Our Local Plan

Sustainability Appraisal
December 2015
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1. Non-technical summary

Compliance with the SEA Directive

Where this report addresses the requirements of the SEA Directive this will be explained in a box like this:

The SEA Directive requires “a non-technical summary of the information provided…”
SEA Directive Annex 1(j)

Introduction

1.1 This non-technical summary is an overview of the assessment work carried out and explains how the Sustainability Appraisal (SA) ties in with the emerging Tandridge District Local Plan as a whole.

1.2 The purpose of the SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of planning policy documents. It is a legal requirement for local authorities to carry out a SA. Under European Directive, local authorities are required to undertake a Strategic Environmental Assessment (SEA) and an 'Environmental Report' must be prepared. Both of these requirements are covered in this report by incorporating both the SA and SEA.

The Local Plan

1.3 In 2008 the Council adopted its Core Strategy which requires the delivery of 2,500 homes between 2006 and 2026. This is an average of 125 per year and was the figure required by the revoked South East Plan.

1.4 Since the adoption of the Core Strategy, the Government has introduced the National Planning Policy Framework which requires local planning authorities to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in their housing market area as far as is consistent with the policies in the Framework. Consequently the Council has commenced work on the Local Plan and the SA will be used to assess the economic, environmental and social effects of the emerging policies.

The Sustainability Appraisal Process

1.5 The SA/SEA is an iterative process that has taken place alongside the evolution of the Local Plan. There are five stages to preparing a sustainability appraisal. Table 1 below illustrates these stages alongside the Local Plan process.

<table>
<thead>
<tr>
<th>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope (Scoping Report)</th>
<th>Commence work on the production of the Tandridge District Local Plan (January to November 2015)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1 – Identify other relevant policies, plans and programmes, and sustainability objectives</td>
<td>Develop an evidence base to inform the Plan</td>
</tr>
<tr>
<td>A2 – Collect baseline information</td>
<td></td>
</tr>
<tr>
<td>A3 – Identify sustainability issues and problems</td>
<td></td>
</tr>
<tr>
<td>A4 – Develop the SA framework</td>
<td></td>
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</tbody>
</table>
A5 – Consult the consultation bodies on the scope of the SA


### Stage B: Developing and refining options and assessing effects

<table>
<thead>
<tr>
<th>Step</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>B1</td>
<td>Test Local Plan objectives against the SA framework</td>
</tr>
<tr>
<td>B2</td>
<td>Developing Local Plan options including reasonable alternatives</td>
</tr>
<tr>
<td>B3</td>
<td>Evaluate the likely effects of Local Plan and alternatives</td>
</tr>
<tr>
<td>B4</td>
<td>Consider ways of mitigating adverse effects and maximising beneficial effects</td>
</tr>
<tr>
<td>B5</td>
<td>Propose measures to monitor the significant effects of implementing Local Plan</td>
</tr>
</tbody>
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**Consultation of approaches for the Plan and then consult on this (Regulation 18) (December – February 2015/2016)**

### Stage C: Prepare the Sustainability Report

<table>
<thead>
<tr>
<th>Step</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>C1</td>
<td>Preparing the SA report</td>
</tr>
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</table>

Production of Regulation 19 Local Plan

### Stage D: Consult on the draft SA report and Local Plan

<table>
<thead>
<tr>
<th>Step</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>D1</td>
<td>Public consultation on Local Plan and the SA report</td>
</tr>
<tr>
<td>D2</td>
<td>Appraise significant changes resulting from representations</td>
</tr>
<tr>
<td>D3</td>
<td>Submit Local Plan for independent Examination</td>
</tr>
</tbody>
</table>

Consultation on proposed Plan (Regulation 19 consultation)

Submit for Examination

### Stage E: Adoption and Monitoring

<table>
<thead>
<tr>
<th>Step</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>E1</td>
<td>Prepare and publish adoption statement</td>
</tr>
<tr>
<td>E2</td>
<td>Monitor sustainability appraisal indicators</td>
</tr>
<tr>
<td>E3</td>
<td>Respond to adverse effects</td>
</tr>
</tbody>
</table>

Monitor and report on the implementation of the Tandridge District Local Plan (from adoption to 2033)

1.6 The Scoping report is available on the Council website. This details how Stage A above was completed. The conclusion of which was to produce an appraisal framework of sustainability objectives to appraise the Plan, vision, objectives and policy approaches. This SA Report relates to the processes identified in Stage B.

**This SA Report**

1.7 In this SA Report, the vision and objectives of the Tandridge District Local Plan – Issues and Approaches (Regulation 18) document were assessed against the SA Framework, as was each policy approach relating to different policy areas.

1.8 Using the SA Framework and associated questions, baseline information and professional judgement, the likely effects and impacts of the draft policy approaches on the District were considered across the range of SA Objectives. Significant effects were considered and opportunities identified to improve the overall sustainability of a policy approach. The scoring system used to assess the impact of policy approaches is identified in Table 2, overleaf.
### Table 2: Scoring Criteria

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Likely impact</th>
</tr>
</thead>
<tbody>
<tr>
<td>++</td>
<td>Major positive</td>
</tr>
<tr>
<td>+</td>
<td>Minor positive</td>
</tr>
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<td>o</td>
<td>Neutral / negligible</td>
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<tr>
<td>-</td>
<td>Minor negative</td>
</tr>
<tr>
<td>--</td>
<td>Major negative</td>
</tr>
<tr>
<td>?</td>
<td>Unsure</td>
</tr>
<tr>
<td>n/a</td>
<td>Not applicable</td>
</tr>
</tbody>
</table>

### Key findings of the SA

1.9 This SA report assesses all of the policy approaches on a range of different subject areas. Section 9 of the SA report sets out how different policy approaches were considered and the full appraisals of such approaches can be found in Appendix 3. This assessment of the policy approaches will be used to inform the development of the preferred policy approaches that will make up the next stage of the Tandridge District Local Plan.

1.10 A key policy area of the Issues and Approaches – Local Plan document that was assessed related to the scale and location of future residential and commercial development.

1.11 The Local Plan identifies seven different approaches to future development within the District. The first approach only looks at those schemes that have already been granted planning permission, therefore this is not considered to be a realistic approach as it will not provide a delivery strategy in the future. The six remaining approaches were assessed that consisted of varying levels of residential development in different locations. The assessment found that those approaches that would deliver high levels of development perform well in terms of providing sufficient housing to enable people to live in a home suitable to their needs. However, such approaches were found to perform relatively poorly against a number of the other sustainability objectives, particularly the environmental objectives. There are mitigation measures that can be implemented to reduce the negative impacts and if these approaches are taken forward as the preferred approach the site selection process will need to assess both their individual impact and the cumulative impact against the objectives.

1.12 One approach would result in the delivery of a large urban extension or new settlement. While it is considered that this will take a number of years to deliver, it was recognised that it could provide a significant level of housing in the long
term. Due to scales of economy, such a development has the potential to make some significant financial contributions to deliver the required level of infrastructure and mitigate the negative impacts of development. If this approach is selected as the preferred approach for the Local Plan, a large number of locations will need to be considered and thoroughly assessed to ensure that the most appropriate location is selected.

1.13 Approaches 2a and 2b focus development to the existing urban areas and therefore only provide a relatively low number of houses. Consequently, they have scored very poorly against the SA objectives relating to the provision of sufficient housing and growth of the economy. However, they have scored well against many of the other objectives as the approaches will focus development to well serviced areas and will protect the environment around the existing built up areas.

1.14 The appraisal of the economic approaches clearly favoured an approach that would provide the Council with the necessary tools to protect the strategic employment sites, therefore supporting local jobs, the economy and help to reduce commuting distances.

Conclusion

1.15 The appraisal process should not be seen as a finished piece of work, but only a step in the process of developing preferred policies. The appraisal also demonstrates the tensions between different policy options. For example, an option encouraging more renewable energy may conflict with the protection of the countryside. Therefore in developing preferred policies the Council and consultees will need to take a view about the weight that should be attached to a particular approach, even if it has some negative effects on certain sustainability objectives.

1.16 This report will be published for consultation between Friday 18 December and Friday 26 February 2015 and any comments submitted will be gratefully received.
2. Introduction

2.1 The Sustainability Appraisal (SA) is a mechanism for considering the impacts of a draft plan’s approaches and alternatives to that approach, in terms of key sustainability issues, with a view to avoiding and mitigating adverse impacts, maximising the positives and contributing to sustainable development.

2.2 The Council is required to appraise the sustainability of its proposed policy framework and alternatives at certain stages of development. This is done through the publication of an SA, which incorporates the key themes of the Strategic Environmental Assessment (SEA).

2.3 This SA report has been written to accompany the Tandridge District Local Plan – Issues and Approaches (Regulation 18) document and appraises the emerging spatial and policy approaches for managing development in the district until 2033.

Structure

2.4 This report is in numerous sections and consists of the non-technical summary, this introduction and the following sections:

- Section 3 provides contextual information about the Local Plan and the relationship with the SA;
- Section 4 discusses the process, purpose and legislative background of the SA;
- Section 5 explains the methodology used to carry out the appraisal;
- Section 6 discussed the Habitat Regulations Assessment and its relationship with the SA;
- Section 7 provides baseline information about the district;
- Section 8 appraises the Local Plan’s vision and objectives;
- Section 9 appraises the Local Plan’s approaches;
- Section 10 discusses monitoring of the effects of the Local Plan and SA; and
- Section 11 provides some concluding remarks.

Consultation

2.5 As required by regulations that relate to the SA, this report is published for consultation between Friday, 18th December and Friday, 26th February. Comments on this report can be sent to us by:

- Online: http://consult.tandridge.gov.uk/portal/
- Email: localplan@tandridge.gov.uk; and
- Post: Planning Policy, Tandridge District Council, Council Offices, Station Road East, RH8 0BT.

For the benefit of sustainability, the Council recommend and encourage the submission of comments using electronic methods.
2.6 An electronic version of this document can be found online at www.tandridge.gov.uk/technicalassessments. Comments made on the document after the end of the consultation period may not be accepted. This document is published as part of the consultation on the Tandridge District Local Plan – Issues and Approaches (Regulation 18) document. More information about the Local Plan can be found on our webpage www.tandridge.gov.uk/localplan.

Meeting Statutory Requirements

2.7 In order to show that the SA report is compliant with relevant requirements, we will signpost when a requirement of the SEA Directive is being met. An example of a signpost is shown below.

Compliance with the SEA Directive
Where this report addresses the requirements of the SEA Directive this will be explained in a box like this.
3. The Local Plan

Compliance with the SEA Directive
The report should include “an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans or programmes”
SEA Directive Annex 1(a)

The Core Strategy

3.1 In 2008, the Council adopted its Core Strategy to guide development in the district between 2006 and 2026. To do this, the Core Strategy consists of a number of strategic policies. This includes a requirement to provide 2,500 homes during the plan period, equivalent to 125 dwellings per year.

3.2 This housing requirement derived from a figure in the Regional Spatial Strategy for the South East, known as the South East Plan. Regional Spatial Strategies were revoked by the previous Coalition Government and therefore its housing targets can no longer be used in plan-making.

3.3 Furthermore, the Coalition Government chose to replace national policy in the form of Planning Policy Guidance Notes and Planning Policy Statements, which the Core Strategy relied upon. In its place, the National Planning Policy Framework (NPPF) and the web-based Planning Practice Guidance have been introduced.

3.4 Of particular relevance to plan-making is paragraph 47 of the NPPF, which requires local planning authorities to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in their housing market area as far as is consistent with other policies in the NPPF.

Tandridge District Local Plan

3.5 Against this background, the Council made the decision to review the Core Strategy and replace it with a Local Plan to guide development in the district between 2013 and 2033. The Council’s timetable for the production of this document is set out in the Local Development Scheme (LDS).

3.6 Whilst the Council is still at an early stage of plan-production, the Council has gathered the necessary evidence base that has enabled the Council to develop a vision for the district, the objectives of the Local Plan and a number of policy approaches that it is considering. These aspects are presented in the Tandridge District Local Plan – Issues and Approaches (Regulation 18) document.

3.7 This SA Report is written to accompany the Regulation 18 document and has appraised the vision, objectives and the policy approaches that it is considering. Figure 1, overleaf, presents the relationship between the Local Plan and SA production processes.
Produce a Scoping Figure 1: A figure showing the link between the Local Plan and SA preparation processes

**Plan making**

- Develop an evidence base to inform the Plan.
- Consider approaches for the Plan and prepare a draft
- Consult on the Reg 18
- Finalise the draft plan (Reg 19)
- Consult on the Draft Plan
- Submit the Final Plan for Examination
- Adopt the Plan & monitor implementation

**Sustainability Appraisal**

- Develop a framework for SA and an evidence base to inform it.
- Appraise the Plan approaches
- Consult on the Interim SA
- Prepare the SA Report documenting the appraisal process
- Consult on the SA Report
- Appraise any significant changes to the Plan following consultation

**We are here**
4. The Sustainability Appraisal Process

Legislative Background

Compliance with the SEA Directive
The SEA Directive requires that the report includes “the environmental protection objectives, established at international, Community or national level, which are relevant to the plan and the way that those objectives and any environmental considerations have been taken into account during its preparation.

Annex 1(e) SEA Directive

4.1 A Strategic Environmental Assessment is required by the UK’s Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations’) which transposes European Directive 2001/42/EC (known as the SEA Directive) into UK Law.

4.2. The SEA Regulations require the assessment of plans and programmes which are likely to have significant environmental effects. The objective of the SEA is: “To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans, with a view to promoting sustainable development”.

4.3 The SEA is focused primarily on environmental effects, although it does cover social and economic effects to a degree. However, the SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic.

4.4 The need for an SA is made clear in the National Planning Policy Framework (NPPF). This is explained by paragraph 165 which explains that “a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan process, and should consider all the likely significant effects on the environment, economic and social factors”.

4.5 This report therefore seeks to comply with both the requirements of Sustainability Appraisal and the Strategic Environmental Assessment and will be referred to henceforth as SA. Such a process is in accordance with the requirements of the relevant directives, regulations, national policy and guidance.

Sustainable Development

4.6 By undertaking the SA, the Council will be able to show that the Local Plan will help contribute to achieving sustainable development. There are many definitions of sustainable development. The most common and widely accepted is that adopted by the World Commission on Environment and Development in 1987:
“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.”

4.7 This World Commission resulted is an international commitment to achieving sustainable development through Resolution 24/187 of the United Nations General Assembly.

4.8 The commitment to achieving sustainable development was set out in The UK Sustainable Development Strategy 2005, *Securing the Future*. This strategy set out the following five ‘guiding principles’ to achieve sustainable development:

1. living within the planet’s environmental limits;
2. ensuring a strong, healthy and just society;
3. achieving a sustainable economy;
4. promoting good governance; and
5. using sound science responsibly.

4.9 The NPPF refers to both Resolution 24/187 of the United Nations General Assembly and the UK Sustainable Development Strategy. Paragraph 6 of the NPPF explains that “the purpose of the planning system is to contribute to the achievement of sustainable development.” Accordingly, it is clear that those producing Local Plans need to contribute to this achievement.

**Stages of the Sustainability Appraisal**

4.10 The main objectives of the SA process that will accompany and inform the Tandridge District Local Plan will be to address the following:

- Ensure that the Local Plan accounts for policies, plans and programmes on an international, national and local scale;
- Establish a baseline assessment for Tandridge District, outlining the environmental, social and economic characteristics and raising any issues that the plan will need to account for;
- Creating a sustainability framework that respects the sustainability of Tandridge;
- Testing sites and policies as part of the Local Plan against the Tandridge District sustainability framework to assess the impact of the policy approaches, including the preferred approaches;
- Ensuring that realistic and meaningful alternative approaches are tested as part of the process, reflecting on potential improvements to the Local Plan; and
- Involving the public and authorities with social, environmental and economic responsibilities as part of the assessment process.

4.11 To undertake the full SA process in relation to a Local Plan document, the Planning Practice Guidance outlines the following five stages for SA:

- Stage A Setting the context and objectives, establishing the baseline and deciding the scope;
• Stage B Developing and refining alternatives and assessing effects;
• Stage C Prepare the sustainability appraisal report;
• Stage D Seek representations in the sustainability appraisal report from consultation bodies and the public; and
• Stage E Post adoption reporting and Monitoring.

4.12 Additional details about each of the respective stages are contained in Figure 2, overleaf.
The Scoping Report identified the scope and level of detail of the information to be included in subsequent SA reports. It sets out the context, objectives and approach of the assessment; and identifies relevant environmental, economic and social issues and objectives. The scoping report was set out under the following topics:
• Biodiversity and Nature Conservation
• Population
• Health
• Soil (including land contamination)
• Water: quality, quantity and flooding
• Air quality
• Climate change
• Heritage
• Landscape and Countryside
• Waste and Recycling, and Minerals
• Amenity and Community Facilities
• Social Inclusiveness, Equal Opportunities and Access to Services
• Housing provision
• Economic development and town centres
• Land (including brownfield and greenfield land)
• Traffic and commuting and access to public transport
• Noise sources
• Crime
• Sustainable development and construction; energy consumption and efficiency

4.14 To comply with the European Directive to incorporate Strategic Environmental Assessment into the SA process, SEA topics are specifically referenced in the scoping report.

4.15 For each topic the following information was set out:

- **Key Policies, Plans, Programmes, Strategies and Initiatives (PPPSI):** A list of relevant documents from international, European, national, regional and local level (SA stage A1)
- **Relevant aims and objectives from the PPPSIs:** summary of the main objectives and sustainability issues and implications that are relevant locally (SA stage A1)
- **Baseline:** sets out quantitative and qualitative information for the local area (SA stage A2)
- **Sustainability Issues:** The main issues arising from the assessment that should be addressed through the plan making process (SA stage A3)

4.16 In reference to SA stage A4, the Scoping Report contained the SA Framework, consisting of objectives, themes and questions. This SA Framework will be used to assess the sustainability merits of aspects of the Local Plan. More information is contained in Section 5 – the Appraisal Methodology.

4.17 The Council prepared a Scoping Report and consulted on this for a five week period finishing in October 2015 with the statutory consultees (those consulted are listed at the end of this document). The responses to the consultation have been taking into account and used to update the Scoping Report.
4.18 This SA Report has been written to accompany the Tandridge District Local Plan – Issues and Approaches (Regulation 18) document. This SA Report relates to stage B of the SA process listed in Figure 2. It has:

- Tested the vision and objectives against the sustainability framework (SA stage B1);
- Assisted in the development of Local Plan approaches and assessed their likely effects (SA stage B2 and B3);
- Considered how to maximise beneficial effects and minimise negative impacts of different approaches (SA Stage B4)
- Discussed how the Council will approach monitoring (SA Stage 5)

Future Stages of the SA

4.19 The Council will continue with the stages of the SA listed in Figure 2, as the Local Plan develops, up until the point that the Local Plan is adopted.

4.20 It is recognised that this SA Report is written to accompany a version of the Local Plan, which is at an early stage of production. It may be that when further information is collected in the preparing of the Local Plan, for example from other evidence base documents or comments on consultation documents, further policy approaches are developed. In such a situation, as the SA is an iterative process, future SA Reports may also reconsider some of the processes listed in Stage B.
5. Appraisal Methodology

5.1 The SA framework used within Tandridge dates back to 2004 and was developed through a series of workshops and working groups held jointly with other Surrey local planning authorities, Surrey County Council and with the statutory environmental consultation bodies. Through this joint working an original suite of 23 sustainability objectives was established to enable the east Surrey authorities to assess their development plans by a process of ‘peer review’.

5.2 In partnership with the other East Surrey planning authorities the objectives have been revised, the SA objectives were consulted on in April 2015 and having incorporated comments received, a final version of the objectives was drawn up. The SA framework was also presented in the SA Scoping Report.

5.3 Table 3 below sets out the 16 East Surrey Sustainability Appraisal objectives, while Appendix 1 contains a list of the objectives, as well as their related NPPF theme and the decision aiding questions used to appraise aspects of the Local Plan.

<table>
<thead>
<tr>
<th></th>
<th>Objective</th>
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<tbody>
<tr>
<td>1</td>
<td>To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.</td>
</tr>
<tr>
<td>2</td>
<td>To facilitate the improved health and wellbeing of the whole population.</td>
</tr>
<tr>
<td>3</td>
<td>To conserve and enhance, archaeological, historic and cultural assets.</td>
</tr>
<tr>
<td>4</td>
<td>To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.</td>
</tr>
<tr>
<td>5</td>
<td>To make the best use of previously developed land and existing buildings.</td>
</tr>
<tr>
<td>6</td>
<td>To support economic growth which is inclusive, innovative and sustainable.</td>
</tr>
<tr>
<td>7</td>
<td>To provide for employment opportunities to meet the needs of the local economy.</td>
</tr>
<tr>
<td>8</td>
<td>To reduce greenhouse gas emissions and move to a low carbon economy.</td>
</tr>
<tr>
<td>9</td>
<td>To use natural resources prudently.</td>
</tr>
<tr>
<td>10</td>
<td>To adapt to the changing climate.</td>
</tr>
<tr>
<td>11</td>
<td>To reduce flood risk.</td>
</tr>
<tr>
<td>12</td>
<td>To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.</td>
</tr>
</tbody>
</table>
5.4 The 16 sustainability objectives have been used to assess the vision, objectives and policy approaches, of the Local Plan. The use of a suite of objectives lends itself to a matrix based assessment where each alternative or approach is "pitched" against each sustainability objective.

5.5 This approach has been successfully used by the Council for all development plans adopted since 2004 and it is therefore this established matrix approach is retained.

5.6 The intention is to assess the "big picture" and significant effects of the sustainability issues related to each option rather than be bogged down in the detail. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the approaches and the fact that they often relate to a single issue to be addressed by the plan amongst many.

5.7 To assess the 'nature of the effect' of the individual sustainability appraisal (SA) objective on approaches being assessed, a scoring system was devised through joint working with other local planning authorities in East Surrey to assess the likely effects of the policy options:

Table 4: Scoring Criteria

<table>
<thead>
<tr>
<th>Symbol</th>
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</tr>
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<td>?</td>
<td>Unsure</td>
</tr>
<tr>
<td>n/a</td>
<td>Not applicable</td>
</tr>
<tr>
<td>Nc</td>
<td>No correlation</td>
</tr>
</tbody>
</table>
5.8 The point above has been addressed through the SA matrix as being short (within the next 5 years), medium (years 5 to 10) and long (years 10 plus) term impacts. The assessment of cumulative (secondary and synergistic) effects has been identified in the commentary following the matrix. The outputs from each matrix table can then be compared to help decide the preferred approaches.

Limitations

5.9 The appraisal process is informed by the most up to date information and data available and utilise professional judgement. However, deficiencies in information do exist and it is not always possible to have sufficient information available when predicting effects at the development plan stage.

5.10 The Council has not generated approaches to cover all policy areas as the development of the plan is still in its early stages, consequently there is no appraisal for these policy areas in this report. The SA is an iterative process and the Council will continue to appraise approaches as they are developed and present these in subsequent SA documents.

5.11 Furthermore, climate change impacts are difficult to predict as they are most likely to result from cumulative impacts at a local, regional and national level. Therefore, best practice has been used as a benchmark to determine the most appropriate approach. In carrying out the appraisal professional judgement has been used alongside the most up to date information available.

Compliance with the SEA Directive
To have regard to "any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of particular environmental importance, such as Special Areas of Conservation or Special Protection Areas)"
Annex 1(e) SEA Directive

6.1 The Habitats Directive (together with the Birds Directive) forms the cornerstone of Europe's nature conservation policy. It is built around two pillars: the Natura 2000 network of protected sites and the strict system of species protection. The Directive protects over 1,000 animals and plant species and over 200 "habitat types" (e.g. special types of forests, meadows, wetlands, etc.), which are of European importance.

6.2 The requirements of the Habitats Directive have been transposed into British law by the Conservation of Habitats and Species Regulations 2010 (normally referred to as Habitats Regulations). Of particular relevance to plan-making is Paragraph 102 that requires authorities to assess the implications of their land use plans on sites designated under the Habitats or Birds Directives.

Habitat Regulations Assessment

6.3 The process for assessing the implications of land use plans is similar to the SA process and is commonly known as the Habitats Regulation Assessment (HRA). The first stage of the HRA process, the Screening Assessment, has been undertaken to accompany the Tandridge District Local Plan – Issues and Approaches (Regulation 18) document.

6.4 Natural England advise that HRAs should consider all sites designated under the Habitats or Birds Directive that lie within 15km of the district’s borders. As such, the impacts of the Local Plan on the following sites have been assessed in the Screening Assessment:

- Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC); and
- The Mole Gap to Reigate Escarpment SAC.

6.5 The Screening Assessment was able to determine that there would be no likely significant effect on most aspects that could affect the integrity of the above sites. However, the Screening Assessment found that it was not possible to determine that the Local Plan would not have a likely significant effect on the protected sites due to it causing:

- Significant increase air pollution at the Mole Gap to Reigate Escarpment SAC;
- Significant increase in recreational disturbance at the Mole Gap to Reigate Escarpment SAC, affecting the chalk grassland; and
- Significant increase in recreational disturbance at the Ashdown Forest SPA, affecting the ground nesting birds.
6.6 As such, the above issues will be considered in subsequent parts of the HRA process that will be carried out at the Local Plan progresses. The findings of any HRA work will be taken into account when appraising relevant policy approaches through the SA process. The HRA is available to view on the Council website.
7. Sustainability Characteristics of the District

Compliance with the SEA Directive
The report should include “the relevant aspect of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” & “the environmental characteristics of areas likely to be significantly affected”
Annex 1(b) and (c) SEA Directive

Introduction

7.1 Baseline information on the district is set out in the Scoping Report and is not replicated in its entirety in this document. A summary profile is set out below and has been updated wherever appropriate. For reference the scoping report can be viewed on the council’s website.

Summary of the sustainability issues of the district

7.2 Tandridge is a predominantly rural district covering an area of 248km². There are three main built up areas: Caterham; Warlingham/Whyteleafe in the north and Oxted/Hurst Green/Limpsfield just south of the M25 motorway. There are two larger rural settlements (that are excluded from the Green Belt) Lingfield in the south-east and Smallfield in the south-west. There are also a number of villages and some other smaller settlements and areas of sporadic development in the Green Belt. The central part of Woldingham is also excluded from the Green Belt and forms a “detached” built up area. About 94% of the area is Green Belt.

7.3 There are two Areas of Outstanding Natural Beauty (AONB), the Surrey Hills AONB in the north covers 2,973ha and the High Weald AONB in the south-east covering 1,016ha in Tandridge. AONBs are landscapes of national importance.

7.4 The total population in 2011 was 82,998¹. Since 2001, the number of households has grown by 5.4% whereas the population growth has been lower at 4.7%. The largest increase in households has been in 1 person households with an extremely large increase of 26%. Over the next twenty years it is predicted there will be a decline in the number of children and a significant decline in the number of people in the 25-44 age group (-29%) and an increase in the number of people above retirement age (50%) as the current 45-64 age group gets older.

7.5 Within Tandridge the average house price has almost doubled between 2001 and 2014 to £428,000 which is significantly higher than the national average of £264,000. It is also important to consider house prices at the lower, more accessible end of the market, the lower quartile house prices are a useful indicator of entry level property prices and in 2014 this was £249,950. When the ratio with average wages is considered, the lack of affordability is demonstrated. Tandridge is evidently considerably less affordable than the

¹ Census 2011 (all usual residents)
national average, with the lower quartile house price almost 14 times the lower quartile income for people working in the district.

7.6 The Strategic Housing Market Assessment (SHMA) has identified a need for 470 dwellings per year between 2013 and 2033.

7.7 An analysis of the Council’s housing register suggests that there is a sizable current gross need for affordable housing in Tandridge, with 1,050 households currently in need of an affordable property.

7.8 74% of the Tandridge population is economically active, with 68% either in employment or self-employed. The proportion of the workforce who are self-employed (14%) is higher than the Surrey or Countrywide average.

7.9 8,969 people live and work in Tandridge, with this representing 28% of all employed residents in the district. Evidently, this implies that a high proportion of residents commute out of Tandridge to work (72%), with a flow of around 3,500 commuters to Reigate and Banstead. There is also an important relationship with Greater London, with a total of 12,478 residents commuting to work in the capital.

7.10 Although Tandridge is situated within the economic powerhouse of the South East and specifically Surrey, across a number of key measures it is performing poorly in relation to other Surrey Districts & Boroughs (D&Bs). Within the key GVA (Gross Value Added) indicator Tandridge is the second lowest across all local authorities within both Coast to Capital and Enterprise M3 Local Enterprise Partnership areas (out of twenty nine in total).

7.11 Within the most recent (2013) UK Competitiveness Index Tandridge has the lowest ranking of all Surrey D&B’s and the biggest ranking decline against the 2010 competitiveness index. Tandridge has lost many core businesses and major employers since the mid-1990’s. The current top-50 sites by rateable value reveals very few commercial businesses outside core retail, leisure and non-commercial. Tandridge has the second lowest business birth rate in Surrey according to 2012 ONS statistics and according to new data based on new business bank accounts ranks 268 out of 326 areas surveyed in early 2014. However against a rapidly improving position across both region and county, Tandridge also has a relatively low unemployment (JSA claimant) rate, and an improving rate within the 16-24 age-range.

7.12 Caterham Valley and Oxted are the main shopping destinations within the District, and these two centres are similar in size in terms of number of shop units and the amount of retail sales floorspace. They provide a reasonable range of shops and facilities that serve their settlements and nearby villages. They have a critical mass of convenience and comparison shopping floorspace and a good range of non-retail services. There are also a number of other local centres across the district that include a small range of shops of a local nature, serving a smaller catchment.
7.13 The district also contains a large number of environmental designations, many of international and national importance in the district include:

**Heritage**
- 19 conservation areas;
- 594 listed buildings, 20 being Grade 1;
- 2 historic parks and gardens; and
- 20 scheduled monuments and 200 areas of high archaeological potential.

**Environment**
- 9 sites of special scientific interest;
- 91 sites of nature conservation importance (SNCI);
- 2 regionally important geological sites;
- 167 potential SNCIs;
- 9 local nature reserves and nature reserves owned or managed by Surrey Wildlife Trust;

7.14 Allied to the district’s heritage and environmental assets, the district is home to a number of green infrastructure assets that include:

- National cycle network routes;
- Long distance walking trails and rights of way network;
- Existing network of greenspace, parks, gardens and allotments; and
- Existing sports and play facilities.

7.15 Air quality in Tandridge is within national limits, consequently there are no Air Quality Management Areas (AQMA’s) in the District, however road traffic may create some pollution so monitoring stations are deployed around the District to monitor trends where main roads run through residential areas.

7.16 Climate change is a global concern and with impacts which are also global in scope. Warmer and wetter winters, hotter and drier summers, and more severe weather are predicted with the greatest relative change likely to be in the south and east of the UK. The potential effects of this affecting the District may include:

- Biodiversity: changing conditions may favour some species but harm others;
- Housing and Buildings: potentially less heating demand but increased cooling requirements;
- Land Use: problems caused by flooding, erosion and drought, with changing patterns of crop suitability and land use;
- Transport: disruption to road and rail services from flooding and temperature changes;
- Health: potential increase in heat-related deaths, but a possible decrease in excess winter deaths related to cold. Sources of disease such as bacteria and pests may thrive in warmer conditions and lead to new or exacerbated health problems.
What will the situation be without the Local Plan?

7.17 Without a new plan in place existing trends are expected to continue in an unplanned way. This includes the following:
- continued rise in overall population;
- further increase in elderly population and drop in younger population age bands;
- continued house price growth and related lack of affordability;
- rising numbers on the housing register;
- a maintenance of the district’s poor economic performance and loss of employment areas;
- address the cumulative impact of development on infrastructure;
- continued out-commuting;
- further densification of the urban areas; and
- the district will continue to be home to multiple environmental assets.

Key Sustainability Issues, Problems and Opportunities

Compliance with the SEA Directive

The report should include “an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans or programmes”

SEA Directive Annex 1(a)

7.18 The analysis of the Plans Policies Programmes and Strategies (PPPS) and the baseline data in the SA Scoping Report identifies the sustainability issues, problems and opportunities facing the district. The key issues are set out below, however, it should be noted that development proposals within the emerging Local Plan may highlight new issues associated with the level of development.

7.19 Catering for population growth and its associated social, economic and environmental consequences. Population increases are likely to place additional pressure on housing stock, prices and availability. The following areas need to be carefully considered:
- The level of housing delivery;
- Housing affordability (this is expected to decline); and
- Housing need (including market and affordable housing).

7.20 The population in Tandridge is living longer, therefore, the age structure of the district will require continued monitoring as age shifts will have long term implications for health care needs, housing mix and other social services. Consideration needs to be given to:
- Demographics and its consequent effects (e.g. increase of population likely to need care).

Although Tandridge is situated within the economic powerhouse of the South East and specifically Surrey, across a number of key measures the economy is performing poorly in relation to other Surrey Districts & Boroughs. Within the
key GVA (Gross Value Added) indicator Tandridge is the second lowest across all local authorities within both Coast to Capital and Enterprise M3 Local Enterprise Partnership areas (out of twenty nine in total). The SA will need to consider the economic performance of the district and the number of employees in the District.
8. Appraisal of the Local Plan Vision and Objectives

Compliance with the SEA Directive
The report should include “an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans or programmes”
SEA Directive Annex 1(a)

Local Plan Objectives

8.1 The Local Plan – Issues and Approaches (Regulation 18) document sets out a number of objectives which outline the measures the council will encourage to help achieve the strategic vision for the district. The objectives are listed in Table 5, below:

Table 5: Local Plan Objectives

<table>
<thead>
<tr>
<th>Economy and Tourism</th>
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<td>1</td>
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<th>Housing</th>
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<th>Town Centres / Retail and Leisure</th>
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<th>Health and Wellbeing</th>
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<th>Design and Safety / Climate Change</th>
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<td>11</td>
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</tbody>
</table>
Natural Environment / Heritage

Maintain and enhance our mixed and diverse natural and historic environment, mitigating and discouraging negative use.

Flooding

Ensure that any areas prone to flooding are suitably responded to and minimised where possible, and that development minimises and mitigates flood risk in the district, incorporating Sustainable Urban Drainage Systems (SUDS) where possible.

Infrastructure

Support and encourage the use of sustainable modes of transport; considering the economic impact this may have on the district.

Work with partners and service providers to maximise funding that will assist in the delivery and improve accessibility of infrastructure, services and facilities necessary for the district.

8.2 The vision and objectives of the plan have been assessed against the SA framework to ensure consistency and that all key sustainability areas identified in the scoping report has been followed through in the plan. This assessment found that the majority of the Local Plan objectives would produce positive effects or would be neutral against SA objectives.

8.3 An appraisal of the SA objectives is also set in appendix 2. Overall, the objectives provide a strong framework to support and encourage sustainable development in Tandridge. However, recommendations are included which would further improve the sustainability of the plan’s objectives. For example it is recommended that plan objective five could be strengthened to recognise the need to provide a sufficient supply of housing as identified in the Strategic Housing Needs Assessment and objective seven should note the importance of providing retail and leisure facilities across the whole of the district and not just focus them into the town centres.

The Vision

8.4 The vision will be delivered by the Objectives and provides a look into the future as to what the people and place of Tandridge will be like. A range of words were discussed at the Local Plan Steering Group (LPSG) on 25 September 2015 and turned into the vision that is set out below, this was subsequently taken back to LPSG on 15 October for members to agree.

**A vision for the people and place of Tandridge District**

The people of Tandridge will enjoy a high quality of life in a friendly and caring community. Homes, jobs and leisure facilities will be available, accessible and offer security and comfort to a mixture of people in terms of age, household and culture.

Our District will be a place with green and open spaces to support the health and wellbeing of the community.
Our successful towns and local centres will be accessible and provide for the needs of residents, businesses and visitors. Places of work and the economy will be prosperous and vibrant.

On recognition of our work with partners, the road network will be improved and the use of sustainable public transport encouraged lessening congestion.

Design will have played a key role in ensuring the District remains pleasant, safe and secure, making the most of historic assets and regenerating areas for the benefit of all.

8.5 The appraisal of the vision is set out in Appendix 2 of this report, the SA concluded that as the vision seeks to enhance the quality of life for individuals and communities it produces a positive effect across a range of SA objectives.

8.6 Sustainability could be improved further if reference to a number of the other Sustainability Objectives was made, such as reducing flood risk, adapting to the changing climate, and to conserve and enhance biodiversity.
9. Consideration of Local Plan Approaches

**Compliance with the SEA Directive**

The report should include “an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans or programmes” and;

The report should include “the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.”

**SEA Directive Annex 1(a) and (f)**

9.1 In preparing the Tandridge District Local Plan, alternative approaches have been identified and appraised as part of this iterative SA process. In assessing the various approaches the likely effects have been considered and are set out in the commentary for each approach. The appraisals are set out in Appendix 3 and the key findings are summarised below.

**Delivery Strategy Approaches**

**Approach 2a**

Residential: Approach 1 + sites within the inset areas in the district (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Woldingham).

Commercial: Intensification of existing employment sites within the inset areas.

**Approach 2b**

Residential: Approach 1 + sites within the existing inset areas in the district built at a higher density (70dph).

Commercial: Intensification of existing employment sites within the inset areas.

**Approach 3**

Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the main urban settlements and semi-rural service settlements (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Godstone).

Commercial: Intensification of all employment sites within the district.

**Approach 4**

Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the rural settlements (Bletchingley, Woldingham, South Nutfield,
Dormansland, South Godstone, Tatsfield, Blindley Heath, , Felbridge and Old Oxted).

Commercial: Intensification of all employment sites within the district.

**Approach 5**

Residential: Approach 1 + Approach 2a + Approach 3 + Approach 4 (this scenario is based on maximum capacity).

Commercial: Intensification of all employment sites within the district.

**Approach 6**

A large urban extension or new settlement.

The amount of homes and employment space to be provided in this approach are to be determined as the plan progresses. This approach is known as a 'broad location' in the NPPF.

**Delivery Strategy Approaches Appraisal Summary**

9.2 Approaches 3 and 5 perform well in terms of providing sufficient housing to enable people to live in a home suitable to their needs, however, this level of development does mean that they score relatively poorly against a number of the other sustainability objectives. There are mitigation measures that can be implemented to reduce these impacts and if either of these approaches is taken forward as the preferred approach the site selection process will need to assess, both, their individual impact and the cumulative impact.

9.3 Compared to the objectively assessed housing need number, approach 4 will deliver a relatively low number of dwellings so scores poorly against the provision of housing and due to the rural nature of the sites it has also scores poorly against other key sustainability objectives such as reducing the need to travel, improving noise and light pollution, enhancing the landscape character and enhancing biodiversity.

9.4 Approach 6 will see the delivery of a large scale development and while it is considered that this will take a number of years to deliver it could provide a significant level of housing in the long term. Due to scales of economy such a development has the potential to make some significant financial contributions to deliver the required level of infrastructure and mitigate against the negative impacts of the development. If this approach is selected as the preferred option a large number of locations will need to be considered and thoroughly assessed to ensure that the most appropriate location is selected.

9.5 Although approaches 2a and 2b have scored very poorly against the SA objectives; provision of sufficient housing and growth of the economy, they have scored well against many of the other objectives as the approaches will seek to protect the environment around the existing built up areas.
Economic and Tourism Policy Approaches
A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance
B. Retain Core Strategy Policy 22 – The Economy
C. Identify and protect key employment sites and intensify existing sites within the district. This would consider implementing Article 4 Directions to remove permitted development rights and adding conditions to planning permissions to restrict the use of permitted development rights, where this can be justified.
D. Include a policy to support the development of tourism in the district.

Economic and Tourism Policy Approaches Appraisal Summary
9.6 Approaches A and B will allow for the conversion of buildings to alternative uses, allowing them to make the best use of previously developed land, however, without control of their release many employment uses will be lost to residential development. Approach C scores particularly well against SA objectives 6 and 7 as it will provide the Council with the necessary tools to protect the strategic employment sites, therefore supporting local jobs, the economy and help to reduce commuting distances.

9.7 It is not considered that approach D alone could sufficiently cover this topic area; therefore, it will need to be used in conjunction with, A, B, or C.

Town Centres/Retail and Leisure Policy Approaches
A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance
B. Retain Core Strategy Policy 23 - Town and other Centres
C. Amend Core Strategy Policy 23 - Town and other Centres, reflecting the recommendations of the Tandridge Retail and Leisure Study and incorporating the emerging Caterham Town Centre Masterplan into the policy.

Town Centres/Retail and Leisure Policy Approaches Appraisal Summary
9.8 All the approaches seek to maintain the existing role of the centres and provide opportunities for new services and facilities, however approach A scores poorly against a number of the SA objectives, largely due to the lack of certainty that this option provides for investors.

9.9 Approach B scores well against the SA objectives and C scores slightly better against some of the objectives as the possible adoption of the Caterham Town Centre Masterplan will help to create a vibrant sustainable place that will attract a number of different investors to deliver the plan.

9.10 It is recommended that whichever of the policies is taken forward it includes a requirement to improve public transport and accessibility for pedestrians and cyclists to help mitigate against the increased level of traffic generation.
Health and Wellbeing Policy Approaches
A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance
B. Retain Core Strategy Policy 13 – Community, Sport and Recreation Facilities and Services.
C. To prepare a policy based on recommendations contained within the Open Space Assessment.

Health and Wellbeing Policy Approaches Appraisal Summary
9.11 Management of open space and woodlands will protect and enhance natural historic environments and the setting of the built historic environments. The provision of local open space will make it accessible to all and reduce the need to travel elsewhere, therefore decreasing the amount of greenhouse gas emissions released from car journeys. The provision of further open space may create additional jobs in the leisure sector. Open space will protect the landscape and biodiversity, there is also be the opportunity to create some dual use open space that will also offer some flood protection measures.

9.12 All of the approaches will help to protect and where possible increase the amount of open space within the district, however, it is considered that the more prescriptive approach taken in C will add certainty and ensure that an adequate level of open space is provided across the district.

Design and Safety Policy Approaches
C. Prepare a more prescriptive policy design and safety planning policy
D. Recognise and defer local design policies to Neighbourhood Plans

Design and Safety Policy Approaches Appraisal Summary
9.13 All of the approaches are seeking a high quality of design, however, it is considered that approaches B and C have the potential to most effectively respect and respond to the local area.

9.14 The provision of good design in development can have positive impacts on health and well-being. Well designed places can help encourage social interaction, access to local services and promote a safe environment. Good design can have positive impacts on landscape character by ensuring that development responds positively to the local character of the area. Whichever approach is chosen the policy should place an emphasis on sustainable construction and promote recycling facilities within developments such as community composting and outside storage for recyclable goods.

Environmental Design Policy Approaches
B. Rely solely on Building Regulations in respect of access and water, and an optional nationally described space standard.
C. Seek to require optional standards above Building Regulations.
E. Allocate specific sites for large scale energy generation.

*Environmental Design Policy Approaches Appraisal Summary*

9.15 All of the approaches have scored well as they seek to improve the environmental performance of future buildings. Approach D scores particularly well as it requires a reduction in CO₂ emissions above those required by building regulations. Approach C also scores well, however, it may initially impact on the viability of delivering housing in the short term, but, this could be overcome and in the longer term it will reduce running costs for the resident.

9.16 The reduction of greenhouse gas emissions is a global issue but taking a broad view of these different policy approaches they will help to mitigate against the changing climate to varying degrees. It is not considered that any of the approaches will have any detrimental significant impacts, however, if any sites are allocated for large scale energy generation their impact on the landscape needs to be carefully considered.

*Landscape Policy Approaches*

B. Retain Core Strategy Policy 20 - Areas of Outstanding Natural Beauty and Policy 21 - Landscape and Countryside
C. Amend Core Strategy Policy 20 - Areas of Outstanding Natural Beauty (AONB) to remove reference to the Area of Great Landscape Value and replace with Surrey AONB candidate areas
D. Prepare more prescriptive policies, which designates local landscape character area and includes reference to AONB Management Plans.

*Landscape Policy Approaches Appraisal Summary*

9.17 The area where the AONB is located close to the built up area and established settlements is limited so its protection should not significantly impact on the delivery of housing or other development. Approach B and D look to protect legitimate areas in addition to the AONB and across the District. This could include large areas of the District and consideration of the current evidence, including the Surrey Landscape Character Assessment and further work will need to be done to assess the landscape to ensure that those of high intrinsic value will be protected and taken into account when considering future development.

9.18 The conservation and enhancement of the landscape will help to increase tourism to the District and there may also be the opportunity for rural jobs. Protection of landscape also contributes to the protection of water quality and safeguarding soil quality. However, landscape designation might prevent some forms of renewable energy production taking place within the District if it results
in prohibitive policies for the benefit of the landscape and could limit the locations where renewables could be sited.

**Biodiversity and Geodiversity Policy Approaches**


B. Retain Core Strategy Policy 17 – Biodiversity

C. Prepare prescriptive policies, identifying in detail the Council’s approach to different types of biodiversity and geodiversity assets

**Biodiversity and Geodiversity Policy Approaches Appraisal Summary**

9.19 The protection and identification of new areas may restrict housing development in the long term, the same could also be said for the supply of employment land, however, the Economic Needs Assessment is looking to make the best use of existing sites rather than the allocation of new sites. In addition to the designated biodiversity assets, back garden land and brownfield sites can also be very valuable, it is therefore important that the policy makes reference to this to offer them the necessary protection, where appropriate.

9.20 Heritage assets can make a significant contribution to biodiversity for species such as bats, owls and plant life. There is no mention of heritage assets within the policy and this could be included to acknowledge this positive impact.

9.21 The protection and enhancement of biodiversity will enrich the local environment, make them more accessible, act as a green lung when delivered in an urban area and contribute to our well-being.

9.22 All of the approaches offer protection to biodiversity within the District and relate to ‘green areas’ in the natural environment, however, approach C offers the opportunity to recognise the contribution that the built environment can make to biodiversity in terms of protecting, enhancing and supporting species of flora and fauna.

**Heritage Policy Approaches**


B. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance and commit to a review of Conservation Areas

C. Develop a specific heritage policy but not commit to a review of Conservation Areas

D. Develop a specific heritage policy and commit to a review of Conservation Areas

**Heritage Policy Approaches Appraisal Summary**

9.23 All of the approaches score well against the SA objectives as they provide a positive strategy for the conservation and enjoyment of the historic environment.

9.24 The conservation and enhancement of historic buildings brings benefits to community vitality in terms of maintaining our cultural heritage. However, there
could be instances where this could hinder the redevelopment of a building for alternative uses and this may in turn lead to the building or asset becoming vacant. There could also be restrictions imposed on the historic environment that could limit the quantum of development.

9.25 Approaches C and D gives the opportunity for the policy to clearly set out the importance of heritage assets and how they can add to local distinctiveness and to sense of place, in turn bringing positive effects for the community. A review of the conservation areas, which is required in approaches B and D, will have a positive impact, however, due to the time it will take to carry out this work it is anticipated that this will occur in the medium to long term.

**Green Belt Policy Approaches**
B. Reiterate national policy and set out that infill development within Green Belt Settlements would be supported.

**Green Belt Policy Approaches Appraisal Summary**
9.26 The NPPF approach to Green Belt policy only allows for development to take place in very special circumstances which is a constraint to the delivery of housing. However the NPPF does allow for the review of Green Belt boundaries through the Local Plan process in exceptional circumstances, this could include the need to promote sustainable patterns of development.

9.27 The Green Belt policy will assist in the protection of open space within the countryside, therefore, having a positive impact on the protection and enhancement of the landscape and biodiversity. However, the Green Belt designation can provide a constraint to some forms of renewable energy and low carbon technologies being installed.

**Aviation Policy Approaches**
B. Retain Core Strategy Policy 16 – Aviation
C. Amend the wording in Core Strategy Policy 16 - Aviation to recognise individual activities at airports in relation to land use within Tandridge.
D. Keep liaising with Gatwick and Biggin Hill as well as with adjoining local authorities on the approach to Gatwick and a potential second runway, and the expansion at Biggin Hill. The Council could safeguard land for whether Gatwick came forward, however, an appropriate location for this is unknown at this moment in time. The Council could suggest that the Local Plan is reviewed in 5 years following adoption to take account of Gatwick and Biggin Hill.

**Aviation Policy Approaches Appraisal Summary**
9.28 There is a large degree of uncertainty in assessing these policy approaches as it is not known how Gatwick or Biggin Hill airports will develop in the future. The current approach achieves the best results against the environmental
objectives as it aims to minimise the impact of the airports and oppose any expansion beyond the agreed limits, however, as the legal agreement that restricts a second runway at Gatwick expires in 2019 it is uncertain how this policy would perform in the longer term, particularly as the Government has delayed its decision on airport expansion in the south east of England. The other approaches may have a positive impact on the economy if the expansion of the airports are supported, however there could be some significant detrimental environmental impacts, therefore if any of these approaches are pursued they will need to carefully consider appropriate mitigation measures.
10. Monitoring requirements

_Compliance with the SEA Directive_

The report should include “a description of the measures envisaged concerning monitoring…”

SEA Directive Annex 1(a)

10.1 Monitoring is a key part of the plan process and assists in judging the success of the plan, in terms of delivering the plan’s vision and objectives and achieving sustainable development in the district.

10.2 The Council will produce a monitoring framework, to sit alongside the Local Plan and SA, in order to measure the impact of the plan’s policies on the district against environmental, economic and social factors and any targets stipulated in the Local Plan.

10.3 When the Local Plan is adopted, the results of the monitoring will be displayed annually in the Council’s Authority Monitoring Report (AMR). Should it be concluded from monitoring that the Local Plan is causing significant negative impacts or predicted targets are not being met, it may necessitate a review of relevant policies.
11. Conclusion

11.1 The appraisal process should not be seen as a finished piece of work, but only a step in the process of developing preferred policies. The appraisal also demonstrates the tensions between different policy approaches. For example an option encouraging more renewable energy may conflict with the protection of the countryside. Therefore in developing preferred policies the Council and consultees will need to take a view about the weight that should be attached to a particular approach, even if it has some negative effects on certain sustainability objectives.

11.2 This report will be published for consultation between Friday 18 December and Friday 26 February 2015 and any comments that you may have on this document will be gratefully received during this period.
Appendix 1 - The SA Objectives

Through a process of peer review the East Surrey authorities have been effectively carrying out sustainability appraisals of their emerging plans since 2004 and it has been agreed amongst the authorities that this approach will continue.

Following the adoption of the NPPF the East Surrey authorities considered it appropriate to refine the SA Objectives to make sure that the core principles of the Framework are incorporated. The revised SA objectives were consulted on in April 2015 and having incorporated comments received, a final version of the objectives that will be used across East Surrey is set out in Table 6, below:

Table 6: Table showing SA Objectives, NPPF Theme and Decision aiding Questions

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<thead>
<tr>
<th>Objective</th>
<th>NPPF theme</th>
<th>Decision aiding Questions</th>
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<tr>
<td>1 To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.</td>
<td><strong>Social</strong> – the objective accords with the NPPF theme by providing the supply of housing required to meet the needs of present and future generations. <strong>Economic</strong> – the construction industry plays a significant economic and employment role within the area, therefore the objective will contribute to building a strong economy. High quality residential areas also create attractive areas for businesses to locate to.</td>
<td>• Will the option boost the supply of housing? • Promote improvements in the availability and quality of the housing stock? • Will the option help provide a supply of affordable homes to meet identified needs? • Will the option help to reduce the number of homeless in the District? • Will the option increase the amount of extra-care or enhanced sheltered accommodation? • Will the option have a significant detrimental effect on the financial viability of delivering future housing?</td>
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|   | To facilitate the improved health and wellbeing of the whole population. | **Social** – the objective will assist in supporting strong, vibrant, inclusive, safe and healthy communities. | ▪ Will the option help to improve the health of the community?  
▪ Will the option improve access to health provision?  
▪ Will the option encourage healthy lifestyles?  
▪ Will the option enhance access to natural urban greenspace?  
▪ Will the option help people to remain independent and provide assistance to single parents, the elderly, those with ill health or disability?  
▪ Will the option reduce crime and fear of crime?  
▪ Will the option help overcome social exclusion?  
▪ Will the option help address the issues of deprivation and poverty? |
|---|---|---|---|
| 2 | To conserve and enhance, archaeological, historic and cultural assets. | **Economic** – the protection of historic and cultural assets will support the tourism economy and create attractive areas for businesses to locate to.  
**Social** – within the respective areas the objective will maintain a high quality built environment. | ▪ Will the option enhance the historic and cultural assets?  
▪ Will the option continue to protect and/or enhance cultural assets?  
▪ Will it protect Registered Parks and Gardens?  
▪ Will it preserve or enhance the character or appearance of conservation areas and their setting?  
▪ Will it conserve important heritage assets buildings and townscapes?  
▪ Will the option improve access to the authority’s cultural assets?  
▪ Will the option promote sensitive re-use of important buildings, where appropriate? |
| 3 | To reduce the need to travel, encourage sustainable transport options and improve | **Economic** – an inadequate transport system will have significant detrimental effects on the economy, therefore, this objective will ensure that the | ▪ Will the option reduce the need to travel, especially by private motorised vehicles?  
▪ Will the option provide charging infrastructure for electric vehicles? |
| **accessibility to all services and facilities.** | **required transport infrastructure is provided to assist in the building of a strong, responsive and competitive economy.** | **Social** – the objective will help create accessible local services.  
**Environmental** – sustainable transport will mitigate climate change and assist with the move to a low carbon economy. | - Will the option reduce congestion or minimise unavoidable increases in congestion?  
- Will the option reduce the need for car ownership?  
- Will the option help provide walking/cycling/public transport infrastructure, including choice and interchange?  
- Will the option be accommodated within the existing public transport constraints?  
- Will the option reduce the need for road freight?  
- Will the option improve access to the countryside and historic environments?  
- Will the option improve access to key services (education, employment, recreation, health, community services, cultural assets)?  
- Will the option enhance access to natural urban greenspace?  
- Will the option provide safe pedestrian and cycle routes?  
- Will the option improve the provision of affordable transport? |

| 5 | **To make the best use of previously developed land and existing buildings.** | **Economic** – policies enabling the use of previously developed land will ensure that a responsive approach to land use is available.  
**Social** – the use of previously developed land for residential development will provide a significant supply of housing to help meet the needs of present and future generations. | - Will the option encourage reusing PDL provided it is not of high environmental value?  
- Will the option encourage the re-use of existing buildings?  
- Will the option ensure that development is making the best use of land? |
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<th>To support economic growth which is inclusive, innovative and sustainable.</th>
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<td>6</td>
<td><strong>Environmental</strong> – the decision aiding questions for this objective will ensure that PDL will be reused provided that it is not of high environmental value.</td>
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<td><strong>Economic</strong> – the objective will contribute to building a strong, responsive, innovative and competitive economy.</td>
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<td><strong>Social</strong> – a strong economy that keeps unemployment levels low will help support strong, vibrant and healthy communities.</td>
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<td><strong>Environmental</strong> – the support of innovative technologies will assist in the move to a low carbon economy.</td>
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<td>• Will the option support sustainable growth and encourage the provision of a range of jobs that are accessible to residents?</td>
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<td>• Will the option provide for the needs of businesses?</td>
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<td>• Will the option provide for new or emerging sectors?</td>
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<td>• Will the option facilitate flexible working practices?</td>
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<td>• Will the option support the clusters or network of knowledge driven, creative or high technology industries?</td>
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<td>• Will the option increase the likelihood of local jobs being filled by local people?</td>
</tr>
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<td>• Will the option promote the viability, vitality and competitiveness of town centres and encourage their commercial renewal?</td>
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<td></td>
<td>• Will the option facilitate and encourage the building of a skilled local workforce?</td>
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<td>• Will the option encourage mixed-use development?</td>
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<th>To provide for employment opportunities to meet the needs of the local economy.</th>
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<td>7</td>
<td><strong>Economic</strong> – the objective will contribute to building a strong, responsive and competitive local economy.</td>
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<td>• Will the option provide for the needs of the economy, especially local business?</td>
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<td></td>
<td>• Will the option encourage diversity and quality of employment?</td>
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<td>• Will the option encourage rural diversification?</td>
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</table>
|   | • Will the option provide for the needs of business in urban and rural areas (such as range of premises, land, infrastructure and services)?
|   | 8 | To reduce greenhouse gas emissions and move to a low carbon economy. | **Social** – a local economy will support strong, vibrant and healthy communities.  
**Environmental** – promoting the local economy will reduce the need to travel and therefore mitigate against climate change. | ▪ Will the option have a significant detrimental effect on the financial viability of delivery of future employment development? |
|---|---|---|---|
|   | 9 | To use natural resources prudently. | **Environmental** – the prudent use of natural resources will greatly assist in the protection of the environment.  
**Social** - prudent use of natural resources supports long term | ▪ Will the option encourage the use and supply of sustainable local products or services?  
▪ Will the option help reduce the environmental impacts of products and services?  
▪ Will the option reduce the use of primary resources, or create markets for recycled materials? |
| 10 | To adapt to the changing climate. | **Economic** – the provision of adequate climate change resilient infrastructure will help to protect and future proof businesses within the area.  
**Social** – adapting to climate change will help to maintain a healthy community.  
**Environmental** – protection of the environment plays a key role in the area adapting to climate change. | - Will the option help in protecting the community from the increased extremes of weather, which are projected to occur more often with climate change (heat waves, drought and flooding)?  
- Will the option reduce the opportunity to adapt in the future? |
| 11 | To reduce flood risk. | **Economic** – the objective will promote the provision of flood defence infrastructure and help to | - Will the option reduce the risk of fluvial, surface water, groundwater and sewer flooding to existing and future development? |
| 12 | To improve the water quality of rivers and groundwater, and maintain an adequate supply of water. | make local businesses resilient to flood events.  
**Social** – flooding can have a significant impact on the health and well-being of a community.  
**Environmental** – flood resilience will ensure that communities are able to adapt to climate change. | - Will the option keep development away from areas at risk to flooding?  
- Will the option reduce the risk of flooding to adjacent development?  
- Will the option help to reduce the rate of run-off?  
- Will the option encourage Sustainable Urban Drainage Schemes?  
- Will the option ensure that increased flooding extremes can be withstood?  
- Will the option improve quality and maintain an adequate supply of water?  
- Will the option reduce pollution of groundwater, watercourses and rivers from run-off/point-sources?  
- Will the amount of nitrates/phosphates entering the water environment be reduced?  
- Will the option provide adequate utilities infrastructure to service development to avoid unacceptable impacts on the environment?  
- Will the option safeguard water resources to maintain an adequate level of river and ground water?  
- Will the option reduce the demand for water?  
- Will the option encourage water to be stored for re-use? |  
| 13 | To reduce land contamination and safeguard soil quality and quantity. | - Economic – protection of high quality agricultural land will help to protect the rural economy.  
- **Environmental** – the objective will contribute to the protection | - Will the option reduce the risk of land contamination and protect good quality soil?  
- Will the option reduce the risk of creating further contamination?  
- Will the option help to remEDIATE contaminated sites and where possible carry this out on-site?  
- Will the option prevent soil erosion? |
<table>
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<tr>
<th></th>
<th>and enhancement of the natural environment.</th>
<th>Will the option minimise the loss of good quality agricultural land?</th>
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<tbody>
<tr>
<td>14</td>
<td>To ensure air quality continues to improve and noise and light pollution are reduced.</td>
<td>Social – improvements in air, noise and light pollution will support healthy communities. Environmental – the objective will help to protect the natural environment, improve biodiversity and mitigate against climate change.</td>
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<tr>
<td></td>
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<td>Will the option reduce air, noise and light pollution? Will the option help improve air quality? Will the option support specific actions in designated AQMAs? Will the option reduce pollution from traffic? Will the option encourage the creation of tranquil areas? Will the option ensure that people are not exposed to greater levels of noise? Will the option help reduce light pollution?</td>
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<tr>
<td>15</td>
<td>To protect and enhance landscape character.</td>
<td>Social – the enhancement of the natural environment will support the community’s health and social well-being. Environmental – the objective contribute to the protection and enhancement of our natural environment. Economic – character of the natural environment is a consideration within “smart growth” as they are attractive areas to locate to.</td>
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<td>Will the option protect and enhance the landscape character areas within the authority area? Will the option protect and enhance the Authority’s natural urban greenspace? Will the option protect the AONB, AGLV, and SAC? Will the option protect significant views? Will the option protect and enhance landscape character? Will the option protect the urban fringe? Will the option protect the open countryside?</td>
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16  To conserve and enhance biodiversity.  

<table>
<thead>
<tr>
<th>Social</th>
<th>Environmental</th>
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<tr>
<td>Social – the enhancement of biodiversity will support the community’s health and social well-being.</td>
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<tr>
<td>Environmental – the objective will help to conserve and improve biodiversity.</td>
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- Will the option prevent fragmentation, increase connectivity and create more habitats?
- Will the option secure enhancement in biodiversity in all new development?
- Will the option continue to protect formally designated areas of nature conservation?
- Will the option take account of the effects of climate change on biodiversity?
- Will the option adequately defend and enhance protected species?
- Will the option protect SSSI, SNCI and other designated biodiversity areas (eg SPA)?
Appendix 2 – Appraisal of the draft vision and plan objectives

The SA of the Local Plan vision
The vision will be delivered by the Objectives and provides a look into the future as to what the people and place of Tandridge will be like. A range of words were discussed at the Local Plan Steering Group (LPSG) on 25 September 2015 and turned into the vision that is set out below, this was subsequently taken back to LPSG on 15 October for members to agree.

A vision for the people and place of Tandridge District

The people of Tandridge will enjoy a high quality of life in a friendly and caring community. Homes, jobs and leisure facilities will be available, accessible and offer security and comfort to a mixture of people in terms of age, household and culture.

Our District will be a place with green and open spaces to support the health and wellbeing of the community.

Our successful towns and local centres will be accessible and provide for the needs of residents, businesses and visitors. Places of work and the economy will be prosperous and vibrant.

On recognition of our work with partners, the road network will be improved and the use of sustainable public transport encouraged lessening congestion. Design will have played a key role in ensuring the District remains pleasant, safe and secure, making the most of historic assets and regenerating areas for the benefit of all.

SA Table 1: Appraisal of the Vision

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<th>Sustainability Appraisal</th>
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The vision seeks to enhance the quality of life for individuals and communities, therefore, produces a positive effect across a range of SA objectives.

Sustainability could be improved further if reference to a number of the other Sustainability Objectives was made, such as reducing flood risk, adapting to the changing climate, and to conserve and enhance biodiversity.

The SA of the Local Plan Objectives
The Local Plan – Issues and Approaches (Regulation 18) document sets out a number of objectives which outline the measures the council will encourage to help achieve the strategic vision for the district. The objectives are listed in Table 7, below and the appraisal of the objectives can be found in SA Table 2.

Table 7: Local Plan Objectives

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<th>Economy and Tourism</th>
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<th>Housing</th>
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<tr>
<th>Town Centres / Retail and Leisure</th>
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<tr>
<td><strong>Health and Wellbeing</strong></td>
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<td><strong>Design and Safety / Climate Change</strong></td>
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<td><strong>Natural Environment / Heritage</strong></td>
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<td><strong>Flooding</strong></td>
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<td><strong>Infrastructure</strong></td>
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# SA Table 2: Testing the compatibility of Local Plan strategic objectives

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Objectives Appraisal Commentary

Economy and Tourism (Plan objectives 1, 2, 3 and 4)

These objectives aim to support the local economy and reduce the amount of out-commuting to work from the district. The reduction in commuting and enabling people to live closer to where they work will show many benefits, including improved wellbeing for the population and a reduction in greenhouse gases. A potential conflict has been identified against SA objective 1 (to provide sufficient housing) as currently a proportion of the housing supply within the District is provided on employment sites. Therefore, a more stringent approach to the protection of employment sites may reduce the supply of housing. This potential impact on housing supply can be avoided by ensuring that the Local Plan will deliver a sufficient supply of housing on alternative sites.

Specific reference to our rural economy and flexible working patterns could enhance the Plan objectives.

Housing (Plan objectives 5 and 6)

These objectives focus primarily on the mix, affordability and type of housing to meet different needs. Objective five could be strengthened to recognise the need to provide a sufficient supply of housing as identified in the Strategic Housing Market Assessment. Further sustainability benefits could be achieved by recognising the importance of sustainable locations for development.

Town Centres / Retail and Leisure (Plan objective 7)

This objective recognises the need to maintain and enhance the role of the two town centres within the District, however, the objective should also recognise the importance of the other centres which provide the day-to-day needs for their communities. Whilst the objective encourages leisure opportunities within the town centres it should also note the importance of providing these facilities across the district so that they are accessible to all. The Tandridge District Open Space and Outdoor Recreation Study identifies the importance of providing leisure facilities within walking distance, therefore the plan objective should be expanded to ensure that leisure facilities are protected and provided where necessary across the district to meet the needs of the community and that are accessible to all.

Health and Wellbeing (Plan objective 8)

Overall, this objective produces a positive impact across a range of the SA objectives.
Design and Safety/Climate Change (Plan objectives 9, 10 and 11)

The two design objectives, 9 and 10 score positively against the SA objectives, however, there could be more of a focus on promoting accessible, inclusive environments that can be used by everyone regardless of age, gender or disability. The climate change objective scores very well against the SA objectives.

Natural Environment/Heritage (Plan objective 12)

This objective scores well against the SA framework as it aims to protect and enhance both the historic and natural environment.

Flooding (Plan objective 13)

This objective focuses on the protection of people and their property from all sources of flooding and scores positively against the SA objectives.

Infrastructure (Plan objective 14 and 15)

These objectives recognise the importance of infrastructure provision and as such provide positive effects against the majority of the SA objectives.

Objectives Appraisal Summary

Overall, the objectives provide a strong framework to support and encourage sustainable development in Tandridge. However, recommendations are included which would further improve the sustainability of the plan’s objectives.
Appendix 3 - Consideration of policy approaches

Delivery Strategy Approaches
The Council have identified 7 approaches to the delivery strategy, however, one of these is not considered to be a reasonable alternative. The 6 approaches that have been assessed are set out below, all of which provide a different number of homes and jobs and not all approaches meet the objectively assessed housing needs of 9,400 dwellings across the 20 year plan period (2013-2033) as set out in the Objectively Assessed Needs Paper and the employment need as set out in the Economic Needs Assessment.

SA Table 3 below presents appraisal findings in relation to the six strategic options.

SA Table 3: Delivery Strategy Approaches Appraisals

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<th>Sustainability Appraisal</th>
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</table>

Approach 2a: Residential: Approach 1 + sites within the inset areas in the district (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Woldingham). This could deliver 2,336 dwellings. Commercial: Intensification of existing employment sites within the inset areas. This could deliver 3.2 hectares of employment.

Approach 2b: Residential: Approach 1 + sites within the existing inset areas in the district built at a higher density (at least 70dph). This could deliver 3,403 dwellings. Commercial: Intensification of existing employment sites within the inset areas. This could deliver 3.2 hectares of employment.

Approach 3: Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the main urban settlements and semi rural service settlements (Oxted, Limpsfield, Hurst Green, Caterham on the Hill, Caterham Valley, Warlingham, Whyteleafe, Smallfield, Lingfield and Godstone). This could deliver 8,569 dwellings. Commercial: Intensification of all employment sites within the district. This could deliver 87.4 hectares of employment.
Approach 4: Residential: Approach 1 + Approach 2a + sites that are currently in the Green Belt around the rural settlements (Bletchingley, Woldingham, South Nutfield, Dormansland, South Godstone, Tatsfield, Blindley Heath, Felbridge and Old Oxted). This could deliver 3,895 dwellings.

Commercial: Intensification of all employment sites within the district. This could deliver 87.4 hectares of employment.

Approach 5: Residential: Approach 1 + Approach 2a + Approach 3 + Approach 4 (this scenario is based on maximum capacity). This could deliver 10,128 dwellings and 87.4 hectares of employment.

Commercial: Intensification of all employment sites within the district. This could deliver 87.4 hectares of employment.

Approach 6: A large urban extension or new settlement. The amount of homes and employment space to be provided in this approach are to be determined as the plan progresses. This approach is known as a ‘broad location’ in the NPPF.

SA objective 1: To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.

It is anticipated that the potential level of development for approaches 2a, 2b and 4 will fall significantly below the district’s objectively assessed housing need as identified within the Strategic Housing Market Assessment. It is expected that the need for housing within the district will get worse over time as an under delivery of housing in the initial years of the plan will exacerbate pressure in the future, this will be made worse as the amount of land within the urban areas is a finite resource; resulting in a significant negative effect in terms of the provision of housing.
Due to the number of houses that approaches 3 and 5 would deliver they are likely to have significant positive effects in terms of helping the district to meet objectively assessed housing needs.

Approaches 4 and 5 will increase the supply of housing around the smaller rural settlements within the District which will provide an important opportunity for different types of housing to meet specific sectors of the community in places where development will not have previously been supported. The delivery of these sites may have a significant positive effect benefit in terms of helping to provide access to all types of housing within rural areas that will help meet needs.

Approach 6 will plan for a large scale settlement and while it will deliver a significant amount of housing there are often longer lead-in times which means that this approach has not scored well in the short term.

The policy does not specifically refer to types of housing or to the proportion of affordable housing to be achieved as these requirements will be covered elsewhere in the Plan. However, a greater amount of affordable housing may be possible under approaches 3 and 5 given that these approaches would be likely to deliver major development sites and approach 6 may be able to achieve an even higher level of affordable housing. Larger developments tend to have positive implications for development viability, hence the potential to fund affordable housing provision. Approaches 2a and 2b have limited scope to deliver additional affordable housing in the future as many of the sites will be small in nature.

**SA objective 2: To facilitate the improved health and wellbeing of the whole population.**

It is expected that approaches 1 and 2 will maintain existing levels, however there are concerns that in the long term the cumulative impact of small scale development across the urban areas will increase the pressure on services and facilities that will have a detrimental impact on the health and well-being of the population.

Due to the positive consequences of developing larger sites on viability, approaches 3 to 6 will have the ability to deliver additional services and facilities. The delivery of development on large sites has the potential to generate significant planning obligations that will provide additional community amenities, health facilities and natural greenspace that will all have a positive impact on the health and well being of the population.

The Community Infrastructure Levy (CIL) allows the council to raise funds from developers undertaking new development projects within the district to fund a wide range of infrastructure that is needed as a result of the development. The Council adopted its CIL charging schedule in July 2014 and it is recommended that this approach to funding infrastructure is continued. The charging schedule may need to be reviewed to take account of the level of development within the emerging Local Plan.
SA objective 3: To conserve and enhance, archaeological, historic and cultural assets.

As approaches 2a and 2b focus all the development into the urban areas there is concern that it may have a detrimental impact on the setting of nearby heritage assets, however, at this stage it is not possible to conclude that these approaches will have a negative impact in the long term. Approaches 3 to 6 will have less impact on the setting of historic assets and when it comes to site selection it should be possible to avoid locating development in areas where it would impact on archaeological, historic and cultural assets and there may be the opportunity to protect and enhance these assets.

SA objective 4: To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.

Approaches 2a and 2b continue to focus development into the existing urban areas which benefit from accessible and regular public transport services. If approaches 3 and 6 are progressed there is the opportunity to select sites that have good public transport links.

Approaches 4 and 5 will deliver development in a number of rural settlements that are less well served by accessible and regular public transport services and therefore there is a potential minor negative effect.

SA objective 5: To make the best use of previously developed land and existing buildings.

Approaches 2a and 2b score particularly well against this objective as development will be contained within the extent of the settlements making the best use of previously developed land. While the other Approaches will also deliver housing within the envelope of the settlements they will also provide a significant amount of housing on greenfield land, for this reason they have not scored so well.

SA objective 6: To support economic growth which is inclusive, innovative and sustainable.

Approaches 2a and 2b will put significant pressure on existing employment sites as the need for housing increases over time. This will be made even worse by the Governments recent changes to the permitted development order that allows for some types of commercial premises to be converted to homes. The Council has already seen a significant proportion of its office floor space being converted to homes and it is expected that this will continue in the future.

The other approaches are in line with the finding of the Economic Needs Assessment as they seek to protect existing employment sites across the whole of the District and allow for intensification to meet the demands of an increased labour force. However, there is no disparity between this part of the policy for all the different approaches even though they are all proposing to deliver different amounts of housing. When the approach is chosen more work needs to be carried out to ensure that there is a balance between the number of houses and the number of jobs being delivered.
SA objective 7: To provide for employment opportunities to meet the needs of the local economy.

This has achieved a similar score to objective 6 as there are concerns that only allowing for development to take place on previously developed sites for approaches 2a and 2b will increase the pressure to release employment land for housing.

SA objective 8: To reduce greenhouse gas emissions and move to a low carbon economy.

The approaches (2a, 2b, 3 and 6) that support good access to sustainable transport are considered to perform best in terms of climate change mitigation. Approach 3 performs best as the sites are located near to the existing public transport network, services and infrastructure, however, approach 6 also performs well as a new settlement can be located near to an existing train station and then also provide the necessary services and infrastructure that will help reduce reliance on private motor vehicles.

Matters relating to renewable / low carbon energy generation are also relevant. Larger development sites are more likely to provide biomass fuelled heating systems or Combined Heat and Power (CHP) systems. If it is assumed that concentrating development around the existing urban areas would lead to larger sites being delivered then approach 3 and approach 6 would all lead to positive effects in terms of climate change mitigation. The development pattern promoted by approach 4 is less likely to enable ambitious measures as the sites will be smaller in these rural locations.

SA objective 9: To use natural resources prudently.

Approaches 2a and 2b will mean that there is scope for the reuse of existing materials on site in the construction of the new development. To increase the prudent use of materials on green field sites it is recommended that this should be mentioned in the relevant policy to encourage the use and supply of sustainable products and reduce the use of primary resources.

With regard to post completion the broad spatial distribution of growth is not likely to have a significant bearing on waste management related objectives. It is assumed that there is sufficient capacity at waste management processing facilities to handle waste under any approach. All new development, regardless of location and scale, would likely design-in some waste management facilities.

SA objective 10: To adapt to the changing climate.

As the policies progress it is mainly design issues that can be developed to help to protect the community from the increased extremes of weather, however, the higher densities within approach 2b could exacerbate the impacts of a heat wave. It should be noted that flooding is dealt with separately in the next SA objective.
It is not possible to conclude significant effects (given that climate change mitigation is a global issue and the influence of the growth strategy promoted through the Local Plan will be minor).

**SA objective 11: To reduce flood risk.**

The Strategic Flood Risk Assessment (SFRA) identifies the areas prone to flood risk within the District. The assessment shows that there are areas at risk, however, the Housing and Economic Land Availability Assessment (HELAA) shows that there is sufficient land outside of the flood zones to accommodate the housing. Once the housing approach has been chosen it is then necessary to carry out a flood risk assessment of each site to ensure that flooding is addressed.

Development in any area has the potential to increase surface water runoff rates which could increase surface water flood risk. Approaches 2a and 2b have received a lower score than the others because it is considered that the majority of housing being built on previously developed land will fall under the threshold requiring the installation of a sustainable drainage systems (SuDS). The larger sites associated with the other approaches have the potential to mitigate the effects through the incorporation of a SuDS.

With the climate changing there is an increasing threat of flooding within the district, it is therefore important that the next of the stage of the SFRA carries out a thorough assessment of flood risk to any future development site.

**SA objective 12: To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.**

Through consultation with waste water treatment companies no waste water capacity issues have been identified, however, in the past concerns have been raised with the capacity of the Caterham outfall sewer. Currently there are no restrictions on waste water treatment capacity that will affect any of the strategic growth approaches.

In terms of water efficiency, larger scale developments may enable higher standards of water efficiency; however, this is uncertain.

**SA objective 13: To reduce land contamination and safeguard soil quality and quantity.**

Approaches 2a and 2b score particularly well as these would maximise the use of previously developed land. As the other approaches involve the development of green field sites this would lead to a negative effect.

There are no sites located in mineral safeguarding areas so that there is no risk of development sterilising the mineral resource. The majority of land in the district is of Grade 3 (good to moderate), with a small amount of higher quality land, none of the sites fall within the higher quality designation.
The potential for land contamination has also not been determined at this time, and it is fair to assume that any contaminated sites would be remediated prior to development and adverse effects would be avoided.

**SA objective 14: To ensure air quality continues to improve and noise and light pollution are reduced.**

Air quality in Tandridge District is generally considered to be good, however, there are some areas that are closely monitored and further development could have a detrimental impact. While approaches 2a and 2b will focus development to areas with existing public transport infrastructure there are concerns that additional development within the built up areas could cause localised problems, particularly if the density of development is increased.

Approach 3 focuses development around existing settlements to provide easy access to existing services and facilities, however approaches 4 and 5 will deliver housing in more rural locations that is likely to increase the need to travel and dependency on the car for households to access employment and community infrastructure; resulting in **significant negative effects** in terms of air quality.

It is not yet determined where approach 6 will deliver the new settlement, however, it is very important to choose a location that does not lead to a vehicle orientated community as this could lead to **significant negative effects**.

Although noise and light pollution have not been identified as an issue within Tandridge as a whole there are areas with localised issues and the selection of sites to deliver the approaches will need to consider the impact of the motorways and Gatwick airport on future development.

It is not possible to conclude significant positive effects on the basis that growth could still result in an increase in car travel locally (and possibly traffic congestion to some extent) and future development has the potential to increase light and noise pollution. Essentially, the conclusion of this appraisal is that the assessment of which sites are required to deliver the preferred approach needs to ensure that they support ‘sustainable’ patterns of travel and avoid areas that are subjected to noise pollution.

**SA objective 15: To protect and enhance landscape character.**

Approaches 2a and 2b will focus development into the urban area, therefore protecting the surrounding landscape; however, when the sites are selected it is just as important to protect Tandridge District’s important natural urban greenspace.

The other approaches will deliver housing outside of the urban areas on green field land and will therefore have a negative impact on the surrounding landscape, it is therefore essential that the selection of sites carefully considers the impact that the development will have on the surrounding landscape.
SA objective 16: To conserve and enhance biodiversity.

Approaches 2a and 2b have a neutral score with a question mark as some brownfield sites can be incredibly important for wildlife so further work will be needed to ensure that the redevelopment of the site does not have a detrimental impact on the biodiversity.

The sites required to deliver the other approaches will involve the development of greenfield land, this could have a detrimental impact on the sites biodiversity, therefore it is essential that the site selection will avoid development in sensitive locations.

At this stage significant negative effects are considered unlikely, but impacts to biodiversity could warrant further investigation if development near to sensitive locations is pursued.

**Delivery Strategy Approaches Appraisal Summary**

Approaches 3 and 5 perform well in terms of providing sufficient housing to enable people to live in a home suitable to their needs, however, this level of development does mean that they score relatively poorly against a number of the other sustainability objectives. There are mitigation measures that can be implemented to reduce these impacts and if either of these approaches is taken forward as the preferred approach the site selection process will need to assess, both, their individual impact and the cumulative impact.

Compared to the objectively assessed housing need number, approach 4 will deliver a relatively low number of dwellings so scores poorly against the provision of housing and due to the rural nature of the sites it has also scores poorly against other key sustainability objectives such as reducing the need to travel, improving noise and light pollution, enhancing the landscape character and enhancing biodiversity.

Approach 6 will see the delivery of a large scale development and while it is considered that this will take a number of years to deliver it could provide a significant level of housing in the long term. Due to scales of economy such a development has the potential to make some significant financial contributions to deliver the required level of infrastructure and mitigate against the negative impacts of the development. If this approach is selected as the preferred approach a large number of locations will need to be considered and thoroughly assessed to ensure that the most appropriate location is selected.

Although approaches 2a and 2b have scored very poorly against the SA objectives; provision of sufficient housing and growth of the economy, they have scored well against many of the other objectives as the approaches will seek to protect the environment around the existing built up areas.
Economic and Tourism Approaches
The Council has identified 4 approaches for a policy relating to Economic development and Tourism. The approaches can be found in SA Table 4, below, where the approaches have been appraised against the Sustainability Framework.

<table>
<thead>
<tr>
<th>Sustainability Appraisal</th>
<th>Objective</th>
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<tbody>
<tr>
<td>1</td>
<td>2</td>
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<tr>
<td>A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance</td>
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<td><strong>long</strong></td>
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<tr>
<td>B. Retain Core Strategy Policy 22 – The Economy</td>
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<tr>
<td><strong>short</strong></td>
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<tr>
<td>C. Identify and protect key employment sites and intensify existing sites within the district. This would consider implementing Article 4 Directions to remove permitted development rights and adding conditions to planning permissions to restrict the use of permitted development rights, where this can be justified.</td>
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<tr>
<td>D. Include a policy to support the development of tourism in the district.</td>
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A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance

The NPPF shows that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. While the NPPF aims to secure economic growth in order to create jobs and prosperity the recent changes to the permitted development order, allowing the conversion of commercial to residential, has had a significant impact on the stock of employment floorspace within the district.

This approach scores well against the SA objectives, however there are concerns that this approach will not offer protection against the recent changes to the permitted development order which has seen a decline in available commercial property as it is being converted to residential.

As the policy allows for the conversion of commercial premises it may give the opportunity to remediate contaminated land, increase biodiversity and reduce any noise and light pollution.

B. Retain Core Strategy Policy 22 – The Economy

This approach aims to develop a sustainable economy by making the best use of existing sites but does allow for the use of redundant or unsuitably located sites for housing. As above, there are concerns that that the conversion of commercial premises to residential has and will continue to have a significant impact on the stock of employment floor space.

C. Identify and protect key employment sites and intensify existing sites within the district. This would consider implementing Article 4 Directions to remove permitted development rights and adding conditions to planning permissions to restrict the use of permitted development rights, where this can be justified.

This approach will enable the Council to suspend permitted development rights. The withdrawal of development rights does not necessarily mean that planning consent would not be granted. It merely means that an application has to be submitted, so that the planning authority can examine the plans in detail, therefore it will give the Council the opportunity to consider the loss of employment sites. Since the permitted development changes the Council has received applications (and many of these have been implemented) for the conversion of 11% of the office stock within Tandridge to residential development.
D. Include a policy to support the development of tourism in the district.

Increased tourism could lead to a growth in second homes and houses being used for holiday lets which could reduce the availability of homes. The promotion of tourist attractions within the District will contribute to the wellbeing of the population.

_Economic and Tourism Approaches Appraisal Summary_
Approaches A and B will allow for the conversion of buildings to alternative uses, allowing them to make the best use of previously developed land. However, without control of their release many employment uses will be lost to residential development. Approach C scores particularly well against SA objectives 6 and 7 as it will provide the Council with the necessary tools to protect the strategic employment sites, therefore supporting local jobs, the economy and help to reduce commuting distances.

It is not considered that approach D alone could sufficiently cover this topic area, therefore, it will need to be used in conjunction with, A, B, or C.
Town Centres/Retail and Leisure Approaches
The Council has identified 3 approaches relating to town centres/retail and leisure that it is considering for a policy in the Local Plan. The approaches can be found in SA Table 5, below, where they have been appraised against the Sustainability Framework.

SA Table 5: Town Centres/Retail and Leisure Approaches Appraisals

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<tr>
<td>A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance</td>
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<tr>
<td>B. Retain Core Strategy Policy 23 - Town and other Centres</td>
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<tr>
<td>C. Amend Core Strategy Policy 23 - Town and other Centres, reflecting the recommendations of the Tandridge Retail and Leisure Study and incorporating the emerging Caterham Town Centre Masterplan into the policy.</td>
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A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance

There are concerns that this approach may lead to significant leisure and retail developments outside of the town centres as the NPPF only requires an impact assessment for developments over 2500m². This competition could have a detrimental impact on the existing businesses within the town centres.

While the NPPF supports town centres, this approach would not provide definition as to where the boundaries of town centres are located. In turn, this would mean that there is no certainty for investors as each application will be determined on its merits rather than against a clearly planned approach.

B. Retain Core Strategy Policy 23 - Town and other Centres

Whilst this policy would allow for the provision of a small amount of residential development on the former Rose & Young site and the Oxted gasholder, this is the only residential development that it is promoting within the town centres.

This approach seeks to protect and enhance the role of the town centres, therefore it scores well against SA objectives such as reducing the need to travel, supporting sustainable economic growth and providing employment opportunities to meet the needs of the local economy.

C. Amend Core Strategy Policy 23 - Town and other Centres, reflecting the recommendations of the Tandridge Retail and Leisure Study and incorporating the emerging Caterham Town Centre Masterplan into the policy.

At the time of writing, the Caterham Town Centre Masterplan is in its infancy so it is not certain exactly how it will look to shape the area over the plan period. It is proposed that the Masterplan will look to achieve a better mix of residential and traditional town centre uses, therefore, this approach may deliver additional housing in the medium to long term.

This approach seeks to protect and enhance the role of the town centres, therefore it scores well against SA objectives such as reducing the need to travel, supporting sustainable economic growth and providing employment opportunities to meet the needs of the local economy.

Town Centres/Retail and Leisure Approaches Appraisal Summary

All the approaches seek to maintain the existing role of the centres and provide opportunities for new services and facilities, however approach A scores poorly against a number of the SA objectives, largely due to the lack of certainty that this approach provides.

Approach B scores well against the SA objectives and C scores slightly better against some of the objectives as the possible adoption of the Caterham Town Centre Masterplan will help to create a vibrant sustainable place that will attract a number of different investors to deliver the plan.
It is recommended that whichever of the policies is taken forward it includes a requirement to improve public transport and accessibility to the town centres for pedestrians and cyclists to help mitigate against the increased level of traffic generation.
Health and Wellbeing Approaches
The Council has identified 3 approaches for a policy relating to Health and Wellbeing. The approaches can be found in SA Table 6, below, where the approaches have been appraised against the Sustainability Framework.

SA Table 6: Health and Wellbeing Approaches Appraisals

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<th>Sustainability Appraisal</th>
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<td>B. Retain Core Strategy Policy 13 – Community, Sport and Recreation Facilities and Services.</td>
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<td>C. To prepare a policy based on recommendations contained within the Open Space Assessment.</td>
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A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance

While the NPPF seeks to facilitate social interaction and creating healthy, inclusive communities there are no locally set requirements for the provision of open space across the district. Without clear standards it may be difficult for the Council to seek the provision of new facilities and protect the existing areas.
B. Retain Core Strategy Policy 13 – Community, Sport and Recreation Facilities and Services.

This approach scores well against a number of the SA objectives. However, there are concerns that the policy would not be sufficient if the Local Plan aims to deliver a large amount of new dwellings over the plan period. The policy also seeks the protection of community services and facilities, this may be addressed in the infrastructure section of the emerging local plan, but if not, it is important that the policy continues to do so.

C. To prepare a policy based on recommendations contained within the Open Space Assessment.

The provision of open space within the district is relatively good; however, should the Local Plan make provision for large population growth there would be a number of deficiencies. This approach will ensure that an adequate level of open space is provided to meet the requirements of the population by 2033.

**Health and Wellbeing Approaches Appraisal Summary**

Management of open space and woodlands will protect and enhance natural historic environments and the setting of the built historic environments. The provision of local open space will make it accessible to all and reduce the need to travel elsewhere, therefore decreasing the amount of greenhouse gas emissions released from car journeys. The provision of further open space may create additional jobs in the leisure sector. Open space will protect the landscape and biodiversity, there is also be the opportunity to create some dual use open space that will also offer some flood protection measures.

All of the approaches will help to protect and where possible increase the amount of open space within the district, however, it is considered that the more prescriptive approach taken in C will add certainty and ensure that an adequate level of open space is provided.
**Design and Safety Approaches**

The Council has identified 4 approaches for a policy relating to design and safety. The approaches can be found in SA Table 7, below, where the approaches have been appraised against the Sustainability Framework.

With no decision made on what delivery strategy the Council will choose, density planning policies cannot be prepared. Approaches relating specifically to density are likely to be generated, where appropriate, in the next version of the Local Plan document.

**SA Table 7: Design and Safety Approaches Appraisals**

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<th>Sustainability Appraisal</th>
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<th>13</th>
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<tr>
<td>A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.</td>
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<td>B. Retain Core Strategy Policy 18 - Character and Design and Policy 19 - Density.</td>
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<td>N/A</td>
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<td>C. Prepare a more prescriptive policy design and safety planning policy</td>
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<td>D. Recognise and defer local design policies to Neighbourhood Plans</td>
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</table>

While the NPPF seeks to plan positively for high quality and inclusive design it will not provide any locally distinctive design policies. As each application will be considered on a case by case basis it will not achieve a consistent approach that could have a detrimental impact on the setting and defining characteristics of an area.


This is an overarching design policy that covers the whole of the district. Reference is made to Village Design Statements, however, only one of these have been adopted within the District so if this policy is taken forward as the preferred approach other areas of the District should consider the production of design statements.

C. Prepare a more prescriptive policy design and safety planning policy

A prescriptive policy will ensure that the design of the development responds positively to the site and the local character of the area. There are concerns that the character of the built up area varies considerably across the district, therefore, the policy will need to reflect this and have a degree of flexibility.

D. Recognise and defer local design policies to Neighbourhood Plans

The production of a Neighbourhood Plan allows community groups to take the lead in shaping the future of their neighbourhood with design being a fundamental part. While the areas covered by Neighbourhood Plans would have locally distinctive design policies that will respect the character, setting and local context, not all areas Parishes have started in the production of a Neighbourhood Plan which could lead to an inconsistent approach across the district.

**Design and Safety Approaches Appraisal Summary**

All of the approaches are seeking a high quality of design, however, it is considered that approaches B and C have the potential to most effectively respect and respond to the local area.

The provision of good design in development can have positive impacts on health and well-being. Well-designed places can help encourage social interaction, access to local services and promote a safe environment. Good design can have positive impacts on landscape character by ensuring that development responds positively to the local character of the area. Whichever approach is chosen the policy should place an emphasis on sustainable construction and promote recycling facilities within developments such as community composting and outside storage for recyclable goods.
Environmental Design Approaches

The Council has identified 5 approaches for a policy relating to environmental design. The approaches can be found in SA Table 4, below, where the approaches have been appraised against the Sustainability Framework.

**SA Table 8: Environmental Design Approaches Appraisals**

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<th>Sustainability Appraisal Objective</th>
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<td>A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.</td>
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<td>E. Allocate specific sites for large scale energy generation.</td>
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The NPPF promotes the production of energy from renewable and low carbon sources, however, without specific targets it may be difficult to negotiate on a site by site basis and maximise the delivery of these technologies. Without the identification of suitable areas for locating renewable energy technologies there could be adverse impacts on the landscape. The reliance solely on the NPPF will mean that development in the future will meet building regulations, but the Council will not be able to require standards above this.

B. Rely solely on Building Regulations in respect of access and water, and an optional nationally described space standard.

This approach will achieve a similar standard of development as approach A, for this reason they have achieved the same score. However, this approach will set an internal space standard, helping to ensure that future development is the size and type of housing that is needed and for this reason this approach has scored positively against SA objective 2 which looks to improve the health and wellbeing of the population. When the assessment for the space standard is carried out it need to be considered alongside the ‘design and safety’ policy as they are closely linked.

C. Seek to require optional standards above Building Regulations.

While this approach will allow the Council to set bespoke standards for access and space, it is considered that the ability to improve water efficiency standards will have a direct impact on environmental design. The production of the ‘design and safety’ policy will need to consider the possibility of setting access and space standards that exceed those set out in Building Regulations, if justified. The ability to improve water efficiency in new development will assist in the adapting to the impacts of the changing climate, as a result this approach has scored well against the SA objective 10.


Part of the policy encourages the use of the Code for Sustainable Homes. However, this approach can no longer be used as it has been superseded at a national level. This approach encourages commercial development to meet the ‘BREEAM’ “very good” standard which will significantly improve the environmental performance of the buildings. The Council have been successfully ensuring that all new development provides a saving in CO₂ emissions from renewable energy technologies, therefore it scores practically well against SA objective 8 which seeks the reduction of greenhouse gas emissions and movement to a low carbon economy.

2 BREEAM is a design and assessment method for sustainable buildings
E. Allocate specific sites for large scale energy generation.

Although it is considered that some forms of energy generation could have a detrimental impact on the landscape this approach will ensure that they are located in an area of minimal impact and if a significant number of renewables are being considered the cumulative impact on the landscape is properly assessed. Following the SA appraisal it is recommended that the approach is amended to state, “large scale renewable or low carbon energy generation”.

Environmental Design Approaches Appraisal Summary
All of the approaches have scored well as they seek to improve the environmental performance of future buildings. Approach D scores particularly well as it requires a reduction in CO₂ emissions above those required by building regulations. Approach C also scores well, however, it may initially impact on the viability of delivering housing in the short term, but, this will be overcome and in the longer term it will reduce running costs for the resident.

The reduction of greenhouse gas emissions is a global issue but taking a broad view of these different policy approaches they will help to mitigate against the changing climate to varying degrees. It is not considered that any of the approaches will have any detrimental significant impacts, however, if any sites are allocated for large scale energy generation their impact on the landscape and biodiversity needs to be carefully considered.
Landscape Approaches

The Council has identified 4 approaches for a policy relating to landscape. The approaches can be found in SA Table 9, below, where the approaches have been appraised against the Sustainability Framework.

SA Table 9: Landscape Approaches Appraisals

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<th>Sustainability Appraisal</th>
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<tr>
<td>B. Retain Core Strategy Policy 20 - Areas of Outstanding Natural Beauty and Policy 21 - Landscape and Countryside</td>
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<tr>
<td>C. Amend Core Strategy Policy 20 - Areas of Outstanding Natural Beauty (AONB) to remove reference to the Area of Great Landscape Value and replace with Surrey AONB candidate areas</td>
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<tr>
<td>D. Prepare more prescriptive policies, which designates local landscape character area and includes reference to AONB Management Plans.</td>
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While this approach will give great weight to conserving the landscape and scenic beauty to the Areas of Outstanding Natural Beauty, it will be difficult to protect the other landscapes without a locally specific policy. The NPPF supports local landscape designation and therefore some element of a local policy is likely to still be needed.

B. Retain Core Strategy Policy 20 - Areas of Outstanding Natural Beauty and Policy 21 - Landscape and Countryside

These policies conserve and enhance the landscape character of the district and CSP 20 of the Core Strategy sets out the principles that should be followed in the AONB and AGLV. This approach scores well against the SA objectives as it offers a high level of protection for the AONB and AGLV and it will also conserve and enhance other landscapes across the district. However, CSP20 still refers to the AGLV as a land designation which is unlikely to be carried forward due to its connection with the now revoked Surrey Structure Plan and an up to date consideration of the land currently considered as AGLV will be needed.

C. Amend Core Strategy Policy 20 - Areas of Outstanding Natural Beauty (AONB) to remove reference to the Area of Great Landscape Value and replace with Surrey AONB candidate areas

This offers a robust approach to the conservation and enhancement of the AONB and the candidate areas where the AONB may be extended to include. However, the AONB candidate areas do not cover all of the land currently included as AGLV and the policy does not offer any protection to landscapes outside of these areas. If this approach is taken forward it is recommended that text is included within the policy to protect the character and distinctiveness of all the districts landscapes as supported by relevant evidence such as the Landscape Character Assessment.

D. Prepare more prescriptive policies, which designates local landscape character area and includes reference to AONB Management Plans.

This approach scores particularly well as local landscapes will be carefully selected and a prescriptive policy is an effective tool to protect the area as appropriate. While the NPPF does place great weight on the protection of AONBs, reference to the AONB Management Plans will offer locally distinct policy to ensure that these areas are planned positively for their protection, enhancement and management.

Landscape Approaches Appraisal Summary

The area where the AONB is located close to the built up area and established settlements is limited so its protection should not significantly impact on the delivery of housing or other development. Approach B and D look to protect legitimate areas in addition to the AONB and across the District. This could include large areas of the District and consideration of the current evidence, including the Surrey Landscape
Character Assessment and further work will need to be done to assess the landscape to ensure that those of high intrinsic value will be protected and taken into account when considering future development.

The conservation and enhancement of the landscape will help to increase tourism to the District and there may also be the opportunity for rural jobs. Protection of landscape also contributes to the protection of water quality and safeguarding soil quality. However, landscape designation might prevent some forms of renewable energy production taking place within the District if it results in prohibitive policies for the benefit of the landscape and could limit the locations where renewables could be sited.
Biodiversity and Geodiversity Approaches
The Council has identified 3 approaches for a policy relating to biodiversity and geodiversity. The approaches can be found in SA Table 10, below, where the approaches have been appraised against the Sustainability Framework.

SA Table 10: Biodiversity and Geodiversity Approaches Appraisal

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The NPPF aims to conserve and enhance biodiversity by setting out a number of principles which largely focus on the protection of nationally designated sites. This approach has scored positively against a number of the SA objectives. However, as the NPPF only focuses on national designations it has scored lower than the other approaches as it lacks the local distinctiveness.
B. Retain Core Strategy Policy 17 – Biodiversity

This approach scores well against the SA objectives as it looks to enhance and where possible provide for the expansion of biodiversity in accordance with the aims of the Surrey Biodiversity Action Plan. If this policy is taken forward it will need to be updated to reflect the introduction of the Biodiversity Opportunity Area Policy Statements and the Biodiversity Planning in Surrey document.

C. Prepare prescriptive policies, identifying in detail the Council’s approach to different types of biodiversity and geodiversity assets

This approach offers the opportunity to protect and enhance areas within the District, which are not currently designated, to enhance the quality and character of places. For example the NPPF relates mainly to ‘green spaces’ in the natural environment and a locally distinctive policy could recognise the contribution that the built environment plays in terms of protecting and supporting species of flora and fauna.

Biodiversity and Geodiversity Appraisal Approaches Summary

The protection and identification of new environmental areas may restrict housing development in the long term, the same could also be said for the supply of employment land, however, the Economic Needs Assessment is looking to make the best use of existing sites rather than the allocation of new sites. In addition to the designated biodiversity assets, back garden land and brownfield sites can also be very valuable, it is therefore important that the policy makes reference to this to offer them the necessary protection.

Heritage assets can make a significant contribution to biodiversity for species such as bats, owls and plant life. There is no mention of heritage assets within the policy and this could be included to acknowledge this positive impact.

The protection and enhancement of biodiversity will enrich the local environment, make them more accessible, act as a green lung when delivered in an urban area and contribute to our well-being.

All of the approaches offer protection to biodiversity within the District and relate to ‘green areas’ in the natural environment. However, approach C offers the opportunity to recognise the contribution that the built environment can make to biodiversity in terms of protecting and supporting species of flora and fauna.
Heritage Approaches
The Council has identified 4 approaches for a policy relating to heritage assets. The approaches can be found in SA Table 11SA Table 4, below, where the approaches have been appraised against the Sustainability Framework.

SA Table 11: Heritage Approaches Appraisals

<table>
<thead>
<tr>
<th>Sustainability Appraisal</th>
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<td>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16</td>
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</table>


| short     | - | + | + | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |
| medium    | - | + | + | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |
| long      | - | + | + | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |

B. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance and commit to a review of Conservation Areas

| short     | - | + | + | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |
| medium    | - | + | + | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |
| long      | - | + | + | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |

C. Develop a specific heritage policy but not commit to a review of Conservation Areas

| short     | - | + | ++ | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |
| medium    | - | + | ++ | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |
| long      | - | + | ++ | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |

D. Develop a specific heritage policy and commit to a review of Conservation Areas

| short     | - | + | ++ | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |
| medium    | - | + | ++ | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |
| long      | - | + | ++ | + | +/-? | N/A | N/A | - | + | N/A | N/A | N/A | N/A | N/A | N/A | 0 | 0 |

The NPPF provides a positive strategy for the conservation and enjoyment of the historic environment and would require an applicant to describe the significance of any heritage assets affected. The policy has scored well against the majority of the sustainability objectives and with the existing list of designated heritage assets this approach would offer a stable approach to the conservation of the historic environment.

B. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance and commit to a review of Conservation Areas

There are 19 conservation areas within Tandridge district and this approach would see a review of them, identify if further parts should be included and consider additional conservation areas. A review of the conservation areas will ensure that all the features, listed or otherwise, within the area, are recognised as part of its character. Due to the time it will take to complete the conservation area appraisals it is considered that the benefits will only be seen in the medium to longer term.

C. Develop a specific heritage policy but not commit to a review of Conservation Areas

The provision of a locally distinctive policy is a favourable approach that will take account of protecting and enhancing the significance of heritage assets and make the most of opportunities to draw on the contribution made by the historic environment to the character of place. There are concerns that the existing conservation areas have not been reviewed since they were introduced so may lack the specific detail.

D. Develop a specific heritage policy and commit to a review of Conservation Areas

The approach scores positively against the SA objectives as it will provide a locally distinctive policy and a review of the conservation areas, however, due to the time it will take to complete the appraisals it is considered that the benefits will only be seen in the medium to longer term.

Heritage Approaches Appraisal Summary

All of the approaches score well against the SA objectives as they provide a positive strategy for the conservation and enjoyment of the historic environment.

The conservation and enhancement of historic buildings brings benefits to community vitality in terms of maintaining our cultural heritage. However, there could be instances where this could hinder the redevelopment of a building for alternative uses and this may in turn lead to the building or asset becoming vacant. There could also be restrictions imposed on the historic environment that could limit the quantum of development.
Approaches C and D gives the opportunity for the policy to clearly set out the importance of heritage assets and how they can add to local distinctiveness and to sense of place, in turn bringing positive effects for the community. A review of the conservation areas, which is required in approaches B and D, will have a positive impact, however, due to the time it will take to carry out this work it is anticipated that this will occur in the medium to long term.
Green Belt Approaches
The Council has identified 2 approaches for a policy relating to the Green Belt. The approaches can be found in SA Table 12, below, where the approaches have been appraised against the Sustainability Framework.

SA Table 12: Green Belt Approaches Appraisals

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<thead>
<tr>
<th>Sustainability Appraisal</th>
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<th>13</th>
<th>14</th>
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<th>16</th>
</tr>
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<tbody>
<tr>
<td>A. Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.</td>
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<td>N/A</td>
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<td>B. Reiterate national policy and set out that infill development within Green Belt Settlements would be supported.</td>
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The NPPF attaches great importance to the Green Belt and therefore there is a presumption against development, except in limited circumstances. As a consequence, this approach performs poorly in respect of the provision of sufficient housing but scores more positively in objectives related to the natural environment. However, it should be noted that a recent government consultation is proposing that development in the green belt will be allowed on brownfield sites and on sites that have been allocated in Neighbourhood Plans.

B. Reiterate national policy and set out that infill development within Green Belt Settlements would be supported.

This approach is appraised similarly to approach A. However, allowing for limited infill development within Green Belt Settlements may enable the delivery of needed new homes within such locations and thus has the potential to have some positive effects in relation to the first objective. The approach would still score positively in relation to the natural environment as it would still limit development across the majority of the Green Belt.
Green Belt Approaches Appraisal Summary

The NPPF approach to Green Belt policy only allows for development to take place in very special circumstances which is a constraint to the delivery of housing. However the NPPF does allow for the review of Green Belt boundaries through the Local Plan process in exceptional circumstances, this could include the need to promote sustainable patterns of development.

The Green Belt policy will assist in the protection of open space within the countryside, therefore, having a positive impact on the protection and enhancement of the landscape and biodiversity. However, the Green Belt designation can provide a constraint to some forms of renewable energy and low carbon technologies being installed.
Aviation Planning Policies

This policy area covers Redhill Aerodrome and two airports that are outside of the district, Gatwick Airport and Biggin Hill Airport. Although they are located outside of the district they have a significant impact on the area. At the time of writing the future for both these airports is uncertain as the Government is yet to determine whether another runway will be provided at Gatwick or Heathrow and the expansion of Biggin Hill is set out in the Bromley’s draft Local Plan, for this reason it is difficult to assess the approaches against the SA objectives.

Nevertheless, the Council has identified 4 approaches for a policy relating to aviation. The approaches can be found in SA Table 4, below, where the approaches have been appraised against the Sustainability Framework.

<table>
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<tr>
<th>Sustainability Appraisal</th>
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| short | 0 | -/? | N/A | +/- | N/A | + | + | ? | N/A | N/A | N/A | N/A | N/A | -/? | -/? | -/? |
| medium | 0 | -/? | N/A | +/- | N/A | + | + | ? | N/A | N/A | N/A | N/A | N/A | -/? | -/? | -/? |
| long | 0 | -/? | N/A | +/- | N/A | + | + | ? | N/A | N/A | N/A | N/A | N/A | -/? | -/? | -/? |

B. Retain Core Strategy Policy 16 – Aviation

| short | 0 | 0 | N/A | + | N/A | - | - | + | N/A | N/A | N/A | N/A | N/A | 0 | 0 | 0 |
| medium | 0 | 0 | N/A | + | N/A | -/? | -/? | +/- | N/A | N/A | N/A | N/A | N/A | 0 | 0 | 0 |
| long | 0 | 0 | N/A | + | N/A | -/? | -/? | +/- | N/A | N/A | N/A | N/A | N/A | 0 | 0 | 0 |

C. Amend the wording in Core Strategy Policy 16 - Aviation to recognise individual activities at airports in relation to land use within Tandridge.

| short | 0/? | ? | N/A | ? | N/A | + | + | ? | N/A | N/A | N/A | N/A | N/A | 0 | 0/? | 0/? |
| medium | 0/? | ? | N/A | ? | N/A | + | + | ? | N/A | N/A | N/A | N/A | N/A | 0 | 0/? | 0/? |
| long | 0/? | ? | N/A | ? | N/A | + | + | ? | N/A | N/A | N/A | N/A | N/A | 0 | 0/? | 0/? |

D. Keep liaising with Gatwick and Biggin Hill as well as with adjoining local authorities on the approach to Gatwick and a potential second runway, and the expansion at Biggin Hill. The Council could safeguard land for whether Gatwick came forward, however, an appropriate
location for this is unknown at this moment in time. The Council could suggest that the Local Plan is reviewed in 5 years following adoption to take account of Gatwick and Biggin Hill.

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A. **Rely on the National Planning Policy Framework and its supporting Planning Practice Guidance.**

Reliance on the NPPF could lead to an approach that would allow for development in the future that will support economic growth and provide local jobs, however, this would lead to a detrimental impact on the environmental indicators. This unplanned approach to aviation related development at a local level would not provide any certainty to investors, residents or businesses and mitigation measures may be missed.

B. **Retain Core Strategy Policy 16 – Aviation**

This policy will retain the amount of flying within the currently agreed limits, therefore, not exacerbating air, noise and light pollution. However, it is unsure what will happen in the longer term as the legal agreement restricting a second runway at Gatwick Airport expires in 2019 and the Government has delayed its decision on airport expansion. The policy looks to minimise the use of the private car to travel to the airport, therefore scoring well against SA objective 4. This is a restrictive approach to aviation in and around the District which could have a detrimental impact on the local economy and reduce the provision of local jobs in the future. However, it does score positively against the environmental indicators as it looks to retain development within the agreed limits.

C. **Amend the wording in Core Strategy Policy 16 - Aviation to recognise individual activities at airports in relation to land use within Tandridge.**

Without it being clear how Gatwick and Biggin Hill will develop in the future it is unknown what level of associated development would be required. Recognising the need for airport related land uses within the District will help the airports to develop.

D. **Keep liaising with Gatwick and Biggin Hill as well as with adjoining local authorities on the approach to Gatwick and a potential second runway, and the expansion at Biggin Hill. The Council could safeguard land for whether Gatwick came forward, however, an appropriate location for this is unknown at this moment in time. The Council could suggest that the Local Plan is reviewed in 5 years following adoption to take account of Gatwick and Biggin Hill.**
While it is not known how Gatwick or Biggin Hill airports will develop in the future the approach of safeguarding land could provide for the necessary homes and employment floor space that would be required, therefore scoring positively against SA objectives 1, 6 and 7. The safeguarding of land near to the airport for activities associated with Gatwick will reduce travel distances.

**Aviation Approaches Appraisal Summary**

There is a large degree of uncertainty in assessing these policy approaches as it is not known how Gatwick or Biggin Hill airports will develop in the future. The current approach achieves the best results against the environmental objectives as it aims to minimise the impact of the airports and oppose any expansion beyond the agreed limits, however, as the legal agreement that restricts a second runway at Gatwick expires in 2019 it is uncertain how this policy would perform in the longer term. The other approaches may have a positive impact on the economy if the expansion of the airports are supported, however there could be some significant detrimental environmental impacts, therefore if any of these approaches are pursued they will need to carefully consider mitigation measures.