Independent Examination of Tandridge Local Plan
Inspectors’ Matters, Issues and Questions for Examination

Environment Agency Comments

Matter 8: Development Management Policies
Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?

TLP35: Biodiversity, Ecology and Habitats
8.60 Is the Policy consistent with paragraph 109 of the Framework in respect of net gains in biodiversity?
8.61 Are the proposed Modifications necessary for soundness?

1. The policy does now refer to a Biodiversity Net Gain in line with the Framework. However, without a specific target or plan for how and where this could be achieved at a strategic level the plan will be dependent on site-based initiatives. This may not deliver a strategic net gain across the district.

2. Therefore, we do recommend that the Council considers what it could do to provide a more strategic landscape scale plan that could ensure net gain is delivered and maintained in the long term.

TLP47: Sustainable Urban Drainage and Reducing Flood Risk
8.89 Is Policy TLP47 consistent with the Framework in regard to the impacts of climate change on flood risk?

3. The impact of climate change needs to be sufficiently taken into account with regard to potential increase in flood risk.

4. Due to restricted capacity of the existing foul and combined surface water systems we would request that consideration be given to the requirement that all new housing development have mandatory surface water storage installations.

TLP48: Water Consumption
8.93 The Policy seeks to apply the Building Regulations optional requirement of 110 litres/person/day. Is this justified?

5. It is justified because the area, as the rest of south east England, is designated as an area of serious water stress in the document: https://www.gov.uk/government/publications/water-stressed-areas-2013-classification
6. If Tandridge District Council were not to adopt this requirement it would be exceptional among Councils in the area.

7. We are disappointed that the Local Plan has no requirement for non-residential developments to meet BREEAM standards of Very Good or Exceptional. That was recommended by the Council's own water cycle study (Phase 1 page 39, final bullet), and again is a requirement of many other councils in the area, in order to help offset water stress. The water cycle study alleges that TDC's Core Strategy seeks the BREEAM "Very Good" standard (Phase 1 page 17, bottom). Phase 2 of the Water Cycle Study lists this as an action on Tandridge District Council in section 4.2.5 (page 26, final item on this page, and page 78, top). We mentioned this in our reply to the consultation.

8.94 Are the proposed Modifications necessary for soundness?

8. The proposed modifications remove ambiguity and conform to well-defined and conventional terminology for the phrases "rainwater harvesting" and "greywater recycling", which are different processes.