Our Local Plan

Duty to Cooperate Statement Update (2018)

Tandridge District Council
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1 Introduction

1.1 As part of a local authority's Local Plan preparation the Government requires constructive and active engagement with relevant bodies, as part of an on-going process, to maximise effective working on the preparation of Plans in relation to strategic matters.

1.2 Strategic matters are by definition larger than local issues and therefore extend beyond administrative boundaries, the Government’s ‘duty to cooperate’ is considered to be the mechanism by which strategic planning takes place and strategic issues are taken into account at the local level.

1.3 The publication of the Government’s National Planning Policy Framework (NPPF) (March 2012) and Planning Practice Guidance (PPG) (published March 2014) emphasise the importance of ‘the duty’. The PPG includes detailed advice on the duty¹, and the following key messages, in particular, are:

- The duty is not a ‘tick box’ exercise and local planning authorities should focus on the outcomes and maximising the effectiveness of their plans throughout the process.
- The duty extends to the preparation of all evidence base documents which support the Local Plan – not just the plan itself.
- Consultation alone is not sufficient and a lack of response to a statutory consultation should not automatically be taken as another local authority or prescribed body agreeing that there are no strategic matters or that they have been sufficiently addressed.
- The duty is a legal requirement throughout the Local Plan preparation process and once submitted to the Secretary of State the preparation of the plan technically stops. However, the duty cannot be applied retrospectively and should be evident across the plan making process.
- The requirement for constructive and effective engagement also applies beyond the process of preparing a Local Plan e.g. the requirement for monitoring and continued joint working should be identified and implemented.
- Having an adopted Local Plan is not sufficient justification for a local authority to refuse to work with and engage constructively with another local authority. Particularly, where there is evidence to suggest that a strategic matter exists.

1.4 In a letter from a Local Plan Planning Inspector to a District Council², the following elements were itemised and detailed as being essential to demonstrating the duty to cooperate:

- Has engagement been constructive?
- Has engagement been active?
- Has engagement been ongoing?
- Has engagement been collaborative?
- Has engagement been diligent?
- Has engagement been of mutual benefit (the broad outcomes)?


² Letter from Inspector to Mid-Sussex District Council dated 2nd December 2013.
1.5 In complying with the duty to cooperate, Government guidance recommends that local planning authorities ‘scope’ the strategic matters of the Local Plan document at the beginning of the preparation process taking account of the ‘functional geography’ of the specific matter and identify those local authorities and prescribed bodies that need to be engaged.

1.6 In March 2018, the Government published a revised NPPF for consultation. Paragraph 29 of the revised NPPF sets out that:

“In order to demonstrate effective and on-going joint working, strategic plan-making authorities should prepare and maintain one or more statements of common ground, documenting the cross boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency”.

1.7 Within the revised NPPF there is also a strong focus on strategic plans setting the direction with local policies (such as Neighbourhood Plans or Area Action Plans) setting out the detail. The final revised NPPF also sets out that there is a 6 month transitional window from when the final revised NPPF is published when plans submitted within this time will be assessed against the current NPPF. The final revised NPPF is likely to be published by the end of July and therefore any Plans submitted before the end of January will be examined against the current NPPF.

1.8 The Council adopted a Duty to Cooperate scoping statement in December 2014. The scoping statement was always intended to be a live document and updated to reflect the actions taken to demonstrate that the ‘duty’ has been met, as the Local Plan is prepared. The first update to the Scoping report was published in December 2015 to accompany the Regulation 18 Local Plan: Issues and Approaches document which was formally consulted on between 18th December 2015 and 26th February 2016.

1.9 The 2016 Duty to Cooperate Statement was a further update, and set out the steps taken to comply with the ‘duty’ in preparing the Local Plan: Sites Consultation document, which was consulted upon under Regulation 18 between 4 November 2016 – 30 December 2016.

1.10 A further Duty to Cooperate Statement was prepared to support the Local Plan: Garden Village consultation, which took place from 14 August 2017 – 9 October 2017.

1.11 This Duty to Cooperate Update document is to support the Regulation 19 Local Plan, which is scheduled for consultation between 16 July 2018 – 28 August 2018. This update should be read in conjunction with the December 2014 Scoping Statement, and the 2015, 2016 and 2017 updates.

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2 The Purpose of this Statement

2.1 As recommended by Government guidance, the Council prepared a Scoping Framework in September 2014. The scoping statement 2014 was subject to stakeholder consultation before it was adopted by the Council in December 2014.

2.2 Since then, the Council has continued to prepare its Local Plan, and alongside all three Regulation 18 consultations (Local Plan: Issues and Approaches, Local Plan: Sites Consultation, and Local Plan: Garden Village Consultation), a Duty to Cooperate Statement has been prepared. This 2018 update, reflects the further steps taken in preparation of the Regulation 19 Local Plan (2018) before the Council submit the plan to the Secretary of State for Examination.

2.3 The steps taken to fulfil the ‘duty’ as set out in this update, are proportionate to the stage in the plan-making process and reflect the nature of the Local Plan: Regulation 19 document. The types of engagement which have taken place under the duty are predominantly focussed on the final plan, its spatial strategy, the sites to be allocated, unmet need, Travellers, constraints, flood risk issues, educational and health care facilities, road and rail improvements and open space provision.

2.4 Since the Local Plan: Garden Village consultation, the Council has been finalising evidence to determine which sites should be allocated, testing those proposals through transport modelling and infrastructure assessments, viability appraisals and a sustainability appraisal.

2.5 The Council has also been reviewing the comments received from the Local Plan: Garden Village consultation alongside additional evidence and determined that the most appropriate location for the Garden Community was South Godstone.

2.6 The Regulation 19 Local Plan proposes to provide 6,088 homes against an Objectively Assessed Need of 9,400 and against the Government’s figure, arising from their standard methodology, of 12,900, leaving a shortfall of between 3,312-6,812 dwellings. Whilst the Council has always identified that, due to being a 94% Green Belt authority with two Areas of Outstanding Natural Beauty (AONB), it was highly unlikely that the 9,400 homes were going to be delivered and formed part of an ongoing duty to cooperate discussions; this was more prevalent now the amount of shortfall was known and understood.

2.7 The Economic Needs Assessment identified that a need of 15.3ha of employment was required. Through intensification and protection of existing employment space, the Council propose to meet all this need but also recognised that it should have no impact on neighbouring authorities due to the different types of employment being provided (i.e small start-up units, data centres).

2.8 The Gypsy and Traveller Accommodation Assessment identified a need for 5 pitches for Gypsies and 21 plots for Travelling Showpeople. Whilst the plan does not allocate any sites, a criteria based policy has been prepared and it is likely that live planning applications could provide the 5 pitches for Gypsies. The plan also encourages the Travelling Showpeople to be provided for within the South Godstone Garden Community.

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Please note this is a précis of what work has been undertaken with more detail provided in each evidence base.
2.9 Also the Council has prepared an Infrastructure Delivery Plan (IDP) to support the Local Plan, which demonstrates the infrastructure required for the sites to come forward. For example, the IDP identifies the need for expansions in primary and secondary schools, health care upgrades, road improvements, flood mitigation measures, as well as a number of other infrastructure requirements. To prepare the IDP, infrastructure providers have been engaged and have helped to shape the final document.

2.10 The sites on neighbouring authorities’ boundaries as well as the Garden Village were likely to have the most impact and therefore have formed the majority of the conversations and discussions that have been held during the preparation of the Regulation 19.
3 Legislative Framework and National Guidance

3.1 Section 110 of the Localism Act 2011 makes a number of amendments to the Planning and Compulsory Purchase Act 2004, and places a legal duty on local planning authorities to co-operate with one another, county councils and other prescribed bodies to maximise the effectiveness within which certain activities are undertaken as far as they relate to a ‘strategic matter’.

3.2 Paragraph 33A of the Planning and Compulsory Purchase Act (as amended) states that ‘certain activities’ include:

- the preparation of development plan documents;
- the preparation of other local development documents; and
- activities that can reasonably be considered to prepare the way for the preparation of the above two points.

3.3 For the purpose of the Government’s duty to cooperate, ‘strategic matters’ relate to sustainable development or the use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas. Strategic matters also include sustainable development or use of land in a two-tier area if the development or use is a county matter e.g. minerals, waste, education, or has or would have a significant impact on a county matter.

3.4 The duty imposed on local planning authorities requires the Council to engage constructively, actively and on an on-going basis in any process by means of which the activities listed above are undertaken. The engagement required by local authorities will vary depending on the nature of the issues being addressed. These can range from consulting on an issue through to the development of a joint local development document.

3.5 Further Government guidance on the duty to cooperate is set out in paragraphs 178 to 181 of the National Planning Policy Framework (NPPF) (March 2012). Paragraph 178 states:

“Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities”.

3.6 Strategic priorities which local planning authorities should seek to deliver as part of the Local Plan are:

- homes and jobs needed in the area;
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities; and
- climate change mitigation and adaption, conservation and enhancement of the natural and historic environment, including landscape.
3.7 This update is a ‘living’ document but should be the final statement update before the Plan is submitted to an Inspector to demonstrate that the duty has been met and all activities have been effective and ongoing throughout the plan period and will continue beyond the Local Plan’s adoption. Further, the Council will prepare Statements of Common Ground to set out how the duty has been met in line with the revised NPPF and best practice.

3.8 Whilst local authorities will need to show how the duty is being taken forward on an ongoing basis through the Authority’s Monitoring Report (AMR), the Council will go beyond this and update this document at each regulation of the plan preparation.

Local Plans

3.9 In September 2015, the Planning Minister (Brandon Lewis) set up a new expert panel to consider how to simplify and streamline the making of local plans. The report by the Local Plan Expert Group was published in March 2016 and set out a wide ranging number of recommendations. One of the recommendations included giving “more bite” to the duty to co-operate, for example, by requiring local planning authorities to test and challenge a neighbouring authority’s claim that they cannot assist with unmet housing needs.

3.10 In February 2017, the Government published the Housing White Paper that considered some of the recommendations made by the Local Plan Expert Group. One recommendation in the Housing White Paper 2017, identified that there should be incentives to encourage local planning authorities to use the duty more effectively in respect of housing provision.

3.11 Another recommendation brought forward from the Local Plan Expert Group Report into the White Paper was the need for a standardised methodology on calculating the Objectively Assessed Need, which normally features heavily in Duty to Cooperate discussions.

3.12 In September 2017, the Government published their Planning for the right homes in the right places document for consultation. This document set out the standard methodology calculation and the figure that should be used (subject to new data being published), as well as a number of planning reforms that were to be included within the revised NPPF. One paragraph states that:

“…local planning authorities should start the plan-making process with a clear understanding of the number of new homes that they need in their area. While this is an essential first step, it is not the only stage in the process. Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, the Green Belt, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. They also need to engage with other authorities – through the duty to co-operate – to determine how any need that cannot be accommodated will be redistributed over a wider area. This means that the level of housing set out in a plan may be lower or higher than the local housing need”.

3.13 The consultation document also referenced the need for local planning authorities to prepare statements of common ground as the duty to cooperate was one of the main things that Local Plans were failing on.

3.14 In March 2018, the Ministry for Housing, Local Government and Communities published the revised NPPF for consultation. As set out at paragraph 1.6 of this statement, the revised
NPPF requires local planning authorities to prepare a Statement of Common Ground on main issues. It also retained the same standard methodology calculation as set out in Planning for the right homes in the right places.

3.15 Furthermore, the revised NPPF when considering the tests of soundness at paragraph 36 identify that plans should be:

“Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area’s objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”.

Recent cases

3.16 One of the most recent cases where the Duty to Cooperate legal compliance test was an issue was for Castle Point in 2017. The Inspector’s report states:

“...notwithstanding the lengthy and detailed engagement across south Essex there is no formal mechanism in place to distribute unmet housing need. In order to comply with the duty there is no requirement for this to be done by any particular means. Indeed, the outcome of joint working in this respect could take a variety of forms and it is not for me to say what they should be. Nevertheless, the position is that there is simply nothing in the New Local Plan to indicate how the unmet need for housing will be tackled. This is because the authorities have not yet deliberated about the matter in any meaningful way. Therefore the question of how the objectively assessed need will be addressed, as raised by officers in 2014, has not been adequately grappled with.

The Council is now anxious to ensure that the delivery of its objectively assessed needs is addressed with neighbouring authorities and intends to play a full and active part through the various DtC mechanisms that are now operating. There is no reason to doubt this but a failure to demonstrate compliance cannot be corrected after submission (PPG ID 9-018-20140306)".

3.17 Canterbury City Council Inspector’s Report from June 2017 states that:

“In the case of Swale Borough Council, in 2013 a request had been made to Canterbury and other local Councils to accommodate some of its unmet housing needs, which Canterbury considered that it could not meet. Since then the Swale Local Plan has been submitted for examination. This commits that Council to an early review. Swale’s position is that, in the context of its unmet need being from a relatively self-contained housing market, the short term nature of this need and the review mechanism, it is no longer necessary to address unmet need elsewhere. It has resolved that there is no longer a need to co-operate with Canterbury on this matter”.

3.18 The Waverley Local Plan Inspector’s Report from February 2018 identified that:

“Whilst the submitted plan does not contain any allowance for unmet housing need arising in Woking District, this is a matter dealt with through modifications to the housing requirement and does not demonstrate any failure under the Duty to Co-operate”.

3.19 It is also still important to reflect on a case, set out in the previous duty to cooperate statement updates, where a local planning authority failed their Duty to Cooperate; St Albans. The St Albans Local Plan contained four broad locations for residential development,
releasing areas of Green Belt land for development. Two of these locations were at land East of Hemel Hempstead, adjoining the neighbouring authority of Dacorum. The major concern was how the sites were to be counted towards housing provision, both in St Albans and Dacorum. This decision has presented St Alban with the need to resolve differences over evidence base matters, and will require them to meet housing need in an area with high housing demand, housing affordability issues and significant Green Belt constraint.

3.20 As such, there will be a need for St Albans to identify more land for development and as there is not enough previously development land and non-Green Belt land within the District, a more comprehensive and effective review of Green Belt land will be required. In addition, the evidence highlighted that St Albans was a single Housing Market Area and therefore the ability to meet unmet needs in other Housing Market Areas through the duty to cooperate was slightly weakened.

3.21 This case demonstrates the importance of duty to cooperate on sites adjoining neighbouring authorities, a need for a comprehensive Green Belt review and dealing within unmet need in an authority that is not within a defined Housing Market Area, which are all points relevant to the Tandridge District Council Local Plan.

3.22 The other cases set out show that there must be evidence to demonstrate that the duty to cooperate has been ongoing and adequately dealt with. It is also apparent that where unmet needs arise this can be dealt with through main modifications to the Plan and is not instantly a failure of Duty to Cooperate.

3.23 As such, this statement shows the ongoing discussions the Council has on duty to cooperate matters relating to plan preparation and the impact they could have on the wider area. All neighbouring authorities are happy to prepare Statements of Common Ground to ensure consideration of unmet need and that the duty has been met.
4 The main issues

Homes and jobs

3.24 The Council has updated their Housing Market Area Paper (HMA) in 2018, which recognises that:

“The original paper [HMA Paper 2015] concluded that evidence points towards Tandridge being a functional component of a HMA including Croydon, Reigate and Banstead and Mid Sussex. The latest evidence considered and presented within this paper has not challenged this conclusion. It has continued to reaffirm the important housing market relationships that Tandridge shares with these authorities. Whilst the analysis has identified some change in the strength of migratory relationships with other proximate authorities – principally Wealden – the overall strength of these relationships is notably less pronounced, and does not warrant a redefinition of the HMA”.

3.25 All neighbouring authorities have adopted post 2012 NPPF Local Plans. In addition, Mid Sussex sits in a HMA with Crawley and Horsham although through DP5: Planning to Meet Future Housing Need recognises that the “Council will work jointly and proactively with the Gatwick Diamond and the West Sussex and Greater Brighton Strategic Planning Board to address unmet housing need in the sub region”. Croydon sits within the wider London HMA and is guided by the London Plan.

3.26 Reigate and Banstead has strong links with East Surrey authorities (including Tandridge), London and Croydon authorities. However, the Reigate and Banstead Core Strategy recognises that there are a number of constraints limiting the amount of growth that can be provided. Wealden sit within a HMA within Eastbourne Borough and Eastbourne Borough Council have requested that Wealden help to meet their unmet need.

Table 1: Duty to Cooperate on Housing

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<thead>
<tr>
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<th>Actions taken</th>
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7. Regulation 19 consultation on Local Plan (July – August 2018)

What will happen next up to Examination?
1. Analyse and take on board comments from Regulation 19 consultation
2. Continue to progress the detailed work for the Surrey LSS including joint Local Plans
   and any update to the Gatwick Diamond LSS
3. Meetings with other authorities on their Local Plan progression
4. Another Duty to Cooperate meeting to continue to update neighbouring authorities
5. Seek opportunities for joint evidence bases, where appropriate.
7. Work with applicants to prepare planning applications and additional evidence.

Other Housing considerations – London and Gatwick

3.27 Whilst table 1 sets out the refined and focussed approach to duty to cooperate in regard to
   housing, there are two factors that are outside Tandridge’s control but which could have a
   significant impact on the amount of housing within Tandridge. These are London’s growth
   set out in the London Plan, including its review in 2018 and the proposed second runway at
   Gatwick.

London

3.28 Tandridge has been involved through South East England Councils (SECC) and South East
   Strategic Leaders (SESL) in the discussions with the Greater London Authority (GLA). The
   Council has commented through Surrey County Council and the Gatwick Diamond the
   constraints within our area, which prevent us from supporting London’s unmet need and as
   such the most recent London Plan commits to providing for its own needs. However, there
   are still elements within the Plan that document the strategic corridors radiating from
   London, which include the M23. The Council continue to liaise with the GLA on this matter,
   with them providing support for the Tandridge and Reigate and Banstead Housing
   Infrastructure Fund bid⁵.

Gatwick

3.29 Since December 2014 when the scoping statement was published, the Airport Commission
   held a number of consultations on different evidence base documents. The recommendation
   was for the expansion to occur at Heathrow.

3.30 However, the Council understand Gatwick still wishes to support a planning application for a
   second runway in 2019. Tandridge District Council is continuing to work closely with Gatwick
   Diamond authorities and Gatwick Airport Limited (GAL) to understand any proposed plans
   and the implications this may have for Tandridge. Tandridge has signed a Memorandum of

⁵ Please note this is a County bid but relates to the areas of Tandridge, Reigate and Banstead and Mid Sussex.
Understanding with all the authorities that are affected to this effect. A Gatwick Officer Group reports on any emerging information to the Gatwick Joint Leaders.

**Travellers**

3.31 Mid Sussex, Reigate and Banstead and Elmbridge jointly prepared a Gypsy and Traveller Accommodation Assessment. These authorities then shared their methodology with the Surrey authorities for consultation and for those authorities to utilise in their own assessments.

3.32 The GTAA identified that the need in Tandridge was for 5 Gypsy pitches and 21 Travelling Showpeople plots. Tandridge recognise that they can meet their needs through live planning applications and the Garden Community. However, where this may not be possible there have been discussion with Reigate and Banstead how each authority may be able to assist to meet each other’s need.

**Table 2: Duty to Cooperate on Travellers**

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In addition the other activities with the duty to cooperate bodies have been ongoing:
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5. Seek opportunities for joint evidence bases, where appropriate.
7. Work with applicants to prepare planning applications and additional evidence.

**Employment**

3.33 The Council updated their Economic Needs Assessment and published their Economic Proposition in November 2017. Both supported employment growth in the District through utilising existing land and identifying that strategic employment sites could be essential to this provision. The ENA identified that the District’s employment need could be met through intensification and protection of existing sites and that due to the loss of office in the town centres, further opportunity should be sought to reverse this trend. This has been assisted through the development of Oxted and Caterham town centre regeneration schemes and through the employment hierarchy policy within the Plan.

3.34 Apart from the Garden Community (which will not commence until 2026), the plan is providing for small amounts of intensification and there should be no direct competition with neighbouring authorities’ employment areas.

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Retail and Leisure

3.35 The Retail and Leisure Study 2015 was updated alongside the preparation of a town and local centre review document in 2018. Both can be found on the Council’s website – under technical assessments page. The Retail and Leisure Study Update 2018 confirmed the 2015 report in that the

“...comparison goods retail capacity projections assume centres within Tandridge District will experience some impact from the proposed developments in neighbouring authorities, in particular major development in Croydon (Westfield/Hammerson)”.

3.36 This has resulted in limited capacity for new comparison goods floorspace up to 2023. In addition, this competition has an impact on the food and beverage offer within the District. The Study also identified that residents in Tandridge District have relatively good access to a range of commercial leisure and entertainment facilities in neighbouring authorities, where most of the key sectors are represented; particularly through the major leisure parks in Croydon and Crawley. Due to the relatively small catchment population in towns in Tandridge District and the strong choice in neighbouring areas, there is a limit to provide major commercial leisure facilities in the District.

3.37 The Study identifies that the District can accommodate some growth in Retail and Leisure, this is mainly through utilising vacant floorspace, proposed regeneration schemes, and the Garden Community.

3.38 Through Duty to Cooperate discussions no strategic issues with retail and leisure have been raised. Although if anything emerges prior to submission of the Local Plan, it will be picked up in the Statement of Common Ground with the relevant authority.

Infrastructure

3.39 The Council fall within two Infrastructure Study areas: Gatwick Diamond and Surrey County Council. The Gatwick Diamond Infrastructure Study was published in 2016. The Surrey Infrastructure Study was published in 2016 and then more recently updated in 2017 (published in 2018) to reflect emerging plans⁶. Both finalised Infrastructure Studies are available to view on the Council’s website and look at what infrastructure provision is required and seek to identify any potential funding gaps. When appropriate, it is foreseen that the studies will be updated.

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⁶ Please note no decision had been made about sites for Our Local Plan when the Surrey Infrastructure Study was being prepared, therefore it does not set out the latest position for Tandridge District.
The Council in the preparation of their Local Plan has been liaising with infrastructure providers and adjoining authorities. Further, the Council has built on the work previously undertaken and has prepared and published an Infrastructure Delivery Plan (IDP) that will sit alongside the Local Plan. The IDP has been developed with the assistance of the relevant infrastructure providers; Parish Councils and utilising local knowledge gained from Ward Members, and is a live document that will be updated as and when more information is received.

**Water Supply**

The Council has commissioned a Water Cycle Study, which is being reported in 3 parts, to identify the impact on water supply and hydrology issues. The key highlights from the study have indicated that the region is water stressed (in that supplies are relatively low in comparison to need) with the potential for shortages in supply from 2047 unless policies are put in place to reduce water consumption. As a result the Tandridge Local Plan includes policies which seek to reduce water consumption to 110 litres per day per person or below and encourage more efficient use of water resources.

**Waste Water**

As part of the Water Cycle Study, the Council has been exploring with waste water companies and adjoining authorities the capacity of existing treatment works within the District and with the Environment Agency, the Council has been exploring water quality. More detail in relation to these matters is set out in the Water Cycle Study; however adjoining local authorities were invited to indicate planned developments in their respective areas in order to establish what, if any, cross boundary impacts may arise as a result of development identified in the Tandridge Local Plan and their respective plans. In the majority of cases there were no cross boundary issues identified in relation to waste water, however some capacity issues were identified in relation to waste water treatment works located in Reigate and Banstead Borough. The Council will continue to work with the water providers, the Environment Agency and Reigate and Banstead to forward plan improvements to capacity, including the preparation of the Stage 3 Water Cycle Study.

In relation to water quality, it has been identified that a number of rivers and tributaries which flow into the River Medway via the River Eden within Sevenoaks and further into Kent and rise within Tandridge are considered to be of poor water quality. As a result the Council has included Green/Blue Infrastructure policies within the Local Plan and identified a requirement for enhancements in the IDP to assist in improving water quality within the Upper Medway Catchment. Further, the Council has committed to a Green/Blue Infrastructure Supplementary Planning Document that will be prepared in connection with neighbouring authorities.

**Flooding**

The Council has also undertaken a Level 1 and Level 2 Strategic Flood Risk Assessment (SFRA). The Level 1 was prepared within Reigate and Banstead and Mole Valley. Level 2 was undertaken in relation to Tandridge only as it was site specific. Both documents are published on the Council’s website. There are also a number of Flood Alleviation Projects that the Council is working on with partners:
3.45 **Caterham Bourne Flood Alleviation Project** is looking to identify mid to long-term measures to reduce and manage the flood risks along Caterham Bourne. The project will improve understanding of the catchment, and seek to understand what measures can be taken to reduce flood risk. The measures will be assessed to identify which would provide the maximum economic, environmental and social benefits with the available funding and contributions. Recommendations from this project will be available around mid 2019. The Local Plan will play a key role in assisting with the delivery of the selected flood alleviation measures and for this reason Tandridge District is a member of the project team. Other members are:

- Croydon Council
- Surrey County Council
- Environment Agency
- Thames Water
- Sutton and East Surrey Water

3.46 **Caterham on the Hill Flood Alleviation Project** is seeking to identify mid to long-term measures to reduce and manage flood risk in the Caterham on the Hill Parish and across the border at Old Coulsdon in the London Borough of Croydon. The project has been instigated in order to address flood risk in what is a built-up area of the District where large scale interventions are unlikely to be deliverable. As such the Local Plan proposes a more stringent flood risk management policy and the Council has begun exploring other mechanisms such as Critical Drainage Areas in order to reduce flood risk. Recommendations from this project are expected by the end of 2018. Tandridge District Council is represented on the project team and other members are

- Croydon Council
- Surrey County Council
- Environment Agency
- Thames Water

3.47 **Smallfield Flood Alleviation Project** was initially set up to undertake an assessment of flood risk management options at Smallfield following the allocation of £30,000 from the EA’s Local Levy and a further £300,000 of Tandridge District Strategic Community Infrastructure Levy (CIL) funds to assist in delivering a scheme. However, following a meeting with Reigate and Banstead it was decided to carry out a joint study covering the catchment. The project board has commissioned Atkins to carry out the study. The recommendations from the Study and some alleviation measures are expected by the end of 2018. The group consists of:

- Tandridge District Council
- Reigate and Banstead Borough Council
- Surrey County Council
- Environment Agency

### Table 4: Duty to Cooperate on Flooding

<table>
<thead>
<tr>
<th>Who the Strategic Matters need to be discussed with</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Croydon LBC</td>
</tr>
<tr>
<td>• Reigate and Banstead BC</td>
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<tr>
<td>• Environment Agency</td>
</tr>
</tbody>
</table>
Sutton and East Surrey Water
Thames Water
Surrey County Council

Actions taken

Between the Duty to Cooperate Statement update of August 2017 and this update statement (June 2018), the Council has been continuing to prepare and collate evidence and prepare a Regulation 19 Local Plan.

In addition the other activities with the duty to cooperate bodies have been ongoing:

1. Numerous other meetings with the EA, Reigate and Banstead, Croydon and Surrey County Council to discuss emerging evidence and modelling work as well as possible flood intervention measures.
2. Numerous meetings with the Caterham Bourne Flood Alleviation Project Board. It is anticipated that the findings and recommendations will be finalised by the end of 2018.
3. Numerous meetings with the Caterham on the Hill Flood Alleviation Project Board. It is anticipated that the findings and recommendations will be finalised by the end of 2018.
4. Numerous meetings with the Smallfield Flood Alleviation Project Board. It is anticipated that the findings and recommendations will be finalised by the end of 2018. Further, it is anticipated that a replacement and larger culvert pipe will be provided below a Public Right of Way between Wheelers Lane and Weatherhill Road by the end of the year, making use of the committed £300,000 CIL funds provided by Tandridge District Council.
5. Regulation 18 Consultation on options and the Strategic Flood Risk Assessment Level 1 (December 2015 – February 2016)
6. Collaborative Planning Policy writing specifically in relation to managing flood risk
7. Shared draft of Local Plan on 8 June and the draft IDP inviting informal comments
8. Regulation 19 consultation on Local Plan and IDP (July – August 2018)

What will happen next up to Examination?

1. Analyse and take on board comments from Regulation 19 consultation
2. Continue to meet with the various Flood Action Groups as appropriate
3. Meetings with all the project boards to continue through until project completion, considering how CIL and s106 can be utilised to help fund these projects.
4. Explore further the implications of designating Critical Drainage Areas within the district
5. Continue to work with infrastructure providers, including the Environment Agency on water related issues
6. Prepare a Stage 3 Water Cycle Study
7. Prepare a Green/Blue Infrastructure Supplementary Planning Document
8. Update and roll forward infrastructure projects and available funding into the Surrey Infrastructure Study and where relevant the Gatwick Diamond Infrastructure Study
9. Continue to support through planning applications and funding support and update the IDP as more information is received

Other infrastructure

Other infrastructure can include health, education, transport, highways, emergency services and Green/Blue Infrastructure. The Infrastructure Delivery Plan which accompanies the
Regulation 19 draft Local Plan sets out the infrastructure requirements to meet the needs within the Local Plan as well as local aspirations for infrastructure improvements, estimated costs and potential funding arrangements.

The provision of health, security, community / cultural infrastructure and other local facilities

Health service provision

3.49 The Council has actively engaged with health service providers including the Clinical Commissioning Group and GPs to identify their proposed strategies for the delivery of health care within Tandridge in order to meet the existing and additional needs of the District as a result of the Local Plan.

3.50 The main areas for discussion have been around the move towards larger health and social care hubs as opposed to the provision of smaller practices or satellite surgeries. It is clear from discussions that there is under provision in large parts of the District even without the Local Plan growth. The Local Plan provides an opportunity to address some of the existing capacity issues as well as providing new health accommodation to meet increased demand in the future. The Local Plan identifies that a relocated and substantially enhanced provision can be accommodated as part of a new Garden Community, in addition to expansion at Lingfield Surgery, Oxted Surgery and two surgeries in the north of the District.

3.51 Furthermore discussions have been ongoing around the North Tandridge One Public Estate project to address enhanced provision at the Caterham Dene Hospital site as part of a comprehensive scheme which meets the new health and social care hub model advocated by the CCG.

Table 5: Duty to Cooperate on Health Service Provision

<table>
<thead>
<tr>
<th>Who the Strategic Matters need to be discussed with</th>
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</thead>
<tbody>
<tr>
<td>- East Surrey Clinical Commissioning Group</td>
</tr>
<tr>
<td>- NHS England</td>
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<tr>
<td>- Surrey and Sussex Healthcare Trust</td>
</tr>
<tr>
<td>- Director of Public Health (via Surrey County Council)</td>
</tr>
<tr>
<td>- Local primary care providers (GPs, Dentists and pharmacists)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Actions Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Between the Duty to Cooperate Statement update of August 2017 and this update statement (June 2018), the Council has been continuing to prepare and collate evidence and prepare a Regulation 19 Local Plan.</td>
</tr>
<tr>
<td>1. Discussions have taken place in October 2017 and April 2018 with Local GP Surgeries to understand current capacity issues and individual surgery needs/aspirations. These conversations have focused on constraints to service delivery only so far as planning can influence as well as ability to accommodate Local Plan growth.</td>
</tr>
<tr>
<td>2. Discussions with local GP surgeries and CCG on potential relocation of one surgery to the Garden Community to create combined Health and Social Care Hub</td>
</tr>
<tr>
<td>3. Discussions with the East Surrey CCG, NHS England and Surrey and Sussex Healthcare Trust to understand existing capacity issues and potential issues arising from the Local Plan</td>
</tr>
<tr>
<td>4. Discussions on potential costs of expansion and provision of services at existing</td>
</tr>
</tbody>
</table>
surgeries, supporting planning applications and funding arrangements

What will happen next up to Examination?

1. Analyse and take on board comments from Regulation 19 consultation
2. Start review of the Community Infrastructure Levy to identify where additional funding can come from.
3. Update and roll forward infrastructure projects and available funding into the Surrey Infrastructure Study and where relevant the Gatwick Diamond Infrastructure Study
4. Continue to support the health service through planning applications and funding support and update the IDP as more information is received
5. Ongoing discussions with all health partners to establish what support can be provided through planning and CIL.

Security

3.52 The Council is not aware of any security issues that are likely to have land requirements in the District. As such no strategic matters have been identified.

Education

3.53 Whilst Surrey School Commissioning recognises there are spare school places in Tandridge as a whole, this disguises the pressure on places locally. In line with the additional capacity provided at Infant level over the past 3 years at Downs Way, Marden Lodge and St Francis, there is expected to be a pressure on junior places in Oxted & Limpsfield in the short- to medium-term.

3.54 It is also anticipated that there will be a short- and long-term need for additional primary school places in the north of Tandridge. As a result of the Local Plan there is a need for at least two additional primary schools and one secondary at the South Godstone Garden Community. In addition a number of existing schools are identified to expand (St Marys, St Peters Tandridge and Burstow), as well as two schools being proposed to relocate to new sites (Warlingham Village and Holland Infant & Juniors) in order to allow for modern and improved/expanded facilities to be provided at primary level. At secondary level one school will need to be expanded in the north of the District.

3.55 Overall, the District is a net importer of students from outside of the county. This means that there are more children from outside of Surrey attending Tandridge secondary schools than there are Tandridge children attending out of county secondary schools. This is largely because the location of schools near to the county boundary means that catchment areas include parts of the neighbouring London Borough of Croydon. The IDP identifies school expansion projects in order to meet forecasts and to not have an adverse impact on neighbouring areas.

Road Networks and Public Transport

3.56 The Council has worked with Surrey County Council (SCC) to run a strategic transport model, to test for issues with the road network following the implementation of development as part of the Local Plan. The transport model was run testing a variety of options (although all were based on worst case scenarios). More information on the transport model can be found in the Strategic Highways Assessment Report 2018.
3.57 Discussions were had with SCC and neighbouring authorities at Duty to Cooperate meetings to establish whether there were any opportunities to model development proposed in neighbouring areas in order to understand the full impact on the road network within Tandridge and also across boundaries. This element is picked up in the Strategic Highways Assessment Report. Where impacts have been found on the boundary (Felbridge junction) or across boundary such as at Copthorne in Mid Sussex. The Council has committed to continue to work with these partners on a joint mitigation scheme to address these impacts and have been successful in the first round to secure funding through the Housing Infrastructure Fund.

3.58 Furthermore, where impacts were identified, the Council prepared mitigation measures for those junctions that were re-run in the Strategic Highways Model to ensure that impact on the relevant junctions and the road network could be alleviated. The Council had a number of potential solutions that can be modelled for each impacted junction and through analysing the mitigation measures could assess which would yield the best outcome; a decision was made as to which mitigation measures should be re-tested through the Strategic Highways Model. The Strategic Highways Model identified that when all mitigation measures were re-run, some had a negative impact on the road network. In addition, West Sussex County Council requested that option appraisals were run for the Felbridge and Copthorne (Hotel) junction. For these reasons, prior to examination, the Strategic Highways Model will be re-run to take these factors into account.

3.59 The Council engaged with Highways England and the Department for Transport in relation Junction 6 of the M25 motorway and a potential new motorway junction on the M23 to understand capacity issues, timing of delivery, cost and to try and establish an agreed option. Highways England expressed concerns about a new junction on the M23 and that a lot more work was required on this proposal. The need for a new junction and its uncertainty was one of the reasons why it was concluded that the Redhill Aerodrome Garden Community would not come forward within the plan period. Highways England also indicated that they would like to see a consideration of various Junction 6 options and why each has been discounted. A High Level Mitigation Options Paper has been produced which is in Appendix B.

3.60 In addition the Council has identified with Surrey County Council requirements for improvements to the Cycle Network and Bus operations. Details in relation to identified measures as a result are included within the IDP. Key elements include improvements to the bus network to provide improved shelters and real time information, improved off road cycle lane provision along the A22 and the A25 and cycle improvements to railway stations.

3.61 In relation to the rail network meetings have been held with Network Rail to discuss a wide range of issues affecting the District. Discussions have taken place in relation to mobility impaired access at Lingfield, station improvements to create a transport hub at Godstone as a result of a new Garden Community, as well as regeneration plans at Caterham and at Oxted.

Table 6: Duty to Cooperate on Education, Highways and Public Transport.

<table>
<thead>
<tr>
<th>Who the Strategic Matters need to be discussed with</th>
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</thead>
<tbody>
<tr>
<td>• Mid-Sussex DC</td>
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<tr>
<td>• Croydon LBC</td>
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<tr>
<td>• Reigate and Banstead BC</td>
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<tr>
<td>• Wealden DC</td>
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<tr>
<td>• Sevenoaks DC</td>
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<tr>
<td>• Highways England</td>
</tr>
<tr>
<td>• Department for Transport</td>
</tr>
<tr>
<td>• Network Rail</td>
</tr>
<tr>
<td>• Bus Operating Companies (via Surrey CC)</td>
</tr>
</tbody>
</table>
Actions taken

Between the Duty to Cooperate Statement update of August 2017 and this update statement (June 2018), the Council has been continuing to prepare and collate evidence and prepare a Regulation 19 Local Plan. In addition to the statutory consultation requirements, the Council shared a draft of the Regulation 19 with Duty to Cooperate bodies and also explained the spatial strategy and sites allocated at several meetings.

In addition the other activities with the duty to cooperate bodies have been ongoing:
1. The Council has held numerous meetings with Surrey County Council as the Commissioner for School Places to understand capacity requirements, the geographical location of these requirements and potential funding costs.
2. The Council has actively engaged in a Joint Infrastructure Team and Joint Local Committee in order to encourage joint working on infrastructure requirements including in relation to education and highways matters.
3. The Council has engaged directly with those schools that have expressed an interest in expanding and directly sought to engage with the Council and Surrey County Council.
4. Meetings with Highways England and Department for Transport to understand the implications for the strategic road network
5. Meetings with Network Rail and Govia to determine what improvements are required on the rail network and what funding could be available
6. Meetings with Surrey on bus provision and cycle/walk ways to be provided
7. Finalised the Surrey Infrastructure Study
8. Regulation 19 consultation on Local Plan and IDP (July – August 2018)

What will happen next up to Examination?

1. Analyse and take on board comments from Regulation 19 Consultation
2. Start review of the Community Infrastructure Levy to identify where additional funding can come from.
4. Continue to engage with partner authorities and schools to understand the latest position and assist in delivery (including funding arrangements)
5. Continue to engage with the Joint Infrastructure Team and Local Committee to establish a five year project plan
6. Continue to liaise with Highways England and Department for Transport for strategic highways related issues
7. Continue to engage with Network Rail, bus providers and Surrey County Council on promoting improvements to sustainable modes of transport.
8. Update and roll forward infrastructure projects and available funding into the Surrey Infrastructure Study and where relevant the Gatwick Diamond Infrastructure Study
9. Undertake feasibility assessments and options appraisals with Mid Sussex, West Sussex and Surrey County Council in relation to Copthorne and Felbridge
10. Re-run the strategic highways model to take account of most up to date information where appropriate
11. Update the IDP as more information is received
Other community and cultural infrastructure

3.62 The Council has been working with the London Borough of Croydon through a planning application on Greenlawns to determine whether there is a possibility to assist in meeting Croydon’s need for burial space as well as some of Tandridge District burial space need.

3.63 The Council has jointly prepared with East Surrey authorities an East Surrey Tourism Project that considers a range of tourism assets and accommodation provision across East Surrey. This document is published on the Council’s website. Consideration has also been given to green and blue infrastructure in the plan with commitment to prepare a Green/Blue Infrastructure Strategy which will take account of cross boundary implications and pathways.

Climate change mitigation and adaption, conversation and enhancement of the natural and historic environment, including landscape

3.64 In order to understand the impact on climate change, the natural and historic environment, the Council undertook three air quality assessments; human health, Ashdown Forest and the Mole Gap to Reigate Escarpment. The Ashdown Forest air quality assessment was undertaken using the same methodology as had been employed by Tunbridge Wells and Sevenoaks Councils, and the same methodology was then transferred to the Mole Gap to Reigate Escarpment air quality assessment, which was jointly prepared with Reigate and Mole Valley Councils.

3.65 The air quality assessments were used to inform the Council’s Plan and Habitats Regulation Assessment, which requires the ‘in-combination’ effect to be understood. The ‘in-combination’ effect relates to whether there would be an adverse impact created from the multitude of authorities around the European designated site (i.e. the Ashdown Forest or the Mole Gap to Reigate Escarpment). All three reports identified that there is no adverse impact on the integrity of the European sites over the plan period in combination with other plans.

3.66 Nevertheless, the Council worked with a number of other authorities to agree a Statement of Common Ground on air quality impacts on the Ashdown Forest. The forum that prepared the Statement of Common Ground will continue to monitor the long-term trends and safeguard against adverse impacts on the forest.

3.67 As there are two separate matters which require consideration in terms of adverse impacts on the Ashdown Forest; air quality and recreational disturbance, another Statement of Common Ground with the same authorities is currently being prepared to deal with the recreational issues. Furthermore, the Council has signed an inter authority agreement with Wealden, Lewes, Mid Sussex, Tunbridge Wells and Sevenoaks authorities to pay a tariff from relevant development towards the Strategic Access Management and Monitoring (SAMM) of the Ashdown Forest. The relevant development is stipulated by the specific authority; the Local Plan in policy TLP36 identifies that all residential development within 7km of the Special Protection Area boundary will need to contribute to the SAMM.

3.68 Surrey County Council is preparing their Waste Plan which has considered Lambs Business Park for a waste allocation that could be associated with energy generation. The Council has been in discussion with Surrey County Council that in the event of the site accommodating a new Energy for Waste plan, it should be designed to enable the future use of surplus heat to
serve the South Godstone Garden Community and the operations of Lambs Business Park. The Council will continue to work with Surrey County on this matter.

3.69 Surrey Hills and High Weald Areas of Outstanding Natural Beauty (AONB) Units are jointly preparing their respective Management Plans with the affected authorities. Tandridge District Council has also been engaging with the High Weald AONB unit on the Environmental Colour Assessment Document\(^7\) and the emerging design guide for development within the AONB. These documents have all be prepared to ensure the protection of the AONBs and are implemented by the AONB units, which Tandridge District Council sits on. In addition, the Council shared a version of the draft AONB policy with the units for feedback.

3.70 The Government on 27 May published their paper on National Parks and AONB reviews\(^8\) relating to whether the protection was still fit for purpose. The review report is due to be published in July 2019 but is not likely to replace the more local review of the Surrey Hills AONB, which is expected to take place by the end of 2018. The local review will consider the role of the AONB candidate areas and whether they should formally become part of the AONB. The Council will continue to work with Surrey Hills AONB unit on this matter.

3.71 The Council in 2015 and 2016 worked with Surrey Wildlife Trust (SWT) (which forms part of the Local Nature Partnership) in undertaking a review of the potential Sites of Nature Conservation Interest (pSNCIs); as a result four pSNCIs were designated as full SNCIs by the Local Partnership Board. Our Local Plan identifies that, where resources and landowners allow visits and surveys to be undertaken on the site, the Council with SWT will continue to assess the remaining pSNCIs.

3.72 The Council has also embraced the work done by the Surrey Nature Partnership through the identification of Biodiversity Opportunity Areas in the Local Plan and to ensure consistency, the Council shared the draft Biodiversity, Ecology and Habitats policy with the Local Nature Partnership.

3.73 The Council has been liaising with Historic England to ensure that Heritage Assets are identified in the Plan through utilising the Historic England Register, which Historic England is content with.

Table 7: Duty to Cooperate issues on Climate Change, Natural and Historic Environment

<table>
<thead>
<tr>
<th>Who the Strategic Matters need to be discussed with</th>
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<tbody>
<tr>
<td>• Mid-Sussex DC</td>
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<tr>
<td>• Reigate and Banstead BC</td>
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<tr>
<td>• Mole Valley DC</td>
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<tr>
<td>• Wealden DC</td>
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<tr>
<td>• Sevenoaks DC</td>
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<tr>
<td>• Bromley LBC</td>
</tr>
<tr>
<td>• Crawley BC</td>
</tr>
<tr>
<td>• Lewes DC</td>
</tr>
<tr>
<td>• South Downs National Park</td>
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</tbody>
</table>

\(^7\) This is a palette of colours that are acceptable for development in the High Weald AONB.

Between the Duty to Cooperate Statement update of August 2017 and this update statement (June 2018), the Council has been continuing to prepare and collate evidence and prepare a Regulation 19 Local Plan. In addition to the statutory consultation requirements, the Council shared a draft of the Regulation 19 with Duty to Cooperate bodies and also explained the spatial strategy and sites allocated at several meetings.

In addition the other activities with the duty to cooperate bodies have been ongoing:

1. General ‘duty’ meetings/teleconferences with all to discuss their emerging evidence, and Local Plan updates
2. Undertook joint air quality assessments ‘in combination’ with other plans
3. Shared draft policies of Local Plan May-June 2018
4. Meeting on 13/14 June 2018 set out in Appendix A
5. Signed and agreed the Statement of Common Ground for the Ashdown Forest on air quality
6. Signed and agreed the Inter Authorities Agreement on the Strategic Access Management and Monitoring of the Ashdown Forest
7. Engaged with Surrey County Council on the Waste Allocation at Lambs Business Park
8. Regulation 19 consultation on Local Plan (July – August 2018)

What will happen next up to Examination?

1. Analyse and take on board comments from Regulation 19 consultation
2. Continue to prepare Statement of Common Ground on the recreational pressures for Ashdown Forest
3. Continue to jointly work on the AONB Management Plans and the Surrey Hills AONB review.
4. Continue to review the potential Sites of Nature Conservation with Surrey Wildlife Trust
5. Continue to explore with Surrey Waste Plan to provide opportunities for renewable energy at Lambs Business Park
Appendix A – Duty to Cooperate Meetings on 13/14 June 2018

Duty to Co-operate Meeting – Tandridge District Council and Sevenoaks District Council

Wednesday 13th June 2018

Present: Sarah Thompson (ST) (TDC), [Hannah Gooden] (HG) (SDC)

ST provided an update on the preparation of the Tandridge Local Plan, which included showing a map of the District and indicated those sites that would be allocated in the TDC Local Plan that would be relevant to Sevenoaks as they are near the boundary of the areas. TDC will be publishing their Local Plan on 21st June 2018, putting it to Committee on 3rd July and subject to committee approval, running their Consultation from Monday 16th July to Tuesday 28th August 2018.

HG confirmed that SDC Regulation 18 Local Plan had been published for committee and considered a number of ‘exceptional circumstances’ sites, including the Which Way Westerham bypass proposals which also promoted 600 homes close to the TDC boundary. The Regulation 18 was due to be consulted on Monday 16th July to 10th September 2018 (subject to Cabinet approval on 12th July).

ST reported that TDC hope to meet a target around 6,150 new homes, not close to their 9,400 identified housing needs, or the Government target of 12,900.

HG reported that the SDC Reg 18 Plan outlines sites for approximately 13,400 new homes, but it includes 12 potential ‘exceptional circumstances’ sites in the Green Belt which are still subject to testing. The OAN for SDC is 12,400 and the government ‘Local Housing Need’ figure is 13,690.

Following receipt of SDC’s comments on the TDC Local Plan, a draft Statement of Common Ground will be circulated to SDC by TDC by the end of September 2018. It is anticipated that a final version of the Statement of Common Ground will be signed by Members on both sides in November 2018.
Duty to Co-operate Meeting – Tandridge District Council and Wealden District Council

Wednesday 13 June 2018
(By telephone)

Present: Sarah Thompson (ST) (TDC) and Marina Brigginshaw (MB) (WDC)

ST provided an update on the preparation of the Tandridge Local Plan, including indicating those sites that would be allocated in the TDC Local Plan that would be relevant to Wealden District Council as they are near the boundary of the two areas. TDC will be publishing their Local Plan on 21st June 2018, putting it to Committee on 3rd July and, subject to committee approval, running their Consultation from Monday 16th July to Tuesday 28th August 2018.

MB confirmed the timetable for the Wealden Local Plan which involves the publication of the Local Plan for committee on 27th June 2018. The Plan will be considered by Committees on 5th and 6th July before consideration by Full Council on 18th July. Regulation 19 consultation will commence in August 2018 (date not yet identified) to the beginning of October with an anticipated date of submission by the end of the year.

It was agreed that a Statement of Common Ground (SoCG) would be prepared by TDC. Consideration would be given as to how to respond to the Ashdown Forest as WDC were not a signatory to the SoCG on the Ashdown Forest.

ST reported that TDC hope to meet a target of 6,150 new homes, not close to their 9,400 identified housing need, or the Government target of 12,900. WDC standard methodology is 950dpa (2013 to 2028), which is similar to the current Government LHN (2017). WDC can meet this need, although there is some overlap in the calculation of need with the area which is covered by the South Downs National Park. Windfall allowance is included within the housing delivery, but due to the implications of development on the Ashdown Forest, it will be directed to different settlements within Middle Super Output Areas.

WDC sits in a Housing Market Area which includes Eastbourne Borough and Eastbourne Borough Council has requested that WDC help them to meet their unmet need. In addition to issues regarding Ashdown Forest, WDC consider that this would be reliant on the provision of an off line A27 (as well as other junction improvements), which isn’t due to be delivered at the earliest (subject to agreement of funding) until mid 2030.

WDC are meeting its own need for Gypsy and Traveller pitches with the delivery of 21 pitches, the majority of which is being met through land owned by the Council.

MB explained how mitigation to the Ashdown Forest was being drawn up as well as the Plan needing to consider constraints to the South.
Duty to Co-operate Meeting – Tandridge District Council and Mid Sussex District Council

Wednesday 13 June 2018

Present: Sarah Thompson (ST) (TDC), Nicola Walters (NW) (TDC) and Alice Henstock (AH) (MSDC)

ST provided an update on the preparation of the Tandridge Local Plan, which included showing a map of the District, and indicated those sites that would be allocated in the TDC Local Plan that would be relevant to Mid Sussex as they are near the boundary of the two areas.

ST reported that TDC hope to meet a target of 6,150 new homes, not close to their 9,400 identified housing need, or the Government target of 12,900. AH confirmed that whilst MSDC hope to be able to meet their own housing need, they have also had to accommodate some of Crawley’s unmet need.

ST explained that the Garden Community in South Godstone will not be implemented until 2026. One of the mitigation measures will be on the Felbridge Junction and Junction 6 of the M25 however WSCC have expressed the opinion that both the Felbridge and Copthorne Junctions are already areas of concern.

AH reported that MSDC are currently in the process of sifting through identified sites (“SHELA” published in April 2018) and eliminating those that don’t meet their strategy. They are working with members to get a shorter list of options for landscape assessment, transport modelling and other more detailed assessment work. Taking an update report to Members on 4th July 2018 and they hope to sign off a finalised list of sites to take forward on 12th September 2018. It was agreed that both Councils would continue to liaise on sites and the issues surrounding the affected junctions to work together to find solutions with West Sussex County Council and Surrey County Council.

TDC will be publishing their Local Plan on 21st June 2018, putting it to Committee on 3rd July and, subject to Committee approval, running their Consultation from Monday 16th July to Tuesday 28th August 2018.

Following receipt of MSDC’s comments on the Local Plan together with a copy of the list of sites they will take forward to their own consultation in summer 2019, a draft Statement of Common Ground will be circulated to MSDC by TDC incorporating this information for their comments.

Following the meeting, Sarah Thompson had a telephone call with Caroline West (CW) of West Sussex County Council (WSCC).

CW raised concerns felt by WSCC regarding education and transport as a result of the TDC Local Plan. ST reassured her that the issues regarding education were being dealt with by Surrey County Council (SCC) and WSCC will liaise direct with SCC on this issue.
Regarding the Felbridge and Copthorne Junctions, WSCC require feasibility assessments for these junctions to demonstrate mitigation measures are deliverable and feasible and this needs to be followed up by ST with SCC as a matter of urgency.
Duty to Co-operate Meeting – Tandridge District Council and London Borough of Bromley Council

Wednesday 13 June 2018

Present: Sarah Thompson (ST) (TDC), [Gill Slater (GS), Nigel Riley (NR), Chloe Sheehan (CS) (LBB)

ST provided an update on the preparation of the Tandridge Local Plan, which included showing a map of the District and indicated those sites that would be allocated in the TDC Local Plan that would be relevant to Bromley as they are near the boundary of the areas. TDC will be publishing their Local Plan on 21st June 2018, putting it to Committee on 3rd July and subject to committee approval, running their Consultation from Monday 16th July to Tuesday 28th August 2018.

ST reported that TDC hope to meet a target around 6,150 new homes, not close to their 9,400 identified housing need, or the Government target of 12,900.

Bromley are included within the London Plan. Whilst LBB are waiting for their Inspectors Report following their recent Examination, once adopted the wider London Plan could mean LBB need to review their housing supply. The draft London Plan proposes a Bromley target for net housing completions of 1,424 units pa, significantly exceeding the current London Plan supply target for Bromley, reflected in its draft Local Plan, of 641 units pa LBB indicated that they are under pressure from landowners to re-designate open space sites for residential development and ST explained that some sites within Warlingham would require the loss of Playing Pitches, although these would be re-provided by 3G in the South Godstone Garden Community.

Other matters discussed included neighbourhood planning and the pressures for Gypsy and Traveller provision within both boroughs

No outstanding transport, business and employment policy issues were identified. TDC confirmed that the projected employment growth at Biggin Hill SOLDC is being taken into account in its infrastructure modelling.

Following receipt of LBB’s comments on the TDC Local Plan, a draft Statement of Common Ground will be circulated to LBB by TDC by the end of September 2018. It is anticipated that a final version of the Statement of Common Ground will be signed by Members on both sides in November 2018.
Present: Sarah Thompson (ST) (TDC), Nicola Walters (NW) (TDC) and Rosie Sterry (RS) (RBBC)

ST provided an update of the preparation of the Tandridge Local Plan, which included showing a map of the District, and indicated those sites that would be allocated in the TDC Local Plan that would be relevant to Reigate & Banstead as they are near the boundary of the areas. TDC will be publishing their Local Plan on 21st June 2018, putting it to Committee on 3rd July and, subject to committee approval, running their Consultation from Monday 16th July to Tuesday 28th August 2018.

ST reported that TDC hope to meet a target of around 6,150 new homes, not close to their 9,400 identified housing need, or the Government target of 12,900. Smallfield, a Tier 2 settlement close to the district boundary with RBBC, is the one most relevant to RBBC of those sites being allocated in TDC’s Local Plan. Around 300 units are proposed on a number of sites at Smallfield together with expansion of the primary school and flood mitigation measures, which includes attenuation ponds at a cost of approximately £10m. This has been assessed for feasibility jointly by TDC, the Environment Agency and Surrey CC. This should assist in alleviating flooding in RBBC from the Burstow Stream.

Whilst TDC are not safeguarding or allocating Redhill Aerodrome in the Local Plan, ST reported that TDC would be protecting employment use within Redhill Aerodrome. ST explained that this was due to the uncertainty of a new junction on the M23 that would be needed to facilitate the development. RS clarified that Redhill Aerodrome was safeguarded in their plan, RBBC were waiting for a date for their Examination where this issue would be discussed.

ST also explained that Priory Farm was allocated for employment (which with Mercer Ponds was also recognised as a tourist attraction). TDC will not be removing smaller settlements from the Green Belt as it is felt that they are not sustainable, unlike Godstone which as a Tier 2 settlement is to be removed from Green Belt.

TDC have explored all options to meet their housing needs target however 3,000 of unmet need will remain. RS confirmed that despite currently exceeding their own 460pa housing need, RBBC would be unable to meet any of TDC’s unmet need. This is based on their Core Strategy figure and not the Government’s standard methodology figure, which will have to be considered in their Local Plan review to commence next year (2019). It was noted that there were strong links between both councils and a willingness to assist where possible but equally each had other strong links and commitments with other Housing Market Areas.

The timing of the Garden Community project, the need to improve the rail infrastructure and amenities, such as 3G pitches and a health centre which will be located at the Garden Community, were discussed. Due to the Garden Community not commencing until 2026, it will continue to deliver homes post the plan period.
Present: Sarah Thompson (ST) (TDC), Nicola Walters (NW) (TDC) and Elizabeth Brigden (EB) (CBC)

ST provided an update on the preparation of Tandridge Local Plan, which included showing a map of the District, and indicated those sites that would be allocated in the TDC Local Plan that would be relevant to Crawley as they are near the boundary of the two areas. TDC will be publishing their Local Plan on 21st June 2018, putting it to Committee on 3rd July and subject to committee approval, running their Consultation from Monday 16th July to Tuesday 28th August 2018.

ST reported that TDC hope to meet a target of around 6,150 new homes, not close to their 9,400 identified housing need, or the Government target of 12,900.

Smallfield, a Tier 2 settlement close to the district boundary with CBC, is the one most relevant to CBC of those sites being allocated in TDC’s Local Plan. Around 300 units are proposed on a number of sites at Smallfield together with a one form expansion of the primary school and flood mitigation measures, which includes attenuation ponds at a cost of approximately £10m. This has been assessed for feasibility jointly by TDC, the Environment Agency and Surrey CC. EB raised the question of whether Gatwick Airport had been consulted regarding the ponds as it can affect aircraft having birds in the locality. (ST confirmed post meeting that Gatwick has been informed of the proposals and a similar case in Mid Sussex had been agreed.) It was further noted that the Garden Community would provide a new secondary school together with two primary schools and this, together with other initiatives planned with Surrey CC district wide, meant that there should be no impact on education and health facilities for Crawley.

TDC has explored all options to meet their housing needs target however 3,000 of unmet need will remain. It was noted that there were strong links between both councils and a willingness to assist where possible but equally each had other links and commitments within our Housing Market Areas.

The timing of the Garden Community project, the need to improve the rail infrastructure and what amenities, such as 3G pitches and a health centre, will be located at the Garden Community were discussed. Due to the Garden Community project not commencing until 2026, it will continue to deliver homes post the plan period. ST reported that road improvements along the A22 corridor would see most junctions improved or mitigated.

EB confirmed that Crawley, who have a plan adopted 5 years ago, were unable to meet their current housing need and have agreements with both Mid Sussex and Horsham who are helping them to meet this need. Crawley’s shortfall of approximately 300 dwellings per annum is divided between Horsham and Mid Sussex and may involve discussions with Reigate & Banstead at some point near Horley. For these reasons, Crawley is unable to assist TDC in meeting their unmet need.

ST confirmed that TDC is unable to meet its current Traveller / Showpeople needs and may look to work with Reigate & Banstead in this regard. She noted that as part of the Garden Community some
plots could be allocated to Travelling Showpeople. Crawley’s need is being safeguarded to provide for travelling communities if they choose to leave their bricks and mortar they currently reside in.

Following receipt of CBC’s comments on the TDC Local Plan, a draft Statement of Common Ground will be circulated to CBC by TDC by the end of September 2018. It is anticipated that a final version of the Statement of Common Ground will be signed by Members on both sides in November 2018.
Present: Sarah Thompson (ST) (TDC), Nicola Walters (NW) (TDC) and Julia Dawe (JD) (LBCC)

ST provided an update on the preparation of the Tandridge Local Plan, which included showing a map of the District, and indicated those sites that would be allocated in the TDC Local Plan that would be relevant to Croydon Council as they are near the boundary of the two areas. TDC will be publishing their Local Plan on 21st June 2018, putting it to Committee on 3rd July and, subject to committee approval, running their Consultation from Monday 16th July to Tuesday 28th August 2018.

ST reported that TDC hope to meet a target of 6,150 new homes, not close to their 9,400 identified housing need, or the Government target of 12,900. JD confirmed that whilst LBCC anticipate being able to meet their own housing need, as part of the London HMA they will be unable to help TDC meet any unmet need. In addition, the draft London Plan required LBCC to provide a higher number of homes than is being delivered in their recently adopted Local Plan. ST indicated that as part of the TDC SHMA the need for 3 bed family homes in the district had been identified and Croydon provide a number of 1 and 2 bedroom apartments.

Issues potentially affecting Croydon were discussed as follows:

**Education**: TDC have been liaising with Surrey CC and aim to address all additional educational requirements that result from the Local Plan. It is intended that Caterham will have an additional 2 form extension to both Secondary and Primary schools.

**Transport**: modelling has indicated little impact on Croydon from development in Caterham and Warlingham. The main issues for TDC remain Jct 6 of the M25 and the A22.

**Recreation and leisure space**: In Warlingham there will be a loss of playing fields/pitches which Sport England have agreed is acceptably offset by provision of 3G pitches in the new Garden Community. JD indicated that due to the fact Croydon has the large area of metropolitan open land (Green Belt) there will be little impact on residents by loss of pitches in Warlingham.

**Flooding**: TDC has been working with Croydon/Surrey CC and EA on Caterham flood alleviation schemes. Caterham Hill proposals for flood alleviation could be partially funded by sites / CIL monies.

**Employment**: TDC are allocating 4 strategic employment sites in the District to enable them to be protected and intensification to occur. These should have no impact on Croydon’s employment sites.

Following receipt of LBCC’s comments on the TDC Local Plan, a draft Statement of Common Ground will be circulated to LBCC by TDC by the end of September 2018. It is anticipated that a final version of the Statement of Common Ground will be signed by Members on both sides in November 2018.
Appendix B – High Level Options Appraisal for Junction 6

Introduction

This Topic Paper sets out the various options that Tandridge District Council considered for the improvement of Junction 6 of the M25. It is understood that Junction 6 is likely to reach capacity by 2020 and in order to support growth, as identified as part of the Tandridge Local Plan, mitigation will be required.

It should be noted that a number of options were submitted by various site promoters and these have been considered as potential high level options. This is not to say that the options presented have been fully appraised and costed, but instead, are intended to provide an indication as to the potential options that may be available and that should be considered as high level mitigation measures to support the Local Plan. The Local Plan could only include one mitigation measure to model to understand that the impact on this junction could be mitigated. However, further feasibility work and refinement will be required.
Option 1 RSK – Proposed Roundabout Improvement at Junction 6 of the M25 (RSK)

Option 1 predominantly uses the existing highway boundary but includes increased flare length at entrances to the gyratory together with circulatory widening of the gyratory on both sides of motorway, but not beneath the motorway itself. This partial widening makes Option 1 more cost effective than some of the alternatives and is all within highways land. However, the improvements identified in this option are focused on the flares of the roundabout and as the strategic highways model identified the issue is with the roundabout itself, this option would not resolve the capacity issue with this junction. There would not be sufficient improvement at the junction and on this basis, Option 1 has been discounted.
Option 2 – Proposed Roundabout Improvement at Junction 6 of the M25 (I – Transport)

Option 2 involves amending the existing carriageway from two lanes around the gyratory (roundabout) to three lanes the whole way around. It includes a new filter lane on the eastbound M25 offslip to allow unimpeded movement north along the A22. This option is less obtrusive on the AONB and its setting compared to some alternative options as it does not involve much additional construction and this in turn makes it more cost effective than some of the other alternatives. Option 2 has been chosen for further feasibility work on the basis of the above points and the fact that it predominantly uses the existing highway boundary.
Option 3 – Proposed Roundabout Improvement at Junction 6 of the M25 (Vision Transport)

Option 3 predominantly uses the existing highway boundary but includes increased flare length at entrances to the gyratory together with circulatory widening both sides of motorway and southbound beneath the motorway. Again as the strategic highways model identified that the issue was with the roundabout, this option, which does not include circulatory widening northbound beneath the motorway, would provide limited additional circulatory flow. On this basis, although, more cost effective than some of the alternative options, Option 3 was discounted.
Option 4 - Proposed Roundabout Improvement at Junction 6 of the M25 (Stillwell Partnership)

Option 4 includes an additional lane around the circulatory together with segregated left turn lanes. In order to accommodate both of these additions, there would be a need to purchase additional land beyond the highway boundary. Option 4 would also result in northbound entry/exit for Godstone onto the A22 but there would be no provision for southbound entry/exit, requiring it to use the A22/A25 roundabout to come back onto the A22. This option would be more intrusive in the AONB setting, would require a large uptake of additional land and would also be more expensive than some of the alternative options, which could result in it being undeliverable and on this basis has been discounted.
**Option 5 - at grade flyover (Stillwell Partnership)**

Option 5 recommends an at grade flyover for the A22 and realignment of A22 slip. It does not propose any additional circulatory space around the gyratory and there are concerns that there could be traffic weaving implications on A22/M25 clockwise slip road. Option 5 has been excluded as not only would it require additional land, it would not solve the issues with the roundabout itself, it would result in harm to the AONB, and there are also concerns about the cost of implementing this scheme, which could result in it being undeliverable.
Option 6 - at grade flyover with additional northbound freeflow (Stillwell Partnership)

Option 6 is more complex in its design, including an at grade flyover for the A22 and realignment of A22 slip roads in addition to a freeflow link from the A22 northbound onto the M25 clockwise. It does not however propose any additional circulatory space around the gyratory and there are concerns that there could be traffic weaving implications on A22/M25 clockwise slip road. Option 6 has been excluded as not only would it require additional land, it would not solve the issues with the roundabout itself, it would result in harm to the AONB, and there are also concerns about the cost of such a scheme, which could result in it being undeliverable.
**Option 7 - northbound freeflow and circulatory lane (Stillwell Partnership)**

This option includes realignment of the A22 slip roads and includes a freeflow link from the A22 northbound onto the M25 clockwise. It also proposes creating an additional circulatory lane on the gyratory. There are concerns with perceived traffic weaving implications on the M25 clockwise slip roads coupled with the fact that this scheme would require the purchase of significant land and potentially result in harm to the AONB and the costs of such a scheme, which could result in the scheme being undeliverable, have led to Option 7 being discounted.