Tandridge District Council ‘Our Local Plan: 2033’ Examination Hearing Statement in response to the Inspector’s Initial Matters, Issues and Questions, Document ID/5 V3 submitted by the Woldingham Association

Matter 1: Procedural/legal requirements

Issue: Whether all Statutory and Regulatory requirements have been met?

<table>
<thead>
<tr>
<th>Sustainability Appraisal</th>
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<td>1.2 Is the Sustainability Appraisal (SA) adequate?</td>
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<td>1.3 Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?</td>
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<td>1.4 Has the SA taken into account the reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?</td>
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1.1 We answer “no” to all Q1.2-1.4 based on our examination of the SA policy assessment for TLP13: Rural Exception Schemes contained in MD5: Tandridge Local Plan 2033 Sustainability Appraisal Volume 2 Options Assessments 2019 (page 264, section 5.16.13).

1.2 With regards to Q1.3, the assessments and their conclusions regarding TLP13 are based on faulty reasoning due to a combination of:

a. relying on the flawed and inflated affordable housing assessment which do not reflect “local need” as defined by those that qualify for Bands A-C,

b. the apportioning of these incorrect figures to the Parish-level,

c. not recognising the additional legal complexity involved in securing affordable housing in perpetuity in areas outside of Annex 3 areas which means the proposed expansion outside of Annex 3 will not be effective,

d. not recognising the increase in land values from allowing open market housing and introducing the upper limit, both which will adversely impact delivery compared to today, and so the situation will be worsened than under the Core Strategy.
1.3 With regards to Q1.4:
   a. the reasonable alternatives are not correctly defined
      • the “no policy” option assumes that TLP12 makes no contribution to meeting affordable housing needs, and
      • the assessment does not recognise that TLP12 has already expanded provision beyond the Core Strategy,
   b. not all reasonable alternatives were identified, for example:
      • rely on TLP12 with the thresholds increased in line with the viability study,
      • carry forward the Core Strategy approach,

1.4 More detail can be found in paragraphs 18.51-18.53 of our Regulation 19 representation on TLP13 and in our answers in Matter 2/Q2.4 and Q2.20.

1.5 We add that the SA assessment for Policy TLP12: Affordable Housing Requirements in MD5 (page 263, section 5.16.12) also exhibits many of the above issues.

1.6 These flaws means that at least in these two policy examples we conclude that the answers to Q1.2-Q1.4 are “no”.