Tandridge District Council: Examination of ‘Our Local Plan: 2033’

Tandridge District Council Hearing Statement

Matter 1 Procedural /Legal Requirements

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

September 2019
Notes:

1. The term 'The Council' or the abbreviation ‘TDC’ is used as shorthand for Tandridge District Council
2. The abbreviation LP is used for the submitted ‘Our Local Plan 2033’ (MD1)
3. All quotations are distinguished in italics and referenced in brackets
4. All references are to published LP evidence documents and the 2012 NPPF and associated 2014 PPG unless otherwise stated
**Duty to Cooperate**

1.1 Is there clear evidence that, in the preparation of the Plan, the Council has engaged constructively, actively and on an ongoing basis with neighbouring authorities and prescribed bodies on strategic matters and issues with cross-boundary impacts in accordance with section 33A of the Planning and Compulsory Purchase Act 2004, as amended [the 2004 Act]? Is there clear evidence that the Council has done all it reasonably could to maximise the effectiveness of plan preparation by cooperating with all other relevant bodies, particularly in respect of addressing unmet housing need?

**Response to Inspector’s Issues / Question**

1.1.1 Yes. Published evidence (SDTC series) demonstrates that the Council has met the requirements of the Duty to Cooperate (DTC).

1.1.2 DTC geography has been defined mainly on the wider Housing Market Area (HMA). This is detailed in the Council’s response to Q2.1 in Examination Document TED04.

1.1.3 The focus of the Council’s DTC work has been to engage with all planning authorities (LPAs) and the prescribed or main economic development and infrastructure providing bodies acting within, or relevant to, this area. This has necessitated working across the Greater London boundary and county boundaries (Sussex / Kent). It has been useful to extend DTC liaison over a wider area for some issues, particularly in the context of general Surrey County cooperation.

1.1.4 The Council has been conscious of the need to maintain full awareness of the plan making position in the area around Tandridge. Wherever necessary the council has participated constructively and appropriately in the informal and statutory plan making processes of other LPAs. The latest position is summarised in the Table at Appendix 1. This information assists in understanding the context for the Council’s approach to DTC and decisions on its own LP. The Appendix is also relevant to consideration of other Inspector’s questions on substantive / non-procedural matters. This includes strategic issues around market and functional areas, housing and economic development needs, plan requirements and unmet need.

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1.1.5 As part of the DTC process the Council has sought to prepare and, where possible, agree Statements of Common Ground (SCG) which capture the position of the relevant planning authorities and other councils or bodies involved in Tandridge DTC.

1.1.6 SCG with Reigate and Banstead Borough Council (RBBC), London Borough of Croydon (LBC), London Borough of Bromley (LBB) and Highways England (HiE) were still in process at the time of preparing this Statement. The Council expects to be able to finalise and publish these SCG in time for the Examination hearings. Regardless of this, drafts have been under discussion for some time and these will be made available if it is not possible to provide final agreed SCG. There are particular reasons for the delays in agreeing these SCG:

- RBBC - A Local Plan Examination in process on a site allocations Plan and uncertainties over the future of Redhill Aerodrome. The Plan process has only recently reached a point whereby a SCG can be agreed.
- LBC - Detailed discussions on some matters of detail have delayed finalisation (particularly over LP Housing allocation HSG06 in the Plan – Land off Salmons Lane West, Caterham).
- LBB - Detailed discussions on some matters of detail have delayed finalisation.
- HiE - The SCG is linked to the Council’s current Housing Infrastructure Fund (HIF) bid for A22 junction improvements. This bid is currently under assessment with direct involvement of HiE (INF1).

1.1.7 The Council’s view is that the points of disagreement noted in published SCG and any outstanding issues are non-strategic. They relate to relatively minor matters where cooperation is required on cross boundary site related points or detailed implementation of the LP. There are no fundamental strategic issues outstanding. This is illustrated in the published SCG and related representations on the Publication Draft Plan.

1.1.8 There are no representations from the DTC planning authorities or bodies that suggest the Council’s work on the LP generally, and specifically its DTC procedural approach, has been in any way lacking. SCG and representations show that none of the DTC planning authorities is in a position to meet any housing or economic development needs that cannot be met in Tandridge.

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1.1.9 Some (non-DTC party) representations suggest that the Council’s DTC work has not been adequate in respect of the need to quantify and meet development need across the sub-region. It is acknowledged this may become a substantive DTC issue in the longer term, particularly in relation to addressing Standard Method housing needs figures, the potential for dealing with unmet need across local authority boundaries and new expectations on joint planning under NPPF 2018/19. However, these matters cannot be addressed through the current LP process or on an individual local authority basis due to the scale of the issue with meeting housing need across the South East. It is also important to stress that such matters are not part of a legal judgement about procedures and the Council’s engagement efforts and LP outcomes under DTC now.

1.1.10 This response should be read in conjunction with the responses to questions under Matter 2.

Evidence

INF1 – Tandridge District Infrastructure Delivery Plan 2019
SDTC1 – Statement of Common Ground Crawley Borough Council 2018
SDTC2 – Statement of Common Ground Guildford Borough Council 2018
SDTC3 – Statement of Common Ground Mid Sussex District Council 2018
SDTC4 – Statement of Common Ground Mole Valley District Council 2018
SDTC5 – Statement of Common Ground Sevenoaks District Council 2018
SDTC6 – Statement of Common Ground Surrey County Council 2018
SDTC7 – Statement of Common Ground Wealden District Council 2018
SDTC8 – Statement of Common Ground West Sussex County Council 2018
SDTC9 – Duty to Cooperate Statement Update 2018
SDTC10 – Interim Surrey Local Strategic Statement 2016-2031 2017
SDTC11 – Duty to Cooperate Statement Update 2017
SDTC12 – Duty to Cooperate Statement Update 2016
SDTC13 – Duty to Cooperate Statement Update 2015

Document Reference TED03:
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SDTC14 – Paper Setting Out Position of the Surrey Local Strategic Statement 2015
SDTC15 – Tandridge Local Plan Duty to Cooperate Framework Scoping Statement 2014
Additional SCG (to follow as available)

Appendices

Neighbouring and Adjoining Local Planning Authority Plan Making Position April 2019
(Note: Same Appendix used for Matter 2 Statement)

Supporting Papers

None
Sustainability Appraisal

1.2 Is the Sustainability Appraisal (SA) adequate?

Response to Inspector’s Issues / Question

1.2.1 Yes. The Sustainability Appraisal (SA) conducted in support of the Local Plan has fully met all statutory regulatory requirements and fully met the requirements of national guidance.

1.2.2 The SA has been an iterative process that has been produced and updated in the process of producing the reports listed in the supporting ‘Evidence’ section to this statement. The final SA reports accompanying the Submission Local Plan 2033 represent the culmination of the iterative process at the point of submission. As such it updates and revises earlier work, as well as demonstrating ongoing monitoring of contextual and baseline information originally set out in the 2015 Scoping Report.

1.2.3 An SA of the Local Plan is required by Section 19 of the 2004 Act which incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004¹, which implement the requirements of the European Directive 2001/42/EC². More generally, section 39 of the 2004 Act requires that the authority preparing a Local Plan must do so “with the objective of contributing to the achievement of sustainable development”. Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues.

1.2.4 The Table below (From section 1.6 of document reference of the SSHA2 - Sustainability Appraisal Regulation 19 Stage Volume 1 Context 2018) outlines where in the SA the requirements of the Strategic Environmental Assessment Regulations have been met.

¹ Commonly referred to as the ‘Strategic Environmental Assessment Regulations
² The Strategic Environmental Assessment Directive (SEA Directive)

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The report shall include such information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12(4)).

When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.

<table>
<thead>
<tr>
<th>Requirements</th>
<th>Where met?</th>
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<tbody>
<tr>
<td>Preparation of an environmental report that identifies describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme (regulation 12(2)).</td>
<td>Sustainability Appraisal Scoping Report (2015). Updated in Final SA of the Submission Local Plan – Chapters 3 and Appendix 1.</td>
</tr>
<tr>
<td>The report shall include such information referred to in Schedule 2 as may reasonably be required, taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in the process to avoid duplication of the assessment (regulation 12(3)). Information may be provided by reference to relevant information obtained at other levels of decision-making or through other EU legislation (regulation 12(4)). When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.</td>
<td>Sustainability Appraisal Scoping Report (2015). Updated in Final SA of the Submission Local Plan – Chapters 3 and Appendix 1.</td>
</tr>
<tr>
<td>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</td>
<td>Sustainability Appraisal Scoping Report (2015). Updated in Final SA of the Submission Local Plan – Chapters 3 and Appendix 1.</td>
</tr>
<tr>
<td>c) The environment characteristics of areas likely to be significantly affected.</td>
<td>Sustainability Appraisal Scoping Report (2015). Updated in Final SA of the Submission Local Plan – Chapters 3 and Appendix 1.</td>
</tr>
<tr>
<td>d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds) and 92/43/EEC (Habitats Directive).</td>
<td>Sustainability Appraisal Scoping Report (2015). Updated in Final SA of the Submission Local Plan – Chapters 3 and Appendix 1.</td>
</tr>
<tr>
<td>e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any</td>
<td>Sustainability Appraisal Scoping Report (2015).</td>
</tr>
</tbody>
</table>
environmental considerations have been taken into account during its preparation.

f) 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, landscapes 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.

g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

i) A description of measures envisaged concerning monitoring in accordance with regulation 17.

j) A non-technical summary of the information provided under the above headings.

Consultation procedures (regulation 13)
As soon as reasonably practicable after their preparation, the draft plan or programme and environmental report shall be sent to the consultation bodies and brought to the attention of the public, who should be invited to express their opinion. The period within which opinions must be sent must be of such length as will ensure an effective opportunity to express their opinion.

Information as to adoption of plan or programme (regulation 16)
As soon as reasonably practicable after the plan or programme is adopted, the consultation bodies, the public and the Secretary of State (who will inform any other EU Member States consulted) shall be informed and the following made available:

- the plan or programme adopted
- the environmental report
- a statement summarising:
  - how environmental considerations have been integrated into the plan or programme;
  - how the environmental report has been taken into account;
  - how opinions expressed in response to:
    - the invitation referred to in regulation 13(2)(d);
    - action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
  - how the results of any consultations entered into under regulation 14(4) have been taken into account;
  - the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and

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In undertaking the SA the Council followed the above legislation as well as guidance set out in the Planning Practice Guidance (PPG), specifically the Sustainability Appraisal Process Flowchart. 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.

Stage A of the SA process was initially undertaken by the SA Scoping Report (SSHA 19) in 2015. However, in acknowledgement of the fact that SA is an iterative process the final SA (MD4, MD7) updates much of the earlier Stage A as part of the process of ongoing monitoring of the baseline situation and characteristics of the District.

As clear from section 1.5 of MD4 - Tandridge Local Plan 2033 Sustainability Appraisal Volume 1 Context, the SA has been an iterative process developed over the course of the subsequent time period to comply with stages B to D of the SA process.

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3 Please see paragraph 013 Reference ID: 11-013-20140306 of the PPG
In relation to Stage D, the SA has been subject to extensive and comprehensive public consultation over the course of its evolution, as set out in the following table. The consultation has informed subsequent stages of the SA.

<table>
<thead>
<tr>
<th>Examination Library Reference</th>
<th>Report / Stage</th>
<th>Publication Date</th>
<th>Date and Details of Consultation</th>
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<tbody>
<tr>
<td>SSHA2, 3, 4 and 5.</td>
<td>Tandridge Local Plan Sustainability Appraisal Regulation 19</td>
<td>July 2018</td>
<td>Published for consultation for 6 weeks, between 9am 30 July 2018 and 5pm, 10 September 2018.</td>
</tr>
</tbody>
</table>

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1.2.9 Section 1.5. of MD4 (Tandridge Local Plan 2033 Sustainability Appraisal Volume 1 Context) has more detail on the above documents.

1.2.10 To conclude, the SA process for the Tandridge Local Plan follows and complies with the consultation stages of the Environmental Assessment of Plans and Programmes Regulations 2004 (as set out in the Strategic Environmental Assessment Regulations requirements checklist and the Sustainability Appraisal Process Flowchart provided within the PPG).

1.2.11 The consultation on the SA is also in conformity with Regulation 18 and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in terms of stages of consultation on local plan documents.

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5 http://www.legislation.gov.uk/uksi/2012/767/regulation/18/made
http://www.legislation.gov.uk/uksi/2012/767/regulation/19/made

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1.3 Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?

Response to Inspector’s Issues / Question

1.3.1 Yes. The assessment methodology is set out in the SA Framework. In Table 3 on page 100 of document ‘MD4 - Tandridge Local Plan 2033 Sustainability Appraisal Volume 1 Context’, the Council has presented the SA Framework. Within this, the Council has outlined the sustainability objectives and the decision aiding questions by which the alternative options of plans will be appraised to make the appropriate plan as sustainable as possible.

1.3.2 This SA Framework has remained consistent throughout the process of producing ongoing SA reports for the Local Plan 2033. It was first presented as part of this process in Appendix 4 of SSHA19 - Sustainability Appraisal Strategic Environmental Assessment Scoping Report 2015. It has also been consistently presented in all other Tandridge Local Plan SA reports, including SSHA2, SSHA12, SSHA13, SSHA16 and SSHA18.

1.3.3 The SA framework used within Tandridge stems from partnership working and predates the current Local Plan process. In 2004, an initial version 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 SA Objectives was established. In summer 2012, and again following the NPPF, the East Surrey authorities6 undertook further joint working to re-consider and refine the objectives. In partnership with the other East Surrey planning authorities the objectives have been revised.

1.3.4 The joint East Surrey SA Objectives were consulted on in April 2015 with the Environment Agency, Natural England, Historic England, Surrey County Council and nearby local planning authorities, which led to the objectives being refined to those presented in the Scoping Report (SSHA 19). SSHA19 was then subject of a further consultation with the statutory consultees and Tandridge District Council’s neighbouring planning authorities, including Surrey County Council and the Greater

6 Tandridge DC; Mole Valley DC; Reigate and Banstead BC; Epsom and Ewell BC; and Spelthorne BC

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London Authority. No amendments were proposed to the SA Objectives or guidance questions from respondents to the consultation and so these were taken forward to the main sustainability appraisals.

1.3.5 Therefore, the development and refinement of the SA Framework represents an exemplary example of partnership cooperative working between local authorities and statutory consultees.

1.3.6 Annex 1 of the SEA Directive lists a number of themes against which Local Authorities should assess their plans to determine the likelihood of significant impacts. To meet the requirements on the SEA Directive, the SA Objectives take account of the themes outlined in the SEA Directive associated with biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, landscape and any interrelationships between them.

1.3.7 The assessment draws on the criteria for determining the likely significance of effects referred to in Article 3(5) of the SEA Directive and presented in Annex II of the Directive.

1.3.8 The objectives were also developed having regard to Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004/25, and the 16 objectives have also been related to NPPF theme.

1.3.9 In applying Annex II of the Directive, Tandridge DC has assessed the extent of significance is expressed by orders of magnitude. Section 4.4 of document MD4 sets out the scoring system of likely impacts. This has been used throughout the SA process to assess the ‘nature of the effect’ on the individual sustainability appraisal (SA) objective of the proposed option the following scoring system has been applied.

1.3.10 It is important to note that neither the PPG, Section 19 & Section 39 of the Planning and Compulsory Purchase Act 2004, nor the Environmental Assessment of Plans and Programmes Regulations 2004 provide a definitive ‘scoring’ methodology. This is down to the individual local planning authority to determine, whilst ensuring the requirements of the aforementioned legislation are met.

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1.3.11 The appraisal process has used the SA Framework (including the decision-aiding questions), background evidence, the review of plans, programmes and policies, and the baseline (including various mapped data sources), to assess each option. Assessments have been undertaken using this empirical evidence and, to a lesser extent, professional judgement.

1.3.12 In accordance with Annex II of the Directive, the SA has considered the duration of effects, their geographic scale and their impact magnitude in terms of probability, duration, frequency, and reversibility.

1.3.13 The Tandridge Local Plan SA has made every endeavour to ensure as robust an assessment as possible. However, limitations to the process are acknowledged within Section 4 of MD4. SA and SEA are concerned with likely significant effects. Many effects will depend on the size and location of development, building design and construction, proximity to sensitive receptors such as wildlife sites, conservation areas, flood risk areas and watercourses, and the range of uses taking place. It is considered that most effects cannot be predicted with absolute certainty, as many impacts depend on the design of development and may be subject to mitigation.

1.3.14 Sustainability Appraisal is a tool for predicting potential significant effects. Prediction of effects is made using an evidence-based approach, but the actual effects may be different from those identified. Prediction of effects inevitably incorporates a judgement based on numerous variables. The assessments are based on the best available information. Every attempt has been made to predict effects as accurately as possible using the information available. The SA Framework is based upon a number of decision-aiding questions which in some cases do not closely relate to one another. For example, consideration of objective 4 may require the decision maker to weigh up the relative merits of proximity to children’s play areas vis-à-vis rail access.

1.3.15 Every attempt has been made to ensure objective and consistent scoring over the process of the SA, whilst acknowledging that SA is inevitably an iterative and evolving process and a degree of fine-tuning of scores reflects that over time. In some cases, applying consistency may simply mean that scores from a previous assessment are deemed to still apply, where nothing significant has changed and the same proposed use is being assessed. In other cases, where significant new evidence has emerged, or the type or scale of the assessed proposal has changed, then a complete re-assessment may be considered appropriate. Inevitably a balance has had to be struck.
between ensuring consistency and objectivity over the course of a three-year process, whilst responding to new significant new evidence.

1.3.16 In conclusion, the Council considers the process to be consistent, robust and in accordance with International and national regulations.
1.4 Has the SA taken into account the reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

Response to Inspector's Issues / Question

1.4.1 Yes. Under the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) the SA should identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme; and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme. Similarly, the PPG notes that SA and SEA are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. The SA of the Tandridge Local Plan has followed the guidance set out in the Planning Practice Guidance (PPG) in terms of how the process should assess alternatives and identify likely significant effects.

1.4.2 The consideration of reasonable alternative options has been embedded in the Tandridge SA throughout the four-year process. Alternative options have consistently been assessed and considered against the sixteen objectives of the SA Framework, which comprehensively cover the themes of the SEA directive and the NPPF economic, social and environmental dimensions. The provision of the decision-aiding questions for each SA Objective, has provided a consistent and coherent framework for assessing, analysing and considering each option and assessment. The SA of the Local Plan considers all of the reasonable alternatives, on a like for like basis, against the coherent framework provided by the 16 SA Objectives and guidance questions, and consistently so from the Issues, Options and Recommendations stage up to the submission of the Local Plan in January 2019, and all stages in between.

1.4.3 The principle ways that alternative options through the SA have been considered are outlined in the following table.

1.4.4 The key matter of Alternative Local Plan / Delivery Strategy Approaches is expanded upon in the Councils Hearing Statement on MIQ 3.2. But in summary, they were first considered in section 1-5 – of the 2015 Issues and Approaches Regulation 18 SA (SSHA18) which considered six alternative options. These were elaborated upon later in the process in SSHA13 - Sustainability Appraisal of Delivery Strategy Approaches Appendix B to Agenda item 5 2017, which added a further five options in addition to the previous six. These were then carried through in Section 5.8 of documents SSHA3

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and MD5. This matter is discussed in more detail in the Council’s Hearing Statement response to question 3.2.

1.4.5 Various options for the overall housing number were assessed in Section 5.4 of SSHA3/MD5.

1.4.6 An SA of individual settlements suitability for growth, in the context of the settlement hierarchy was undertaken in section 5.10 of documents SSHA3 and MD5.

1.4.7 Consideration of alternative sites has been subject to an iterative assessment, initially within SSHA16 - Sustainability Appraisal for Tandridge District Regulation 18 Sites Consultation 2016, and latterly within section 5.11 of documents SSHA3 and MD5. Gypsy and Traveller sites were considered within section 5.20 of documents SSHA3 and MD5. Whilst much of the earlier work remains relevant, the latter SA reports undertook further refinement assessments of alternative sites options and their effects.

1.4.8 SSHA3 and MD5 looked at further options in relation to meeting housing need; such as an SA of Meeting Affordable Housing Need (Section 5.5), the Relationship of New Residential Allocations to Existing Built Form/Settlement Boundaries (Section 5.6) and a consideration of Residential allocations within AONBs (Section 5.7).

1.4.9 Consideration of specific locations for a new settlement (Garden Village/Settlement/Community) began in SSHA16 - Sustainability Appraisal for Tandridge District Regulation 18 Sites Consultation 2016, with Section 4 considering seven ‘concept areas’ – potential locations for a large scale mixed-use development. Subsequently document SSHA12 - Sustainability Appraisal for Tandridge District Regulation 18 Potential Garden Village Locations 2017 broadened the investigation of options to sixteen sites, by this stage termed ‘potential Garden Village Locations’. By 2018, the options were narrowed to a final three potential locations for what was now termed the Garden Community, and these were appraised with section 5.13 of documents SSHA3 and MD5. Additionally, at this stage there was further consideration of principles and components of the new community in section 5.14, mindful that these will be developed in the forthcoming Area Action Plan.

1.4.10 With regards economy and employment, options around the quantum of employment provision were considered in Section 5.9 of documents SSHA3 and MD5, with the two key reasonable options for the economic delivery strategy considered in the same

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section. Potential employment sites were assessed in Section 5.11 of SSHA3 and MD5.

1.4.11 Alternative Policy Approaches including (Economic & Tourism policy, Town Centres, Retail & Leisure, Health & Wellbeing, Design and Safety, environmental Design, Landscape, Biodiversity and Geodiversity, Heritage, Green Belt, Aviation) had been considered in SSHA18 - Sustainability Appraisal 2015 Issues and Objectives Regulation 18 2015. Latterly final policies and alternatives were appraised within documents SSHA3 and MD5 section 5.16 considered the development management policies and 5.17 Town Centre Regeneration policies. In many case the alternative option was simply ‘No Policy’, reflecting the fact that there was considered to be little alternative reasonable option to the Local Plan considering the matter in question. Nonetheless, the positive or negative aspects of particular policy sub-elements options may have been drawn out in the commentary and conclusions of the SA of policies, as well as potential options for mitigation.

1.4.12 Alternative options around issues concerning the Ashdown Forest European Habitats site are given specific consideration in 5.14 documents SSHA3 and MD5, notably mitigation zone options and SANG delivery options.

1.4.13 Given the above, the Council considers that all reasonable alternatives have been considered, and in detail, in terms of strategy, policies and sites for the Submission Local Plan January 2019 (MD5). In summary the SA has thoroughly tested 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. In doing this the Council has demonstrated the reasons the rejected options were not taken forward and ensured that realistic and meaningful alternative options are tested as part of the process, reflecting on potential improvements to the Local Plan.

1.4.14 The PPG states that the SA should only focus on what is needed to assess the likely significant effects of the Local Plan, and the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered appropriate for the content and level of detail in the Local Plan. The Council considers the SA to have amply demonstrated full compliance with paragraph 009 of the PPG.
It also needs to be recognised that the SA findings are not the only factors taken into account when determining a strategy, policy or approach to take forward in a Local Plan. Indeed, there can often be an equal number of positive and/or negative effects identified for each alternative, such that it is not possible to ‘rank’ them based on sustainability performance in order to select a preferred approach. Factors such as deliverability are also taken into account by plan-makers when selecting preferred Policies and/or approaches for their plan. It is also notable that consideration of Green Belt does not fall within the consideration of the objectives agreed by the East Surrey authorities and finalised in 2015. Hence, the ‘scoring’ system within the Tandridge Local Plan SA process is not used in isolation to identify the final policy, strategy or site outcome.

The Council will undertake further SA of the modifications to the Plan, should they be agreed by the Inspector. It should be noted that in accordance with case law, particularly Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government, Wealden District Council and South Downs National Park Authority [2014] EWHC 406 and Ashdown Forest Economic Development LLP v Wealden District Council & anor [2015] EWCA Civ 681, changes to the SA Report of a Local Plan can be made up until submission and through the examination process.

**Evidence**

MD4 - Tandridge Local Plan 2033 Sustainability Appraisal Volume 1 Context  
MD5 - Tandridge Local Plan 2033 Sustainability Appraisal Volume 2 Options Assessment 2019  
MD6 - Tandridge Local Plan 2033 Sustainability Appraisal Volume 3 Effects and Conclusions 2019  
MD7 - Tandridge Local Plan 2033 Sustainability Appraisal Appendices 2019  
SSHA2 - Tandridge Local Plan Sustainability Appraisal Regulation 19 Stage Volume 1 Context 2018  
SSHA3 - Tandridge Local Plan Sustainability Appraisal Regulation 19 Stage Volume 2 Options Assessments 2018  
SSHA4 - Tandridge Local Plan Sustainability Appraisal Regulation 19 Stage Volume 3 Effects and Conclusions 2018

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SSHA5 - Tandridge Local Plan Sustainability Appraisal Regulation 19 Stage Appendices 2018
SSHA12: The SA (Regulation 18) - Potential Garden Village Locations (August 2017)
SSHA13 - Sustainability Appraisal of Delivery Strategy Approaches Appendix B to Agenda item 5 2017
SSHA 16: The SA 'Sites Consultation' (Regulation 18) Report (October 2016)

Supporting Paper

None
Habitats Regulations Assessment

1.5 Has the Habitats Regulations Assessment been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 and the People over Wind & Sweetman v Coillte Teoranta judgement C-323/17?

Response to Inspector's Issues / Questions

1.5.1 In April 2019 the Inspector asked the Council\(^8\) an initial question:

\emph{Would the Council confirm whether the Habitats Regulation Assessment (dated August 2018) took into account the Judgement of the European Court of Justice (C-323/17 People over Wind, Peter Sweetman v Coillte Teoranta). Also, whether Natural England made a formal response in respect of the HRA.}

1.5.2 The Council’s response to this question is set out within Examination document TED02 and continues to be be applicable to the latest question MIQ 1.5.

1.5.3 In addition, the Inspector can take further reassurance that all conclusions within the TDC HRA have effectively been endorsed in other plans, such as:

- Ashdown Forest in respect of Air Quality – see South Downs National Park Authority Local Plan (Adopted July 2019)
- Ashdown Forest in respect of Recreation – see Mid-Sussex District Plan 2014-31 (Adopted March 2018)
- Mole Gap to Reigate Escarpment in respect of Recreation, Hydrology and Air Quality – see Reigate & Banstead Development Management Plan\(^9\).

Evidence

SSHA7 - Habitats Regulation Assessment for the Tandridge Local Plan 2033 and Garden Community 2018

SSHA11 - Habitat Regulations Assessment Stage 1 Screening Including Garden Village Options 2017

\(\text{ID3 - Further Inspector Question (HRA vs Sweetman) (April 2019)}\)

\(\text{Latest Plan update is that the Inspectors Report concludes that the Plan is sound and legally compliant subject to main mods. Council expect to adopt in September 2019. http://www.reigate-banstead.gov.uk/info/20381/emerging_planning_policy/888/development_management_plan}\)

Document Reference TED03:
Tandridge District Council Hearing Statement Matter 1

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SSHA15 - Habitat Regulations Assessment Stage 1 Screening Update 2016
SSHA17 - Habitat Regulations Assessment Stage 1 Screening 2015
TED02 – Response to Inspector Documents ID2 and 3

Document Reference TED03:
Tandridge District Council Hearing Statement Matter 1
Local Development Scheme

1.6 Is the Plan compliant with the Council’s Local Development Scheme in terms of its form, scope and timing?

Response to Inspector’s Issues / Question

1.6.1 Yes. As required by section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011), examination document OTH2 (Local Development Scheme, December 2018), presents the most up to date iteration of the Council’s Local Development Scheme (LDS) and programme against which documents which form the Council’s Local Plan, will be prepared. OTH2 was considered and adopted by the Council’s Planning Policy Committee in December 2018.

1.6.2 The Council has consistently ensured that an up to date LDS has been prepared, adopted and published on the Council’s website since the decision to review the Council’s adopted Core Strategy, was taken in 2008. The first mention of the Council’s preparation of the Local Plan was through the Local Development Scheme 2013. Further updates which reflect the Council’s progress in preparing its plan were subsequently considered and adopted by the Council’s Planning Policy Committee and published on the Council’s website in: December 2015, June 2016, June 2017 and March 2018.
1.7 Has the Council complied with the requirements of section 19(3) of the 2004 Act and Regulations 18 and 19 of the Town and Country Planning (Local Planning (England) Regulations 2012 with regard to conducting consultation in accordance with their statement of community involvement?

Response to Inspector’s Issues / Question

1.7.1 Yes. As required by Regulation 18 of the Planning and Compulsory Purchase Act 2004, the Council prepared, adopted and published a Statement of Community Involvement in September 2015. This document is included within the examination library as document reference: MD15.

1.7.2 In preparing the Local Plan, MD15 has guided and informed the way in which all stages of consultation on the Local Plan, has been conducted. Following the completion and analysis of each stage of consultation, statements of consultation were prepared and published and set out how consultation was conducted, who was consulted, the headline findings and next steps. All statements of consultation form part of the examination library and are included as document reference: MD3, SCON1, SCON3 and SCON5.

Document Reference TED03:
Tandridge District Council Hearing Statement Matter 1
1.8 Are the policies of the Plan designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change in accordance with Section 19(1A) of the Act?

Response to Inspector’s Issues / Question

1.8.1 Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to include in their Local Plans “policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change”. The test in section 19(1A) is explicitly against the LP “taken as a whole”, and the whole plan must “include” policies which comply with the other requirements of section 19(1A).

1.8.2 This aim of ‘Mitigating and adapting to the impacts of climate change where possible and promoting development which is environmentally resilient’ is explicit both in the Local Plan’s Spatial Objectives and in the Sustainabily Appraisal framework objectives which have informed the Plan.

1.8.3 As noted in the PPG, ‘effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases’ with the location of development being a key component of this. The distribution and design of new development and the potential for servicing sites through sustainable transport solutions, are particularly important considerations that affect transport emissions. Similarly, paragraph 95 of the NPPF notes that ‘to support the move to a low carbon future, local planning authorities should: plan for new development in locations and ways which reduce greenhouse gas emissions’.

1.8.4 The Local Plan responds to this by a clear commitment to only develop in accessible and sustainable locations which will reduce the need to travel and associated emissions as far as possible. This is implicit in the Spatial Development Strategy (Policy TLP01) where, in the short to medium term development is directed towards the most sustainable settlements which are the most built-up urban (Urban - Tier 1) and semi-rural service settlements (Tier 2). These settlements can demonstrate connections to key services and public transport networks as demonstrated in the supporting Settlement Hierarchy documents (SBC1 and SBC8).
1.8.5 Equally, the plan has refrained from allocating development to lower-tier settlements since it is considered that this would lead to unacceptable and unsustainable patterns of transport and services use together with associated emissions. It is considered that this would be contrary to both the requirements of Section 19(1A) of the Act, the aims of Climate Change Act 2008, as well as the Council’s own Local Plan and SA objectives.

1.8.6 For the longer term and beyond the Plan period, it is necessary to look beyond existing settlements. Therefore, new homes will be delivered through the development of the South Godstone Garden Community. The site has potential low carbon energy opportunities, in particular the Waste Local Plan allocation at nearby Lambs Business Park\(^{10}\). The site also has a train station at the heart of the settlement. As such this is the option that is best placed to contribute to the key aim of mitigating and adapting to climate change. As part of the forthcoming Area Action Plan (AAP), the Plan commits to designing a self-sustaining community which is resilient to changing climates and flooding. The design of the development will ensure homes and other buildings are designed to the highest aesthetic and efficient quality which embraces zero-carbon and energy efficient technologies.

1.8.7 Policy TLP50 further underlines the Council’s commitment to developing well-integrated communities with sustainable transport which connects people to jobs, services and community facilities via promotion of cycling and walking, public transport and electric vehicle infrastructure.

1.8.8 The PPG notes that the impact of climate change needs to be taken into account in a realistic way. In doing so, local planning authorities will want to consider: identifying no or low-cost responses to climate risks that also deliver other benefits, such as green infrastructure that improves adaptation, biodiversity and amenity.

1.8.9 Green infrastructure can contribute to carbon storage, cooling and shading, opportunities for species migration to more suitable habitats and the protection of water quality and other natural resources. It can also be an integral part of multifunctional sustainable drainage and natural flood risk management. (PPG Paragraph: 006 Reference ID: 8-006-20190721. Revision date: 21 07 2019).

\(^{10}\) See the Council’s Hearing Statement in relation to MIQ 8.44 in relation to the low-carbon energy opportunity offered by the Lambs site.

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1.8.10 Within the South Godstone Garden Community a single area of 100ha of natural green infrastructure is required, in accordance with Natural England's ANGST Standards. More details are contained in Policy SGC01, and cross-referenced in Policy TLP30, which also requires general District-wide measures to provide green infrastructure.

1.8.11 Supporting national commitments to reduce CO² emissions, Policy TLP44: Renewable Energy Infrastructure states that proposals for renewable and low carbon energy schemes will be positively considered, subject to location and constraints.

1.8.12 Policy TLP45 (Energy Efficient and Low Carbon Development) stipulates that new development will be supported where all reasonable steps have been taken to integrate low and zero carbon mechanisms in the design and layout of the proposed development, and ensure the reduction of energy consumption by the end users. Innovative design in all developments and community-led renewable energy schemes for low and zero carbon developments which can demonstrate direct community benefit will be encouraged. The Council also commits to preparing a best practice guidance Sustainable Design SPD as part of this policy.

1.8.13 Implementation of air quality conditions in line with the latest requirements of the Surrey Air Alliance, Local Transport Plan and its supporting Low Emissions Transport and Electric Vehicle Strategies will also be beneficial to climate change objectives, as well as human health. These matters are addressed in Policy TLP46.

1.8.14 Development has been steered to areas at lowest risk from flooding from all sources through the site selection process. This is reflected by Policy TLP47 which requires development to account for the impacts of future climate change.

1.8.15 Policy TLP48 (Water Consumption and Waste Water) requires all new homes are required to meet the water efficiency standard of 110 litres/person/day. This is in direct response to the South East being identified as an area of 'water stress' through the Environment Agency report 'Water Stressed Areas: Final Classification' (2013) which bases its findings upon both current and future water usage whilst factoring in climate change scenarios. The policy also adapts to climate change by promoting water efficiency and protecting water quality. It stipulates that creative design which integrates rainwater harvesting and/or re-purposing and grey water recycling will be viewed positively.
1.8.16 In conclusion, it is considered that the policies within the Plan acting in combination have positively embraced the statutory duty to tackle climate change and its impacts.

Evidence

EC04 – Tandridge Local Plan 2033 Air Quality Impact Assessment Specific attention on the Garden Village Schemes 2018
MD3 – Our Local Plan 2033 Regulation 22 Statement of Consultation 2019
MD4 - Tandridge Local Plan 2033 Sustainability Appraisal Volume 1 Context
MD5 - Tandridge Local Plan 2033 Sustainability Appraisal Volume 2 Options Assessment 2019
MD6 - Tandridge Local Plan 2033 Sustainability Appraisal Volume 3 Effects and Conclusions 2019
MD7 - Tandridge Local Plan 2033 Sustainability Appraisal Appendices 2019
MD15 – Tandridge Statement of Community Involvement 2015
OTH2 – Local Development Scheme 2018
OTL2 Open Space Study 2017
SBC1 Settlement Hierarchy Addendum 2018
SBC8 Settlement Hierarchy Addendum 2015
SCON01 – Statement of Consultation Local Plan Garden Villages Consultation Regulation 18 2018
SCON03 – Statement of Consultation Local Plan Sites Consultation Regulation 18 2017
SCON05 – Statement of Consultation Local Plan Issues and Approaches Consultation Regulation 18 2016
SSHA12 – Sustainability Appraisal for Tandridge District Regulation 18 Potential Garden Village Locations 2017
SSHA13 – Sustainability Appraisal of Delivery Strategy Approaches Appendix B to Agenda item 5 2017
SSHA16 – Sustainability Appraisal for Tandridge District Regulation 18 Sites Consultation 2016
SSHA18 – Sustainability Appraisal 2015 Issues and Objectives Regulation 18 2015
SSHA19 – Sustainability Appraisal Strategic Environmental Assessment Scoping Report 2015
WTR1 – Flood Risk Sequential and Exception Test 2019
WTR2 – Tandridge District Water Cycle Study Phase 3 2018

Document Reference TED03:
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WTR3 – Tandridge District Level 2 Strategic Flood Risk Assessment 2018

WTR4 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Tables Appendix A 2018

WTR5 – Tandridge District Level 2 Strategic Flood Risk Assessment Catchment Summary Tables Appendix C 2018

WTR6 – Tandridge District Level 2 Strategic Flood Risk Assessment Garden Community Summary Tables Appendix C 2018

WTR7 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix D CAT 007 Map 2018

WTR8 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Caterham and Whyteleafe Map 2018

WTR9 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Caterham on the Hill Map 2018

WTR10 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix E Smallfield Map 2018

WTR11 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F Blindley Heath Map 2018

WTR12 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F Redhill Aerodrome Map 2018

WTR13 – Tandridge District Level 2 Strategic Flood Risk Assessment Detailed Site Summary Table Appendix F South Godstone Map 2018

WTR14 – Water People Places Guidance for Master Planning Sustainable Drainage 2018

WTR15 – Tandridge District Water Cycle Study Phase 2 Outline Study 2018

WTR16 – Tandridge District Water Cycle Study Phase 2 Appendix A Site Tracker Spreadsheet 2018

WTR17 – Tandridge District Water Cycle Study Phase 2 Appendix B Water Quality Assessment 2018

WTR19 – Level 1 Strategic Flood Risk Assessment 2017

WTR20 – Strategic Flood Risk Assessment Level 1 Appendix A Index Grid 2017

WTR21 – Strategic Flood Risk Assessment Level 1 Appendix B Principal Watercourses 2017

WTR22 – Strategic Flood Risk Assessment Level 1 Appendix C Areas at Risk of Flooding from Rivers Flood Zone Mapping 2017

WTR23 – Strategic Flood Risk Assessment Level 1 Appendix D Climate change impact on fluvial flood risk 2017

WTR24 – Strategic Flood Risk Assessment Level 1 Appendix E Risk of Flooding From Surface Water 2017

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WTR25 – Strategic Flood Risk Assessment Level 1 Appendix F Areas at Risk of Ground Water Flooding 2017

WTR26 – Strategic Flood Risk Assessment Level 1 Appendix G Flood Alert and Flood Warning Areas 2017

WTR27 – Strategic Flood Risk Assessment Level 1 Appendix H Areas with Recorded Flood Events 2017

WTR28 – Strategic Flood Risk Assessment Level 1 Appendix I Areas with Recorded Incidents of Sewer Flooding 2017

WTR29 – Strategic Flood Risk Assessment Further Details for Tandridge District 2016

WTR30 – Strategic Flood Risk Assessment 2015

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### Neighbouring and Adjoining Local Planning Authority Plan Making Position April 2019

Note: Based on best information available / TDC interpretation

<table>
<thead>
<tr>
<th>LPA</th>
<th>Adopted LP</th>
<th>Current Emerging LP Position</th>
<th>Latest demog. OAN based on 10 years from 2019 dpa 2016 projection based (2014 comparator)</th>
<th>Latest OAN including market signals additions dpa (MS addition = %)</th>
<th>Adopted plan requirement dpa (total)</th>
<th>Emerging plan provision dpa (total)</th>
<th>Standard Method need calculation – unadjusted for plans 2019</th>
<th>2018 position</th>
<th>HDT</th>
<th>SCG for LP Y/N (state in place / draft)</th>
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<tr>
<td><strong>TDC (comparator figures)</strong></td>
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<tr>
<td>Reigate &amp; Banstead (Surrey)</td>
<td>Core Strategy 2008. Adopted 10.08</td>
<td>Draft Our Local Plan 2013 Period 2013-33= 20yrs Submission / Examination commenced January 2019</td>
<td>331 (463) For emerging LP period = 332 (470) 398 (7960) (MS addition = +20%)</td>
<td>125 (2,500) Based on RSS</td>
<td>303 (6060)</td>
<td>648</td>
<td>65% = Buffer / Action Plan</td>
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<td>Sevenoaks (Kent)</td>
<td>Core Strategy Development Plan.</td>
<td>Draft Local Plan at Examination</td>
<td>540 (820) 600 – 640 (9000 – 9600) (MS addition = +0%) 640 (9,600) (Max figure – but ranged – based on 2011 census)</td>
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<td>707 94% Action Plan</td>
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**Document Reference TED03:**
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<th>Location</th>
<th>Plan Type</th>
<th>Adopted</th>
<th>Period</th>
<th>Local Plan Review</th>
<th>Baseline</th>
<th>Baseline +20% MS</th>
<th>New Plan at Examination 2019</th>
<th>Baseline +20% MS + MS</th>
<th>New Plan at Examination 2019 + MS</th>
<th>Baseline +20% MS + MS + MS</th>
<th>Action Required</th>
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<td>Crawley (West Sussex)</td>
<td>MS District Plan</td>
<td>02.11</td>
<td>2006-26 = 20 yrs</td>
<td>Local Plan Review</td>
<td>320 (570)</td>
<td>752 (+32% MS)</td>
<td>New Plan at Examination 2019</td>
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<td>New Plan at Examination 2019 + MS</td>
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<td>2014-31 = 17 yrs</td>
<td>Allocations plan in preparation</td>
<td>626 (714)</td>
<td>Baseline 876 (+20% MS)</td>
<td>New Plan at Examination 2019</td>
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<td>Wealden (East Sussex)</td>
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<td>848 (879)</td>
<td>950 (14,250) + MS</td>
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<td>472 (9440)</td>
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