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

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INSPECTOR’S INITIAL MATTERS, ISSUES AND QUESTIONS

Following my initial reading of the Tandridge District Council ‘Our Local Plan:2033’ (the Plan) (Publication version July 2018), the supporting evidence and the representations, I have identified the matters and issues and have posed the key questions for the examination. These are set out in this document.

Please read and be familiar with the accompanying Inspectors Guidance Note which sets out important details of the organisation and conduct of the Examination and the hearings, and regarding the preparation of hearing statements. I shall assume that the Guidance Note has been read by participants at the Hearings.

The National Planning Policy Framework 2012 (the Framework) in paragraph 182 makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised Framework was published in July 2018 and subsequently updated in February 2019. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 Framework will apply. All references to the Framework mean the Framework 2012 unless otherwise stated. All references to the Planning Practice Guidance (PPG) mean the PPG in place immediately prior to the publication of the update to the Framework in July 2018.

Any reply to my questions should be sent to the Programme Officer as follows; For Matters 1, 2, 3, 4, 5 and 6 they must be received no later than 4.00 pm on 6 September 2019. For matters 7 and 8, they must be received by 4.00 pm on 13 September 2019.
Matter 1: Procedural/legal requirements

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

**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?

**Sustainability Appraisal**

1.2 Is the Sustainability Appraisal (SA) adequate?
1.3 Has the SA been undertaken on the basis of a consistent methodology and is the assessment robust?
1.4 Has the SA taken into account the reasonable alternatives and has sufficient reasoning been given for the rejection of alternatives?

**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?

**Local Development Scheme**

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

**Community Involvement**

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?
Climate Change

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?

Matter 2: The provision of housing

A: Calculation of the Objectively Assessed Need for Housing (OAN)

Issue: Is the basis for establishing the OAN for Tandridge consistent with national policy and guidance?

2.1 Is the preparation of the SHMA on the basis of a Housing Market Area (HMA) defined for Tandridge District justified? Is the definition of the HMA consistent with the Planning Practice Guidance?

2.2 Is the use of the 2016 based household projections justified in calculating the OAN for the District and is it consistent with the Planning Practice Guidance?

2.3 Is the 20% Market Signals adjustment justified?

2.4 Is the approach to defining affordable housing needs justified?

2.5 Are the assumptions made in respect of employment growth realistic?

2.6 Are there other relevant factors to be taken into account in calculating the OAN?

B: The housing requirement

Issue: Is the plan positively prepared and justified given that the Plan provides for 6,056 homes in the Plan period, against the OAN of 9,400 as set out in the Publication Plan and the OAN of 7,960 set out in the document Updating the Objectively Assessed Housing Needs of Tandridge (HNS5)?

2.7 Is the Plan justified in not meeting the full OAN for Tandridge and is it consistent with paragraph 14 of the Framework?

2.8 Have all realistic options for meeting the OAN within Tandridge in full been exhausted?

2.9 What are the consequences of not meeting the OAN within the HMA for delivering a wide choice of high-quality homes, widening opportunities for
home ownership and creating sustainable, inclusive and mixed communities which meet the needs of different groups in the community?

2.10 Would and/or where would any unmet housing need arising in the Tandridge HMA during the Plan period be met?

C: The overall supply of housing

**Issue: Is the proposed supply of housing for the Plan period realistic?**

2.11 Does the housing trajectory set out in the Housing Topic Paper (HNS2) provide a sound basis for meeting the identified housing need?

2.12 Is the housing trajectory realistic and deliverable in terms of its components and are there any threats to delivery?

2.13 Is the contribution towards housing supply of housing from windfall, town centre initiatives and the predicted supply of 20 vacant dwellings per annum being brought back into use realistic and justified?

2.14 Is it justified that HSG20; North Tandridge: One Public Estate (NTOPE), Caterham is included in the housing trajectory?

2.15 In broad terms, is the housing development proposed in the Plan and set out in the trajectory based on a sound understanding and robust evidence of viability?

2.16 Given that the proposed South Godstone Garden Community is intended to deliver around 1,400 new homes in the Plan period and the details of the development would be considered by an Area Action Plan (AAP), would it be effective to include within the Plan a Policy which commits the Council to a review of the Plan if the AAP is not adopted by a specified date in order to sustain the supply of housing?

D: Five year housing land supply

**Issue: Would the Plan secure a five year supply of deliverable housing sites?**

2.17 Will the Plan provide for a five year supply of deliverable housing sites on adoption?

2.18 In the context of paragraph 47 of the Framework, is it justified to apply a buffer of 5% within the calculation of the five year supply?

2.19 What are the implications of the Housing Delivery Test for the five year supply of housing after the Plan is adopted, having regard to the

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application of the appropriate buffer as set out in paragraph 73 of the revised updated National Planning Policy Framework 2019?

E: TLP:12 Affordable Housing Requirement

**Issue: Is the OAN for affordable housing justified and in line with national policy and guidance?**

2.20 Does the SHMA's approach to calculating affordable housing need, comply with the stages set out in the Planning Practice Guidance?

2.21 Policy TLP12 sets affordable housing requirements for developments within the Tiers 1 and 2 of the settlement hierarchy, in respect of sites released from the Green Belt and elsewhere. Would the policy be effective in ensuring the OAN for affordable housing is met?

Considerations include:

- Are the affordable housing requirements set at levels which maximise the delivery of affordable housing whilst not affecting the deliverability and viability of the Plan?
- Is there a need to increase the housing requirement to help deliver more affordable housing?
- What is the justification for the 15 dwellings or over threshold in Tier 1 settlements?
- Is the policy justified in applying the affordable housing requirement to housing sites of five dwellings and over outside of Tier 1 and Tier 2 settlements and sites allocated as Green Belt Releases and is it consistent with national policy set out in the Written Ministerial Statement (WMS) of 28 November 2014 and the Planning Practice Guidance (031 Reference ID: 23b-031-20160519) on support for small-scale developers, custom and self-builders (or the Framework 2019)?
- The Policy states that the tenure and size split will be determined by the Council’s most up to date Housing Strategy. Is the Policy, in requiring compliance with the Housing Strategy consistent with national policy given that the Housing Strategy is not part of the development plan?

2.22 Are the proposed Modifications to Policy TLP12 necessary for soundness?
F: Provision for Gypsies, Travellers and Travelling Showpeople

**Issue: Is the Plan positively prepared and would it be effective in addressing the likely accommodation needs of Gypsies, travellers and travelling showpeople?**

2.23 Has the need for additional pitches and plots been robustly calculated and has provision of pitches and plots changed since the Tandridge District Council Gypsy and Traveller Accommodation Assessment (GTAA) was undertaken?

2.24 Will a five year supply of specific deliverable sites for gypsies, travellers and travelling showpeople be provided on adoption of the plan?

2.25 Given the identified need in the GTAA for plots and pitches in the first five years of the plan period, is it justified to make specific provision only through the proposed South Godstone Garden Community, which is not anticipated to deliver homes until the later part of the plan period and would this address identified needs? To be positively prepared, should the Plan make provision for the identified need for additional pitches and plots through one or more site allocations?

2.26 Given that much of the District is within the Green Belt, would a reliance upon criteria based policy and allocation through the AAP be positively prepared and effective in meeting the identified need? To be effective, should Policies TLP15 and TLP16 also address proposals in the Green Belt?

2.27 Are Policies TLP15 and TLP16 justified and consistent with National Policy?

**TLP15: Gypsy, Traveller and Showpeople Provision**

2.28 Is the requirement that the applicant should clearly demonstrate need in criterion II consistent with the Planning Policy for Traveller Sites and does it accord with the Public Sector Equality Duty when proposals for general housing do not need to demonstrate need?

2.29 Should the Policy cross reference TLP47 in respect of flood risk?

**TLP16: Traveller Pitch/Plot Design**

2.30 Would TLP16 be effective and consistent with national policy through referring to the withdrawn Good Practice Guidance?

2.31 Would the Policy criteria be effective in achieving good design?

2.32 Is it necessary to include criterion V given that contaminated land is covered within TLP15? Would criterion V be effective as it does not seek that a contaminated site is remediated prior to occupation?
Matter 3 The Spatial Strategy

**Issue: Is the spatial strategy and settlement hierarchy as set out in Policies TLP01, TLP06, TLP07, TLP08 and TLP09 justified as the most appropriate strategy and is it based on robust evidence?**

3.1 Have all realistic options for the distribution of development within the District been identified and considered robustly in the formulation of the Plan?

3.2 Is the proposed distribution of housing and other development supported by the Sustainability Appraisal, and will it lead to the most appropriate pattern of housing growth?

3.3 Is the distribution of new homes between the Tiers of settlements and proposed garden community justified and how has it been established?

**Spatial Strategy Policy wording**

**TLP06: Urban Settlements**

3.4 Is the Policy effective and consistent with national policy in requiring accordance with the Council's Infrastructure Delivery Plan which is not a development plan document?

3.5 Are the proposed Modifications necessary for soundness?

**TLP07: Semi-Rural Service Settlements**

3.6 Is the Policy effective and consistent with national policy in requiring accordance with the Council's Infrastructure Delivery Plan which is not a development plan document?

3.7 Are the proposed Modifications necessary for soundness?

**TLP08: Rural settlements**

3.8 Is the Policy sufficiently clear and would it be effective in respect of Woldingham which is inset, in part, from the Green Belt?

3.9 Are the criteria set out in A) consistent with Green Belt policy as set out in paragraph 89 of the Framework and are they justified?

3.10 Is the Policy effective and consistent with national policy in requiring accordance with the Council's Housing Strategy which is not a development plan document?

3.11 Are the proposed Modifications necessary for soundness?
TLP09: Limited and Unserviced settlements

3.12 Are the second and third bullet points consistent with paragraph 90 of the Framework in not taking into account the preservation of openness and the purposes of including land in the Green Belt?

3.13 To be effective, should the Policy state ‘made’ Neighbourhood Plan rather than ‘adopted’?

Matter 4 Green Belt boundary alterations

Issue: Is the Green Belt Assessment consistent with national planning policy for Green Belts, is it based upon appropriate criteria and is it adequate and robust?

4.1 Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?

4.2 In terms of paragraph 84 of the Framework, have the proposed alterations to the Green Belt boundaries taken account of the need to promote sustainable patterns of development and are they consistent with the Local Plan strategy?

4.3 Have all realistic alternatives to releasing land from the Green Belt been considered, such as further development in the urban area or increasing development densities, and would the most efficient use of land proposed for release from the Green Belt be made?

4.4 Is the site selection methodology for sites to be released from the Green Belt robust and are the proposed alterations to the Green Belt boundaries justified?

4.5 In overall terms, are there exceptional circumstances for the proposed alterations of the boundaries of the Green Belt, to accommodate the level of development proposed?

4.6 In overall terms, are the proposed boundaries of the Green Belt defined clearly and would they be likely to be permanent or capable of enduring beyond the plan period?
Matter 5 Employment land provision

**Issue: Is the plan positively prepared and would it be effective in providing for enough employment land to meet objectively assessed needs?**

5.1 Does the provision of employment land set out in Policy TLP01 take into account any future loss of B1 floorspace as a result of permitted development rights and is the amount of land for B-Use Class employment land justified?

5.2 Will the provision of the employment land proposed improve the ‘self containment’ of the District in terms of the commuting patterns of residents?

**TLP20: Supporting a Prosperous Economy**

5.3 Is the Policy positively prepared and consistent with national policy in stating that proposals for development that would result in the loss of employment land will not normally be supported? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

5.4 Is it justified and consistent with national policy that proposals need to show that the redevelopment of the site for residential purposes is identified through the Council’s most up to date brownfield register and is in line with the most up to date Infrastructure Delivery Plan given that these are not part of the development plan?

5.5 Are the proposed Modifications necessary for soundness?

**TLP21: Employment Hierarchy**

5.6 Is it justified and consistent with national policy that proposals will be considered in accordance with the Council’s most up to date Economic Needs Assessment and Economic Proposition given that these are not part of the development plan?

Matter 6 South Godstone Garden Community and housing allocations

**SCG01: South Godstone Garden Community**

**Issue: Is the policy for the allocation of a broad location for a Garden Community at South Godstone justified, effective and consistent with national policy?**

6.1 Is the approach that the specific details of the proposed Garden Community would be determined through an Area Action Plan (APP)
effective and is it clearly justified to address these matters in an additional development plan document?

6.2 Was the broad location for the proposed Garden Community selected on a robust basis?

6.3 Is the proposed broad location in a suitable location for housing development?

6.4 How was the proposed broad location defined and is the defined extent justified?

6.5 How has the identification of the proposed broad location taken into account the significance of designated and non-designated historic heritage assets. Where is the evidence that the Council has identified and assessed the particular significance of heritage assets within or outwith the defined area of search where their significance may be harmed through development within their settings?

6.6 Is there evidence that land within the proposed broad location would not be available for development?

6.7 Is there sufficient evidence in regard to possible infrastructure requirements to suggest that there is a reasonable prospect that homes could be built at the proposed Garden Community in the Plan period as set out in the Plan’s trajectory? Points to consider include:

- Any necessary improvements to Junction 6 of the M25;
- Any necessary improvements to the A22;
- Any necessary improvements to South Godstone Railway Station;
- Whether the infrastructure requirements have been sufficiently considered and costed so as to inform the high-level viability of the proposal?
- Whether there are any infrastructure requirements which would mean that the site could not be viably developed at the point envisaged?

6.8 When would the proposed Garden Community realistically deliver the first homes? What is the realistic rate of delivery which should be assumed?

6.9 Given the affordable housing need identified for the HMA, is it effective to leave the definition of a target for affordable housing to the AAP?

6.10 Are the proposed Modifications necessary for soundness?
Housing allocations

**Issue:** Are the proposed housing allocations justified, effective and consistent with national policy?

**HSG01: Land at Plough Road and Redehall Road, Smallfield**

6.11 What are the exceptional circumstances for the release of the site from the Green Belt?

6.12 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

6.13 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework? Would the requirement to explore opportunities for junction improvements at Plough Road/Redehall Road/Chapel Road/Wheelers Lane be effective and is it justified? Is it effective to require the provision of amenity green space in accordance with the 'most up to date open space assessment' when it is not part of the development plan?

6.14 Are there any matters which would mean that the site should not be considered to be deliverable or developable as per footnotes 11 and 12 to the Framework?

6.15 Are the proposed Modifications necessary for soundness?

**HSG02: Chapel Road, Smallfield**

6.16 In terms of flood risk, is the allocation of the site justified in respect of the Sequential Test and the Exceptions Test? Has it been demonstrated that a housing development at the site would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?

6.17 Are there any constraints which would mean that the site should not be considered to be deliverable or developable as per footnotes 11 and 12 to the Framework?

6.18 Are the requirements for financial contributions consistent with national policy for planning obligations and conditions as set out in the Framework?

6.19 Are the proposed Modifications necessary for soundness?

**HSG03: Land North of Plough Road, Smallfield**

6.20 What are the exceptional circumstances for the release of the site from the Green Belt?
6.21 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

6.22 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework? Would the requirement to explore opportunities for junction improvements at Plough Road/Redehall Road/Chapel Road/Wheelers Lane be effective and is it justified? Is it justified to seek a financial contribution to Plough Field Park Youth provision?

6.23 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.24 Are the proposed Modifications necessary for soundness?

**HSG04: Woodlands Garage, Chapel Road, Smallfield**

6.25 In terms of flood risk, is the allocation of the site justified in respect of the Sequential Test and the Exceptions Test? Has it been demonstrated that a housing development at the site would be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere?

6.26 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.27 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework?

6.28 Are the proposed Modifications necessary for soundness?

**HSG05: Sandiford House, 40 Stanstead Road, Caterham**

6.29 Would the proposed allocation give rise to a net increase in homes?

6.30 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.31 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework?

6.32 Are the proposed Modifications necessary for soundness?

**HSG06: Land off Salmons Lane West, Caterham**

6.33 What are the exceptional circumstances for the release of the site from the Green Belt?
6.34 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

6.35 What is the significance of the heritage assets at the former RAF Kenley Aerodrome? Where is the evidence that the potential effect on the heritage assets or their settings which may result from the proposed development has been assessed?

6.36 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

6.37 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.38 Are the proposed Modifications necessary for soundness?

**HSG07: Coulsdon Lodge, Coulsdon Road, Caterham**

6.39 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.40 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

6.41 Are the proposed Modifications necessary for soundness?

**HSG08: 156-180 Whyteleafe Road, Caterham**

6.42 In character and appearance terms, would a site access from Whyteleafe Road be justified?

6.43 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.44 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

6.45 Are the proposed Modifications necessary for soundness?

**HSG09: Land at Fern Towers, Harestone Hill**

6.46 Would the loss of the garages and the redevelopment of the site give rise to unacceptable parking stress in the surrounding area?

6.47 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.48 Are the proposed Modifications necessary for soundness?
HSG10: William Way Builders Merchant, 38-42 High Street, Godstone

6.49 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.50 Are the proposed Modifications necessary for soundness?

HSG11: Land to the West of Godstone

6.51 What are the exceptional circumstances for the release of the site from the Green Belt?

6.52 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

6.53 Is the Policies Map in respect of the boundary of the Surrey Hills Area of Outstanding Natural Beauty (AONB) correct?

6.54 Does the allocation constitute major development within the AONB?

6.55 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework, and are they justified?

6.56 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.57 Are the proposed Modifications necessary for soundness?

HSG12: Land at the Old Cottage, Station Road, Lingfield

6.58 What are the exceptional circumstances for the release of the site from the Green Belt?

6.59 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

6.60 What is the evidence that the potential effect on the significance of the heritage assets or their settings which may result from the proposed development has been assessed?

6.61 Would criterion IV. Landscape be effective in safeguarding the character and appearance of Lingfield?

6.62 In terms of flood risk, is the proposed allocation of the site justified in respect of the Sequential Test? Would the allocation be effective in ensuring that inappropriate development in areas at risk of flooding are avoided?

6.63 What account has been taken of the emerging Lingfield Neighbourhood Plan in framing the proposed allocation?
6.64 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework, and are they justified?

6.65 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.66 Are the proposed Modifications necessary for soundness?

**HSG13: Land West of Red Lane, Hurst Green**

6.67 What are the exceptional circumstances for the release of the site from the Green Belt?

6.68 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

6.69 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

6.70 Is the text under ‘Strategic Opportunity’ justified, effective or necessary? Does the policy provide a clear indication of how a decision maker should react to a development proposal?

6.71 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.72 Are the proposed Modifications necessary for soundness?

**HSG14: Warren Lane Depot, Hurst Green**

6.73 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework, and are they justified?

6.74 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.75 Are the proposed Modifications necessary for soundness?

**HSG15: Land West of Limpsfield Road, Warlingham**

6.76 What are the exceptional circumstances for the release of the site from the Green Belt?

6.77 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?
6.78 Is the proposed allocation consistent with paragraph 74 of the Framework in respect of the loss of recreation space? Would it be effective in bringing forward replacement playing pitch provision?

6.79 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework, and are they justified?

6.80 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.81 Are the proposed Modifications necessary for soundness?

**HSG16: Land at Green Hill and Alexandra Avenue, Warlingham**

6.82 What are the exceptional circumstances for the release of the site from the Green Belt?

6.83 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

6.84 Is the specific requirement for the provision of 25 extra care units within policy HSG16 justified? (see also TLP14)

6.85 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

6.86 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.87 Are the proposed Modifications necessary for soundness?

**HSG17: Land at Farleigh Road, Warlingham**

6.88 What are the exceptional circumstances for the release of the site from the Green Belt?

6.89 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

6.90 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

6.91 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.92 Are the proposed Modifications necessary for soundness?

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HSG18: Former Shelton Sports Ground, Warlingham

6.93 What are the exceptional circumstances for the release of the site from the Green Belt?

6.94 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

6.95 Is the proposed allocation consistent with paragraph 74 of the Framework in respect of the loss of playing fields? Would it be effective in bringing forward replacement provision?

6.96 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework, and are they justified?

6.97 Would criterion II. Ecology be effective in mitigating the effects of the proposed allocation on ecology and the nearby woodland?

6.98 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.99 Are the proposed Modifications necessary for soundness?

HSG19: Edgeworth Close, Whyteleafe

6.100 What effect would the redevelopment of this site have upon car parking and bin storage for nearby residents?

6.101 Are there any matters which would mean that the site is not deliverable or developable as per footnotes 11 and 12 to the Framework?

6.102 Are the proposed Modifications necessary for soundness?

HSG20: North Tandridge: One Public Estate (NTOPE), Caterham

6.103 In terms of paragraph 154 of the Framework, does HSG20 in seeking to achieve the objectives of the North Tandridge: One Public Estate Programme, which is not part of the development plan, provide a clear indication of how a decision maker should react to a development proposal? Is HSG20 justified and would it be effective?

6.104 Are the proposed Modifications necessary for soundness?
Matter 7 Employment land allocations

Issue: Are the proposed employment land allocations justified, effective and consistent with national policy?

SES01: Godstone Road Business Centre, Whyteleafe

7.1 Are the proposed Modifications necessary for soundness?

7.2 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework, and are they justified?

7.3 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

SES02: Hobbs Industrial Estate, Felbridge

7.4 What are the exceptional circumstances for the release of the site from the Green Belt?

7.5 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

7.6 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

7.7 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

7.8 Are the proposed Modifications necessary for soundness?

SES03: Lambs Business Park, South Godstone

7.9 What are the exceptional circumstances for the release of the site from the Green Belt?

7.10 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

7.11 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?
7.12 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework, and are they justified?

7.13 Are the proposed Modifications necessary for soundness?

**SES04: Westerham Road Industrial Estate, Tatsfield**

7.14 What are the exceptional circumstances for the release of the site from the Green Belt?

7.15 Is the proposed Green Belt boundary justified and consistent with national policy as set out in paragraph 85 of the Framework?

7.16 Does the allocation constitute major development within the Surrey Hills AONB? Would the proposed allocation conserve the landscape and scenic beauty of the AONB?

7.17 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

7.18 Are the requirements for financial contributions as set out in V. consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

7.19 Are the proposed Modifications necessary for soundness?

**IES01: Snowhill Business Centre, Copthorne**

7.20 What is the purpose of the allocation? Given that the site is situated in the Green Belt and national policy in paragraph 89 of the Framework sets out that the construction of new buildings in the Green Belt should be regarded as being inappropriate other than in the listed exceptions, would the Policy be effective in providing for the intended employment development? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

7.21 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

7.22 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

7.23 Are the proposed Modifications necessary for soundness?

29th July 2019
IES02: Brewer Street, Bletchingley

7.24 What is the purpose of the allocation? Given that the site is situated in the Green Belt and national policy in paragraph 89 of the Framework sets out that the construction of new buildings in the Green Belt should be regarded as being inappropriate other than in the listed exceptions, would the Policy be effective in providing for the intended employment development? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

7.25 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, the Policy should be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable.

7.26 Is IES02 consistent with paragraphs 133 and 134 of the Framework in seeking development to be ‘sensitive’ to the Brewer Street Conservation Area?

7.27 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

7.28 Are the proposed Modifications necessary for soundness?

IES03: Cophall Farm, Copthorne

7.29 What is the purpose of the allocation? Given that the site is situated in the Green Belt and national policy in paragraph 89 of the Framework sets out that the construction of new buildings in the Green Belt should be regarded as being inappropriate other than in the listed exceptions, would the Policy be effective in providing for the intended employment development? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

7.30 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

7.31 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

7.32 Are the proposed Modifications necessary for soundness?
IES04: Systems House, Blindley Heath

7.33 What is the purpose of the allocation? Given that the site is situated in the Green Belt and national policy in paragraph 89 of the Framework sets out that the construction of new buildings in the Green Belt should be regarded as being inappropriate other than in the listed exceptions, would the Policy be effective in providing for the intended employment development? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

7.34 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

7.35 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

7.36 Are the proposed Modifications necessary for soundness?

IES05: Redhill Aerodrome Industrial Area, South Nutfield

7.37 What is the purpose of the allocation? Given that the site is situated in the Green Belt and national policy in paragraph 89 of the Framework sets out that the construction of new buildings in the Green Belt should be regarded as being inappropriate other than in the listed exceptions, would the Policy be effective in providing for the intended employment development? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

7.38 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

7.39 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

7.40 Are the proposed Modifications necessary for soundness?

IES06: Paddock Barn Farm, Godstone Road, Caterham

7.41 What is the purpose of the allocation? Given that the site is situated in the Green Belt and national policy in paragraph 89 of the Framework sets out that the construction of new buildings in the Green Belt should be
regarded as being inappropriate other than in the listed exceptions, would the Policy be effective in providing for the intended employment development? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

7.42 Would the proposed allocation conserve the landscape and scenic beauty of the AONB?

7.43 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

7.44 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

7.45 Are the proposed Modifications necessary for soundness?

IES07: Priory Farm, South Nutfield

7.46 What is the purpose of the allocation? Given that the site is situated in the Green Belt and national policy in paragraph 89 of the Framework sets out that the construction of new buildings in the Green Belt should be regarded as being inappropriate other than in the listed exceptions, would the Policy be effective in providing for the intended employment development? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

7.47 To be effective and to be consistent with national policy as set out in paragraph 24 of the Framework, should the Policy be clear as to whether Use Class B1 (Offices) or other main town centre uses would be acceptable within the identified site boundary?

7.48 Are the requirements for financial contributions as set out under Infrastructure consistent with national policy for planning obligations and conditions as set out in the Framework and are they justified?

7.49 Are the proposed Modifications necessary for soundness?
Matter 8: Development Management Policies

Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?

**TLP02: Presumption in favour of Sustainable Development**

8.1 Is the Policy necessary given the guidance in the PPG that in local plans there should be no need to reiterate policies that are already set out in the National Planning Policy Framework (Paragraph: 010 Reference ID: 12-01020140306)?

8.2 If the policy is justified, should it be consistent with the Framework 2019 paragraph 11d)?

**TLP03: Green Belt**

8.3 Would the second paragraph of the Policy be effective given the legal requirement that local plans are to be reviewed at least every five years?

8.4 Is the third paragraph of the Policy consistent with paragraph 87 of the Framework in stating that inappropriate development will normally be refused?

8.5 Are the proposed Modifications necessary for soundness?

**TLP04: Infrastructure Delivery and Financial Contributions**

8.6 In terms of paragraph 154 of the Framework, does Policy TLP04 provide a clear indication of how a decision maker should react to a development proposal? Is the Policy proportionate in requiring all proposals to demonstrate mechanisms to provide infrastructure?

8.7 Is Policy TLP04 consistent with paragraph 204 of the Framework and the Community Infrastructure Levy Regulations 2010 and would it be effective?

8.8 Are the proposed Modifications necessary for soundness?

**TLP05: Development Viability**

8.9 Is the Policy effective and consistent with national policy in requiring compliance with the Infrastructure Delivery Plan which is not a development plan document?

8.10 Is the requirement for a fee for reviewing a viability document justified in a land use planning policy and necessary to make development acceptable in planning terms?

29th July 2019
8.11 Are the proposed Modifications necessary for soundness?

**TLP10: Responsive Housing Strategy**

8.12 In terms of paragraph 154 of the Framework, does Policy TLP10 provide a clear indication of how a decision maker should react to a development proposal?

8.13 The Council’s Housing Strategy is not a development plan document. Is it justified that the Policy favours proposals which accord with it or that Neighbourhood Plans should assist in meeting its objectives? Are the matters listed those which paragraph 159 of the Framework states should be considered in the preparation of the Strategic Housing Market Assessment?

8.14 Are the proposed Modifications necessary for soundness?

**TLP11: Retention and Supply**

8.15 What is the justification for resisting the loss of residential land and units and the amalgamation of dwellings resulting in a net loss of units?

8.16 The Council’s Housing Strategy is not a development plan document. Is it justified and consistent with national policy that proposals must demonstrate how they are responding to the requirements of it?

8.17 Are the proposed Modifications necessary for soundness?

**TLP13: Rural Housing Exception Sites**

8.18 What is the justification for the use of the figure of no more than 20 units? Is it intended that development of such a scale would be considered as being ‘limited’ in regard to the fifth bullet point of paragraph 89 of the Framework?

8.19 Where is the evidence to justify that no more than 10% of units on sites of 10 units or more within a rural exception site can be market housing?

**TLP14: Specialist Need Housing & Extra Care**

8.20 Is the specific requirement for the provision of 25 extra care units within policy HSG16 justified?

8.21 The Council’s Housing Strategy is not a development plan document. Is it justified and consistent with national policy that proposals take full account of it?

**TLP17: Health and Wellbeing**

8.22 Are the thresholds in TLP17 II. for the requirement of Health Impact Assessments justified? Should Health Impact Assessments be sought for
where a development would be likely to give rise to significant impacts on the health and wellbeing of the local population or particular groups within it (PPG Paragraph: 004 Reference ID: 53-004-20140306)?

8.23 Are the proposed Modifications necessary for soundness?

**TLP18: Place-Making and Design**

8.24 Would the Policy be effective and consistent with national policy for requiring good design as set out in the Framework?

8.25 Are the proposed Modifications necessary for soundness?

**TLP19: Housing Densities and the Best Use of Land**

8.26 Would the Policy be effective and consistent with national policy in encouraging the effective use of land?

8.27 In terms of paragraph 154 of the Framework, does Policy TLP19 provide a clear indication of how a decision maker should react to a development proposal?

8.28 Are the proposed Modifications necessary for soundness?

**TLP22: Rural Economy**

8.29 Is the Policy consistent with national policy for Green Belts given that the potential development envisaged within the criteria may constitute inappropriate development which is by definition, harmful to the Green Belt? Would the policy be effective in supporting a prosperous rural economy?

**TLP23: Protection, Provision and Enhancement of Schools**

8.30 Would the Policy be effective and justified in requiring the agreement of the education authority for new schools and education facilities?

8.31 Are the criteria set out in respect of schools in the Green Belt justified and consistent with national policy for Green Belts as set out in the Framework?

8.32 Are the proposed Modifications necessary for soundness?

**TLP24: Retail Hierarchy**

8.33 Are the proposed Modifications necessary for soundness?
TLP25: Retail Frontages

8.34 Is the Policy sufficiently clear in how the percentages of retail frontage are defined? How would these be applied in practice through the development management process?

8.35 If the percentages set out are found to be in need of updating should this be considered in a review of the Plan as required by Regulation 10A of the Town and Country Planning (Local Planning) (England Regulations 2012)? Would it be effective and consistent with national policy to update the percentages outside of the development plan as suggested?

8.36 Town and Local Centre Reviews and Retail Centre Health Checks are not part of the development Plan. Is it effective and consistent with national policy that the policy requires compliance with the findings of these documents? Consequently, in terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.37 Are the proposed Modifications necessary for soundness?

TLP26: Development Within and Outside Town and Local Centres

8.38 Is the 500 square metre threshold for applying a sequential test justified and in accordance with national policy as set out in paragraph 24 of the Framework? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.39 Are the floorspace thresholds for impact assessments justified?

8.40 Are the proposed Modifications necessary for soundness?

TLP27: Retail Provision

8.41 Are the proposed Modifications necessary for soundness?

TLP28: Caterham Town Centre and Local Centre

8.42 In criterion I, is it effective and consistent with national policy to refer to the Council’s Housing Strategy rather than Policy TLP10, as the Housing Strategy is not part of the development plan?

8.43 Is it effective and consistent with national policy in criterion X to refer to the parking standards applied by the Council when these are not specified in the Plan? Consequently, in terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?
8.44 Is the approach to seeking financial contributions set out in Policy TLP28 consistent with paragraph 204 of the Framework and the Community Infrastructure Levy Regulations 2010 and would it be effective?

8.45 Are the proposed Modifications necessary for soundness?

**TLP29: Oxted Town Centre**

8.46 In criterion I, is it effective and consistent with national policy to refer to the Council’s Housing Strategy rather than Policy TLP10 as that document is not part of the development plan? How would the delivery of 60 dwellings be achieved? Are these homes included in the supply for housing?

8.47 What is the justification for the inclusion of the listed sites in criterion II?

8.48 Is it effective and consistent with national policy in criterion X to refer to the parking standards applied by the Council when these are not specified in the Plan? Consequently, in terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.49 Is the approach to seeking financial contributions set out in Policy TLP29 consistent with paragraph 204 of the Framework and the Community Infrastructure Levy Regulations 2010 and would it be effective?

8.50 Are the proposed Modifications necessary for soundness?

**TLP30: Green and Blue Infrastructure**

8.51 Are the proposed Modifications necessary for soundness?

**TLP31: Access to Countryside**

8.52 Are the proposed Modifications necessary for soundness?

**TLP32: Landscape Character**

8.53 Is it effective and consistent with national policy for the Policy to require the protection and enhancement of the key landscape features identified in the Surrey Landscape Character Assessment 2015 and the Tandridge Landscape Capacity and Sensitivity Assessment 2016-2018 when these are not set out in the Plan? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

**TLP33: Surrey Hills and High Weald Areas of Outstanding Natural Beauty**

8.54 Is it effective and consistent with national policy for the Policy to require that planning applications demonstrate that they meet the provisions and
objectives of the most up to date AONB Management Plan given that this is not a development plan document? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.55 Is the Policy clear and would it be effective and consistent with national policy to say that small scale affordable housing schemes and/or rural exception sites ‘may’ be acceptable? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.56 Are the proposed Modifications necessary for soundness?

**TLP34: Area of Greater Landscape Value and Area of Outstanding Natural Beauty Candidate Areas**

8.57 Would the retention of the designation of Areas of Greater Landscape Value (AGLV) until the Surrey Hills AONB review is completed apply any different development management requirements to the AGLV than that set out in TLP32?

8.58 Is the application of the principles for protecting the AONB to the AONB Candidate Areas consistent with national policy given those areas are not protected landscapes?

8.59 Are the proposed Modifications necessary for soundness?

**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?

**TLP36: Ashdown Forest Special Protection Area**

8.62 Is the 7 kilometre zone of influence justified and would it be effective in securing the protection of the SPA?

8.63 Is the policy wording in respect of Appropriate Assessment for development beyond the ‘zone of influence’ consistent with the requirements of the Habitats Regulations and would it be effective? Should the Policy be referring to schemes which are likely to have a significant effect upon the Ashdown Forest SPA, either individually or in combination with other plans or projects?

8.64 In respect of criterion III. is it justified to seek provision of a SANG alongside the proposed garden community given the order of priority for provision of SANG in respect of the SPA as set out in the Habitats
Regulation Assessment and potential implementation date of any such SANG at the proposed Garden Community?

8.65 Is the approach to seeking financial contributions set out in Policy TLP36 consistent with paragraph 204 of the Framework and the Community Infrastructure Levy Regulations 2010 and would it be effective?

8.66 Are the proposed Modifications to the Policy and supporting text necessary for soundness?

**TLP37: Trees and Soft Landscaping**

8.67 Are the proposed Modifications necessary for soundness?

**TLP38: Play and Open Space**

8.68 Is the Policy consistent with paragraph 74 of the Framework in not requiring that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location?

8.69 Is it effective and consistent with national policy to require accordance with the Councils Open Space Assessment and Corporate Open Space Strategy when these are not development plan documents? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.70 Are the proposed Modifications necessary for soundness?

**TLP39: Providing Playing Pitches and Built Leisure Facilities**

8.71 Is the Policy consistent with paragraph 74 of the Framework in not requiring that the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location?

8.72 Is it effective and consistent with national policy to require accordance with the Councils Playing Pitch Strategy when this is not a development plan document? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.73 Are the proposed Modifications necessary for soundness?

**TLP40: Burial Space**

8.74 Is the Policy consistent with paragraph 89 of the Framework which includes cemeteries as one of the exceptions where the construction of new buildings in the Green Belt is not regarded as being inappropriate as
long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it?

**TLP41: Tourism**

8.75 Is it effective and consistent with national policy to require accordance with the Councils most up to date Economic Proposition, the East Surrey Rural Tourism Co-operation Project and the AONB Management Plans when these are not development plan documents? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.76 Is the third paragraph of the Policy clear in respect of development proposals in the Green Belt and would it be effective?

8.77 Are the proposed Modifications necessary for soundness?

**TLP42: Hotels and Tourist Accommodation**

8.78 Is the first part of the policy in respect of the existing level of hotel provision clear and would it be effective?

8.79 Is the third paragraph consistent with paragraph 204 of the Framework and the Community Infrastructure Levy Regulations 2010 and would it be effective?

8.80 Is the paragraph in respect of ‘New Accommodations’ consistent with paragraphs 24 and 28 of the Framework?

8.81 Is it effective and consistent with national policy to require accordance with the Surrey Hotels Futures Study when this is not a development plan document? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

**TLP43: Historic Environment**

8.82 Is TLP43 consistent with national policy as set out in the Framework in respect of consideration of effects upon the significance of heritage assets and the requirements to balance any harm against public benefits?

8.83 Are the proposed Modifications necessary for soundness?

**TLP44: Renewable Energy Infrastructure**

8.84 Is Policy TLP44 consistent with renewable energy, historic environment and Green Belt policy as set out in the Framework and would it be effective?
8.85 To be effective, should the supporting text refer to airport safeguarding provisions for Gatwick Airport as per DfT Safeguarding Circular 01/2003?

**TLP46: Pollution and Air Quality**

8.86 Is there missing text in the first sentence of the first paragraph of the Policy after ‘designed in such a …’?

8.87 Is it effective and consistent with national policy to require accordance with the Councils Air Quality Impact Assessment, conditions developed by Surrey Air Alliance and the Local Transport Plan when these are not a development plan documents? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.88 Are the proposed Modifications necessary for soundness?

**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?

8.90 Is it effective and consistent with national policy to require accordance with the Tandridge Strategic Flood Risk Assessment and Infrastructure Plan when these are not development plan documents?

8.91 Is the policy effective on requiring accordance with the Building Regulations Part H3 as this is dealt with by other provisions?

8.92 Are the proposed Modifications necessary for soundness?

**TLP48: Water Consumption**

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

8.94 Are the proposed Modifications necessary for soundness?

**TLP49: Waste**

8.95 Would the Policy be effective in requiring accordance with the waste collection authority requirements when these are not specified? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.96 Is the requirement for all development that provides for food and drink to be consumed off the premises, to provide compartmentalised recycling and residual waste receptacles consistent with the Framework policy for planning conditions and obligations?
TLP50: Sustainable Transport and Travel

8.97 Would the Policy be effective in requiring accordance with Local Transport Plan requirements when these are not specified? In terms of paragraph 154 of the Framework, does the Policy provide a clear indication of how a decision maker should react to a development proposal?

8.98 Is the 10 year period for the bus operational subsidy justified?

8.99 Are the proposed Modifications necessary for soundness?

TLP51: Airport Related Parking

8.100 Is the Policy justified in prohibiting any additional or replacement airport related parking in Tandridge?

Philip Lewis

INSPECTOR

24 July 2019