoys a relatively low unemployment rate.

Existing employment and Aerodrome operation

104. The Appellant explained and demonstrated that the Redhill Aerodrome Group incurred a cumulative loss exceeding £1 million over a five year period 2008 to 2012. Reference was made to the continuing loss of traffic, the deterioration of the estate, the high level of fixed costs and the lack of viable alternative business strategies. The financial position of the Group was described as precarious, now that accumulated losses had wiped out historic accumulated profits. New income streams were seen as vital to avoid a threat to viability. The Appellant was firmly of the view that the Aerodrome has to adapt its facilities in order for the businesses to survive. Otherwise there was a very real risk that the loss of tenants would be likely to result in the Aerodrome's closure in the not too distant future and the loss of all the aviation related activity from the site and some of the non-aviation jobs as well. By 2030 it is estimated that the loss to the economy would amount to 320 jobs and £20.5m of GVA which could have existed (assuming the non-aviation jobs were retained on site or elsewhere in the local area) and a reduction of 180 jobs and £8.1m GVA compared to the position today.
105. It does not follow that change should be resisted because grass runways have been in existence and served their purpose for 80 years. The evidence of the aviation related businesses demonstrated that the problems inherent with grass runways are becoming increasingly difficult to work with, as standards become more demanding and technology advances. The introduction of a paved runway would enable operational benefits to be gained, including the ability to better serve modern, more fuel efficient and quieter aircraft types. Availability and reliability would be substantially improved. Such a development would follow a trend seen at general aviation airfields over a period of time and enable Redhill to compete on a level playing field.
106. The prospect of the proposal safeguarding existing jobs was accepted by Mr Leonard in his evidence on behalf of the Councils. The statements by established firms at the Aerodrome highlighted the importance of job security to individuals. There is a good case for a hard runway on operational grounds and a reasonable expectation is that the investment would secure employment and economic benefits. More contentious is whether the failure to gain planning permission for the hard runway would lead to the closure of the Aerodrome and associated adverse consequences for jobs and the local economy.
107. In considering the prospects for the Aerodrome in the event the development is unable to proceed, the Appellant's analysis has not been entirely consistent in emphasis when describing the risks and likely effects. When the proposal was first presented in June 2011 the assumption was that the business could remain viable and could maintain traffic at current levels. The June 2012 Addendum re-examined the economic implications of a no-development scenario. The assumption in the 2011 report was found to be highly optimistic and unrealistic, given the decline in fixed wing flying (which was directly linked to the unsuitability of the grass runways) and the

dependence of the business on aviation income. The impact described was a loss of all employment and associated GVA to the local economy⁴.

108. The Appellant acknowledged the probability that some of the non-aviation jobs could remain on the site or else move to another nearby location. In oral evidence Ms Congdon explained that Bristows would probably remain but because of a lack of money to maintain buildings and services, the deteriorating fabric could lead to non aviation tenants having to relocate. Nevertheless Ms Congdon was guarded in her conclusion that 'it is difficult to be precise when this declining financial situation might lead to consideration of closure by the Aerodrome owner'.⁵ As demonstrated by the assessments, uncertainty is to be expected in forecasting, which in itself raises doubts about the worst case scenario.
109. The University of Portsmouth Business School report for the Councils accepted as valid the claim that the structure of the Aerodrome business is geared towards aviation-related activity. The potential closure of the Aerodrome relies in part on a continued downward trend in fixed wing movements and the grass runways being the primary cause of that decline. The 2013 data (referred to above) casts doubt on the first and the second has not been conclusively established. Moreover, the additional information on Group profitability, excluding one-off costs associated with the hard runway project, presented at the inquiry indicates a loss in each year between 2008 and 2011 and a very small profit in 2012. The cumulative loss over the 5 year period is considerably reduced from over £1m to £336,234. Significantly Ms Bartaby's evidence also suggested that alternative business strategies have been not fully explored and assessed. These factors add to the doubt around the closure of the Aerodrome should the hard runway not be secured.
110. The evidence from tenants indicates that the likelihood of future investment and growth at the site has been questioned and relocation options have been considered. However, despite the operational problems associated with grass runways, companies such as Harvard Aviation, highlight the advantages offered by Redhill Aerodrome (eg. location, proximity to customer base). Companies have invested despite the uncertainty over the hard runway. Such investment decisions would be expected to take into account the possibility a hard runway would not gain permission. Businesses have adapted to the facilities available. On the basis that there are no immediately obvious market alternatives for most operators at Redhill, relocation and hence loss of tenants would not necessarily follow the failure to secure a permission for a hard runway.
111. In conclusion, on the balance of probability the development of a hard runway would safeguard employment at the site by removing uncertainty over the infrastructure serving the Aerodrome. This result would benefit the businesses, the employees and the local economy. In the alternative, the failure to secure permission would not inevitably lead to the loss of existing business. The risk to the long term future of the Aerodrome would be increased but I remain sceptical about its closure. Even if the Aerodrome closed not all non-aviation jobs would be threatened. To that extent the implications for the local economy would not be as serious as indicated in the 2012 Addendum report.

⁴ Addendum to 2011 report at paragraphs 3.23 and 5.3.

⁵ Proof of evidence paragraph 8.6.

Conclusions

112. Taking account of the timescale and the area's employment characteristics, the proposal would bring economic benefits to the Aerodrome and the businesses based. The job security and growth in jobs would bring considerable benefit to individuals, widen opportunities and support the local economy. The Aerodrome would be able to develop its role in serving the business community and contribute to the economic initiatives in the surrounding area. In these respects the proposal complies with a core principle of the Framework, is consistent with objectives of the APF and the Tandridge Core Strategy. These considerations have significant weight.
113. Closure of the Aerodrome would result in a significant loss of jobs, a loss of a facility within the network of aerodromes and harm to the local economy. However, examination of the evidence indicates the risk may not be as real as the Appellant contends. The possibility adds limited weight in favour of the scheme.

Use of existing infrastructure

114. The Aerodrome has a control tower and terminal building, fire and rescue services, taxiways, hangars and other support facilities expected at an aerodrome. Aviation businesses are established and land is available to construct a hard runway within the boundary of the site without further acquisition. To this extent basic infrastructure exists for use in connection with the proposal.
115. The proposal involves new infrastructure on site – primarily the runway, lighting and drainage – and improvements to the surrounding road network. It is inappropriate development in the Green Belt. The Appellant was unable to identify specific policy support for making the best use of existing infrastructure. In the context of developing a sustainable economy Policy CSP 22 of the Core Strategy encourages the best use of existing commercial and industrial sites, especially those suitable for occupation by small businesses.
116. The proposal indirectly would lead to greater use of existing infrastructure but the development itself is new infrastructure to enable additional capacity to be created. Its acceptability is dependent on a range of factors linked to the achievement of sustainable development. I attach little weight to the best use of infrastructure argument.

Effect on the local environment

Drainage, flood alleviation and habitat enhancement

117. As part of the EIA, consideration was given to the effects of the proposal on the water environment, including water quality and flood risk. The site was described as being at medium to high risk of flooding. The construction of a hard runway and its ancillary infrastructure would change the drainage regime of the site and result in the loss of functional flood plain. In order to comply with the Framework the proposal has to ensure that flood risk is not increased elsewhere. Discussions were held with the Environment Agency and a lot of work was carried out to develop the proposals. The provision of adequate drainage, pollution control and flood compensation areas is an essential aspect of the development. The works also aim to protect Crab Hill Lane from floodwater from Redhill Brook and reduce overland flows into Salfords Stream.

118. The proposed habitat management plan, secured through a planning obligation and a construction environmental management plan are necessary to provide essential mitigation to address the identified effects on habitats and species during construction and operation. The design of the new watercourse (to replace the underground culvert) would include a habitat strategy. The proposals go no further than meeting the requirements firstly of Policy CSP 17 of the Core Strategy to protect and if possible to provide for expansion of biodiversity and, secondly, the Framework's policy aim of conserving and enhancing biodiversity.
119. The principles of the scheme designs have been demonstrated to be acceptable. The details of the proposals are capable of being resolved through planning conditions. I conclude that the proposals on flood alleviation and habitat enhancement are to ensure compliance with policy requirements and the avoidance of harm. Therefore they do not merit positive weight in the Green Belt balance.

Control on operations at the Aerodrome

120. The Aerodrome's current published opening hours are 0900 to 1900 hours during the summer and 0900 and 1700 hours during the winter. The times are subject to extension on request and flights also occur during the night time period. There are no planning conditions or obligations to control numbers of aircraft movements, hours of operation and noise emissions.
121. Construction of a hard runway would lead to an increase in flights and extension of the hours of operation. The planning controls would be necessary to limit the environmental impacts and to safeguard amenity. Without the hard runway the likelihood of reaching a comparable level of flights is remote. Moreover, at the present time mechanisms are available, such as the Redhill Aerodrome Consultative Committee, for addressing complaints on amenity issues. The prospective controls add little weight in favour of the development.

Other improvements

122. The proposed highway improvements are necessary to address the increase in traffic and pressure placed on the local road network as a result of the development. It is reasonable to expect that the Aerodrome currently provides all required measures to ensure it operates safely. Accordingly the operational benefits of the proposal are unlikely to be justified on safety grounds.

Conclusions

123. The harm to the Green Belt by reason of the inappropriate development, the loss of openness and the encroachment into the countryside has substantial weight. The harm to landscape character has moderate weight and the slight adverse visual impact a small amount of weight. The limited harm to the quality of life and learning environment through noise disturbance and the failure to satisfactorily resolve the capacity and mode of travel issues provide additional weight against the proposal. The overall weight against the proposal is very strong. This conclusion takes account of the mitigation afforded by the use of planning conditions and planning obligations.
124. On the positive side, safeguarding employment and the prospect of an additional 140 FTE jobs and a net GVA impact of £12.4m per annum by 2030 are realistic outcomes. The expansion of business aviation and support to

business initiatives in the area would be beneficial. These contributions to the local economy have significant weight. The risk of Aerodrome closure, with all the associated effects, is a consideration that provides a limited amount of additional weight. The use of infrastructure and improvements to the local environment as a result of the development provide little weight to support the proposal.

125. The other considerations, when taken together, do not clearly outweigh the potential harm to the Green Belt and the other identified harm. Very special circumstances to justify the development do not exist. The proposed hard runway development fails to comply with national policy to protect the Green Belt set out in the Framework. In addition there is conflict with Policy Co 1 and Policy RE2 of the development plan.
126. The environmental harm to an area that has a high degree of protection and is valued by the surrounding communities would significantly and demonstrably outweigh the economic benefits. The proposal would not deliver a sustainable development.
127. For the reasons given above and having taken account of all other matters raised I conclude that the appeals should be dismissed.

Diane Lewis

Inspector

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Stephen Whale of Counsel	Instructed by Reigate and Banstead Borough Council and Tandridge District Council
He called	
Andrew Benson BSc(Hons) MA MRTPI	Lead officer, Major Development Team, Reigate and Banstead Borough Council
Alan Leonard BScEcon	Lecturer, Economics and Finance Department, Portsmouth Business School, University of Portsmouth
Chris Hall BSc(Hons) MPhil MRTPI	Appeals Officer, Tandridge District Council

FOR THE APPELLANT:

Christopher Katkowski QC	
Reuben Taylor of Counsel	
They called	
Ann Bartaby BSc (Hons) DipTP MRTPI FRGS	Director of Terence O'Rourke Limited, Director and Chief Executive Officer of Redhill Aerodrome
Louise Congdon MTD	Managing Partner of York Aviation LLP
Jane Davies	A Landscape Technical Director of Terence O'Rourke Limited
Jeffrey Charles BSc MSc FIOA	Consultant of Bickerdike Allen Partners

FOR THE RULE 6 PARTIES:

Rose Grogan of Counsel	Instructed by Salfords and Sidlow Parish Council and Nutfield Parish Council
She called	
Colin Smith BA(Hons) Cllr Jim Blackmore Peter Forbes	Colin Smith Planning Salfords and Sidlow Parish Council Member of Nutfield Parish Council and Chairman of Nutfield Parish Council
Vernon Cole BSc MSME MBA CEng MIOA, FIMechE Hav	Director with Cole Jarman

Paul Murray	Secretary, Keep Redhill Airfield Green Advocate and witness
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INTERESTED PERSONS:

Tony Elias	Tandridge Councillor for Bletchingley and Nutfield
Gillian Hein MRTPI	Vice Chair of Campaign to Protect Rural England, Surrey Branch (CPRE)
Liz Ramsay	Nutfield Conservation Society
Chris Lovett	Gatwick Area Conservation Campaign
Jan Cook	Resident, King's Mill Lane
Stephen Rolph	Resident, Salfords

Hilary Brand	Resident, King's Cross Lane
Martin Graham	On behalf of residents of Henhaw Farm area and Coopers Hill Area
Graham Jeffs	Resident, Crab Hill Lane
John Twaites	On behalf of Salfords Primary School
Paul Le Blond BSc MSc	On behalf of London Biggin Hill Airport
Richard Guise	Resident
Richard Blain	Chief Executive, Aerospace Resources
Richard Berliand	Managing Director, Richard Berliand Limited
Crispin Blunt MP	Also speaking on behalf of Sam Gyimah MP
Jonathan Essex	Ward Councillor for Redhill East on Reigate and Banstead Borough Council and Surrey County Council
C G Hoskins BSc(Eng) CEng FICE	Director CH Consultancy Ltd, resident of South Nutfield
Thomas Bolton	Resident of Nutfield
Jeremy Reeves	Resident of Salfords
Peter Flower	Resident
Alan White	Godstone Village Association

DOCUMENTS submitted at the inquiry by the Appellant

- 1 Opening submissions
- 2 Updated Movement and closure information
- 3 Conclusions of General & Business Aviation study
- 4 Aircraft Noise Study 1999 Cole Jarman Associates
- 5 Speaking note by Ann Bartaby
- 6 Responses by Ann Bartaby
- 7 Speaking Note Louise Congdon
- 8 Speaking note Jane Davies
- 9 Response by Ann Bartaby in respect of drainage
- 10 Response by Louise Congdon
- 11 Recruitment leaflet
- 12 Response to issue re profitability of Redhill Aerodrome Group
- 13 Responses to matters raised on unilateral undertaking
- 14 Plan showing footpath numbers
- 15 Suggested wording for preamble
- 16 Closing submissions on behalf of the Appellant

DOCUMENTS submitted at the inquiry by Rule 6 Parties and other third parties

- 17 Opening Statement on behalf of Nutfield Parish Council and
Salfords & Sidlow Parish Council
- 18 KRAG opening statement
- 19 Statement from Sam Gyimah MP
- 20 Statement on behalf of CPRE
- 21 Plan on Surrey Hills AONB
- 22 Correspondence on highway issues
- 23 Statement of Cllr Elias
- 24 Statement on behalf of Nutfield Conservation Society
- 25 Statement of Gatwick Area Conservation Campaign
- 26 Representation by Mr and Mrs Rolph
- 27 Statement by Jan Cook
- 28 Statement by Mr Twaites on behalf of Salford Primary School

- 29 Proof of evidence of Paul le Blond
- 30 Comment by C G Hoskins
- 31 Plan submitted by Cllr Essex
- 32 Appeal decision Dunsfold Park APP/R3650/A/12/2172056
- 33 Appeal decision Sywell Aerodrome Ltd APP/H2835/A/05/1175766
- 34 Photograph Sywell Aerodrome
- 35 Statement of Cllr Essex
- 36 Statement of Peter Flower
- 37 Statement by Godstone Village Association
- 38 Note on Nutfield Parish Council decisions
- 39 Statement by Martin Graham
- 40 Statements by Richard Guise
- 41 Statement by Richard Blain
- 42 KRAG closing statement
- 43 Closing submissions on behalf of Nutfield Parish Council and Salfords & Sidlow Parish Council
- 44 *The River Club v Secretary of State for Communities and Local Government & Royal Borough of Kensington upon Thames* [2009] EWHC 2674 (Admin)

DOCUMENTS submitted at the inquiry by the Local Planning Authorities

- 45 Publicity information
- 46 Opening Submissions on behalf of the Local Planning Authorities
- 47 Note on Surrey Hills AONB
- 48 Closing submissions on behalf of the Local Planning Authorities

OTHER DOCUMENTS submitted at the inquiry

- 49 Policy EV9 of Tandridge District Local Plan
- 50 Agreed position on GVA impact
- 51 Site visit locations

PLANS

- A Location Plan 222801/TOR1
- B Proposed general arrangement C/PL/001 F
- C Proposed surface water drainage C/PL/002 C
- D Proposed aeronautical lighting C/PL/003 C
- E Proposed typical pavement cross sections C/PL/004 B
- F Proposed runway and site cross sections C/PL/005 B
- G Proposed runway and site cross sections C/PL/006 B
- H Proposed runway centre line long section C/PL/007B
- I Existing site contours C/PL/010 B
- J Proposed site contours C/PL/011 D
- K Proposed site earthworks balance C/PL/012 D
- L Proposed diversion of Redhill Brook Culvert SK1 B