



Our Local Plan

**Tandridge District Council - Local Plan 2033:
Sustainability Appraisal**

**Incorporating Strategic Environmental Assessment
Volume 1: Context**

January 2019 Local Plan Submission

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NON TECHNICAL SUMMARY

Introduction

This report is the Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) of the Local Plan 2033. It considers environmental, social and economic context effects of the Plan.

Introduction to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

The purpose of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is to help planning authorities contribute to achieving sustainable development in preparing their plans. “Sustainable development” aims to integrate the need to stimulate economic growth, to deliver the needs of all sectors of society, and to conserve and enhance the local environment.

SEA involves examining certain plans and programmes primarily for significant environmental effects. SA widens the approach to include social and economic as well as environmental issues. Local Planning Authority (LPA) plans must undergo both the process of SA and SEA as a result of legislative changes enacted in the UK in summer 2004.

The combined process reviews plans against a set of criteria reflecting local problems and the LPA’s objectives in delivering sustainable development and addressing these problems.

The Local Plan 2033

The Tandridge District Council Local Plan 2033 sets out the spatial development strategy and policy framework to guide the provision of jobs and homes in the District up to 2033. The document also sets out policy mechanisms for protecting, conserving and enhancing the natural, and built historic environment whilst identifying how and where infrastructure improvements will be delivered.

There have been several stages of the emerging Local Plan 2033 so far, including three stages of consultation already undertaken to meet Regulation 18 of the Town and Country Planning (Local Plan) (England) Regulations 2012.

The Plan is now at Proposed Submission Stage (Regulation 19) which sees the publication of the Plan, a further public consultation, examination and report by the Planning Inspectorate. Once the Local Plan can be deemed sound, it is the Council’s decision, whether to adopt the Plan.

The Sustainability Appraisal (SA) of the Local Plan 2033

This report forms part of the Sustainability Appraisal (SA) of the Local Plan 2033. It represents the combined output of the SA and SEA processes. This SA Report is written to accompany the Regulation 19 document and has appraised its contents.

Several stages of the SA preceded this report, representing the evolving and iterative nature of the SA process. SA reports have supported each previous stage of the emerging Local Plan 2033 so far, including the three stages of consultation already undertaken to meet Regulation 18 of the Town and Country Planning (Local Plan) (England) Regulations 2012.

The 2015 Scoping Report established the SA Framework for assessment, including decision-aiding questions. The SA Scoping Report also documented the results of the gathering of evidence concerning the current social, economic and environmental conditions in the District. It identified key sustainability problems or likely future problems by looking at baseline statistics and evidence. These processes have been continued in this report.

Outcomes of the Sustainability Appraisal (SA) process

The assessment is undertaken using a framework of 16 objectives that was pre-established in partnership by East Surrey local planning authorities. There are some inherent incompatibilities between the objectives, and as a consequence the assessment contains a mix of positive and negative scores. However it is clear that the production of the Local Plan 2033 and implementation of its proposals will result in a positive outcome, compared to the option of doing nothing.

Many of the negative aspects picked up by SA assessment are pre-existing matters and several can be addressed and rectified by the proposals of the Local Plan. Assessment against SA objectives has identified a number of potential mitigations to offset negative effects, or further enhance positive ones and has usefully informed the Local Plan 2033 as a result.

Summary Table of the Likely Significant Effects of the Local Plan 2033 on the SA Objectives

Objective	Summary of Likely Significant Effects
<p>1 To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.</p>	<p>The significant effects on this SA Objective are positive. The Plan successfully identifies a good supply of site-specific deliverable opportunities including a substantial Garden Community; these support sympathetic accommodation of housing growth in sustainable locations and appear likely to be deliverable and viable. The Plan seeks to make the best use of land by optimising densities where appropriate..</p> <p>The Plan makes provision for proportions of affordable housing that are viable, deliverable and tested against evidence. Support for Rural Housing Exception Sites will help support thriving rural communities.</p> <p>The Plan has an in-built flexibility to enable it to respond to the most up-to-date housing strategy to facilitate the provision of housing for elderly persons, for specialist housing and self-build. The Plan addresses the needs of Gypsies, Travellers, and Travelling Showpeople.</p> <p>Inevitably, policies restricting housing in certain areas (e.g. Tier 3 and Tier 4 settlements) is a minor negative in terms of this objective. Also, policies requiring other uses can be interpreted as being a minor negative effect although these effects are likely to be very minor in a wider District context.</p> <p>Overall, Plan effects are expected to be positive in respect of objective 1.</p>

Objective		Summary of Likely Significant Effects
2	To facilitate the improved health and well-being of the whole population.	<p>Overall effects on health and well-being are positive, stemming from a number of different commitments, including a settlement hierarchy which prioritises locations accessible to health facilities. Positive effects stem from a number of housing policies that aim to improve the living environment, notably the policy on specialist need housing and extra care. Site-specific policies that lead to the provision of, or are readily accessible to, green infrastructure (with its acknowledged health benefits) are also beneficial.</p> <p>Environmental policies also have beneficial effects, such as policies on pollution and air quality, Green Belt, access to the countryside and green & blue infrastructure. Provision of sufficient recreational and open space opportunities also have a beneficial effect, including addressing of the Natural England's Accessible Natural Greenspace (ANGSt) Standard (ANGSt) deficit at South Godstone, which will provide a strategic scale open space and opportunity for enhanced recreation serving a wide area.</p>
3	To conserve and enhance, archaeological, historic and cultural assets.	<p>Tandridge's cultural heritage is that of a rural District. The overwhelming threat in respect of objective 3 is the sheer scale of development it is expected to accommodate.</p> <p>That said the Plan does seek to mitigate this as far as possible with policies on historic environment, Green Belt, landscape character and the AONB. The settlement hierarchy which prioritises higher order locations for development ahead of areas of more rural character also achieves this to some degree.</p>
4	To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	<p>Overall, there are beneficial effects for this objective from the Plan. The distribution of development prioritises locations which are accessible by sustainable means of transport, including the South Godstone Garden Community. There has been an inbuilt focus on locating development in locations with relatively good accessibility to services.</p> <p>The overwhelming majority of sites score positively in this respect, as do policies that define a retail centres hierarchy (TLP24) and frontages (TLP25), sustainable transport and ensure facilities and services are provided locally.</p>
5	To make the best use of previously developed land and existing buildings.	<p>Inevitably and unavoidably there are significant negatives resulting from accommodating a very significant scale of development in a rural and overwhelmingly greenfield District.</p> <p>In this difficult context, the Plan places a priority on maximising the use of the very limited supply of brownfield opportunities that exist. Urban regeneration policies on Oxted Town Centre, Caterham Town Centre and the One Public Estate programme are all very beneficial in this respect.</p> <p>The distribution of development prioritises higher order locations where there is more likely to be previously developed land available.</p> <p>In addition the employment policies, informed by the Economic Needs Assessments, focus on intensification opportunities within current sites,</p>

Objective		Summary of Likely Significant Effects
		<p>thereby limiting pressure to develop greenfield sites.</p> <p>Policy TLP19 'Housing Densities and the Best Use of Land' supports the intensification of previously-developed sites within settlement boundaries.</p>
6	To support economic growth that is inclusive, innovative and sustainable.	<p>The effects on objectives 6 and 7 are to a large extent indistinguishable from one another and so are considered together.</p> <p>Cumulatively the Plan has a positive effect on economic growth. In particular, definition of employment / retail hierarchies, promotion of the rural economy, urban regeneration policies, and promotion of tourism are all positives.</p>
7	To provide for employment opportunities to meet the needs of the local economy.	<p>The Plan also identifies the specific locations where employment intensification can take place. In addition the new South Godstone Garden Community will include a mix of employment space, including light industrial, offices, start up space and 'hot desking' facilities.</p> <p>Through the Plan (Policies TLP20, 21, 22) and in support of the Council's Economic Proposition (2017), ambitious commitments developing a thriving economy with high-value, high-tech businesses are demonstrated. Over the Plan period, an employment space requirement of 15.3ha has been identified. Opportunities for intensification on employment sites, both Strategic and Important sites amount to around 21ha and exceeds identified need by around 6ha. In conclusion, the plan is positive in terms of economy and employment and should deliver results in respect of objectives 6 and 7.</p>
8	To reduce greenhouse gas emissions and move to a low carbon economy.	<p>This objective focuses on reducing the need for energy and facilitating renewable and decentralised energy sources. Therefore policies on Renewable Energy Infrastructure, as well as Energy Efficient and Low Carbon Development are particular positives. The South Godstone Garden Community, with its emphasis on zero carbon and energy efficient technologies has scope to be an exemplar development in line with established TCPA principles.</p> <p>The objective also aims to reduce overall emissions. An increase in the number of households and businesses in the District has the potential for an adverse effect on reducing greenhouse gas emissions, although the Plan makes positive efforts to reduce the need to travel by car by promoting sustainable transport options.</p>
9	To use natural resources prudently.	<p>The Plan has limited scope to influence many of the aims of this objective. Sustainable construction has increasingly fallen within the domain of building regulations. Other matters such as the use and supply of sustainable local products and services are difficult for the planning system to influence, although the policy promoting the rural economy may help in this regard.</p> <p>Whereas matters related to waste, recycling and mineral resources fall into the remit of the County Council. Nonetheless, proximity to household waste recycling, as well as areas protected for mineral resources has been a</p>

Objective		Summary of Likely Significant Effects
		<p>consideration in the assessment of sites.</p> <p>Policies restricting development in unsustainable locations help reduce resources and waste collection. Protection of natural areas may also have positive impacts in terms of natural resources.</p>
10	To adapt to the changing climate.	<p>Adaptation to climate change has much to do with addressing flood risk (Objective 11). However, green infrastructure, as well as the provision of trees and soft landscaping, has a role to play in reducing the heat island effect (although more of a factor in urbanised area) and providing carbon sinks. The effects of this are likely to be in the long-term, rather than immediate, given the necessary time for trees and landscaping to reach maturity. The provision of a large scale strategic area of high quality green infrastructure will be particularly beneficial, although balanced by the inevitable loss of greenfield farmland for development.</p> <p>Good quality, climate resilient design will have a role to play. Although more related to objective 8, prioritising zero/low carbon development and energy efficiency has a transboundary positive effect in mitigating climate change.</p>
11	To reduce flood risk.	<p>This objective is primarily addressed by the Policy on 'Sustainable Urban Drainage and Reducing Flood Risk'.</p> <p>The provision of green infrastructure may also be beneficial, particularly where it has scope to be multifunctional incorporating ponds and wetland habitats which also have a SuDS role.</p> <p>The investigation of sites has been informed by flood risk information, both fluvial and surface water. Therefore, serious flood risk issues have weighed against a site's suitability for development. Of the last three options for a Garden Community, it is notable that South Godstone has the least issues in respect of flood risk.</p>
12	To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.	<p>The policy for all new homes to meet the water efficiency standard of 110 litres per person per day is a very positive measure to reduce overall water consumption.</p> <p>Tandridge has large areas within groundwater source protection zones so there is a risk to water quality from development, exacerbated by factors such as proximity to water-courses, areas of flood risk and contamination. Therefore the requirement for SuDS to benefit water treatment is beneficial in this respect, and the pollution policy also has a role to play. Green areas may benefit water treatment both as a natural filter and reducing run-off.</p>
13	To reduce land contamination and safeguard soil quality and	<p>Most of the District is agricultural land quality grade 3 or 4, with 3 being the more valuable. The loss of greenfield land and soils is a negative, particularly where it is higher quality agricultural land.</p> <p>Contamination can stem from a number of sources – former agricultural</p>

Objective		Summary of Likely Significant Effects
	quantity.	<p>uses, former landfill and former industrial uses. The selection of sites has been informed by the presence of these risks.</p> <p>The pollution policy may help address risks where they occur. The Oxted Town Centre policy may help bring back into use centrally located brownfield areas with a history of potentially contaminating uses.</p>
14	To ensure air quality continues to improve and noise and light pollution are reduced.	<p>The scale of development envisaged by the Plan will have some detrimental effects on air quality, although the supporting technical evidence indicates that these impacts are not significant and considered acceptable.</p> <p>Nonetheless, based on the recommendations of technical evidence, the Local Plan includes measures to further benefit air quality. These are primarily delivered through the Pollution and Air Quality Policy, which acknowledges the role of the Surrey Air Alliance and the Local Transport Plan.</p> <p>The Sustainable Transport policy is also very positive, ensuring the provision of electric vehicle charging points in all new development as well as supporting public transport, cycling and walking.</p> <p>The distribution of development prioritises locations which are accessible by sustainable means of transport, including the South Godstone Garden Community. This will have a related air quality benefit.</p>
15	To protect and enhance landscape character.	<p>Inevitably there will be some landscape impact from the sheer scale of development that is to be accommodated in a sensitive rural area. The most significant impact will be from the South Godstone Garden Community location.</p> <p>The Local Plan does include policies which will have a positive effect, including 'Landscape Character', 'Surrey Hills and High Weald Areas of Outstanding Natural Beauty', 'Trees and Soft Landscaping', 'Areas of Greater Landscape Value', 'Historic Environment' as well as a number of other which protect greenspaces and promote green infrastructure. Policies which prevent unplanned development in the countryside, for example by retaining development hierarchies may also have a positive effect. Urban regeneration policies are also considered a positive, simply by prioritising previously developed sites and thereby reducing pressure on the countryside.</p>
16	To conserve and enhance biodiversity.	<p>Despite the very high levels of development, the Plan has made significant attempts to achieve a net gain in biodiversity. Perhaps most significantly, a new 100ha area of green infrastructure is proposed at South Godstone, which will address a deficit at strategic scale against Natural England's Accessible Natural Greenspace (ANGST) Standard.</p> <p>Other policies are also very positive, including 'TLP 35 Biodiversity, Ecology & Habitats', 'Ashdown Forest Special Protection Area', 'Green and Blue Infrastructure' and 'Play and Open Space'. The latter policy commits to the ANGST standard.</p>

Statement on the difference the SA process has made

The SA process has been a fundamental tool in the development of the Local Plan 2033. The SA has provided evidence to inform decision-making and helped with developing options. It has also been crucial in assessing any changes or suggested changes to the plan policies as they develop. It acts as a way to highlight any possible negative effects and ensure that where possible the policies include mitigation of these effects.

The requirement for a 'Non-Technical' Summary

PPG Paragraph 019: The Sustainability Appraisal must include a non-technical summary of the information within the main report. The summary should be prepared with a range of readers in mind, and provide a clear, accessible overview of the process and findings

1. CONTEXT

1.1 Introduction

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

The Council is required to appraise the sustainability of its proposed Local Plan and alternatives at certain stages of development. This is done through the publication of an SA, which incorporates the key themes of the Strategic Environmental Assessment (SEA). This process is an opportunity to consider ways by which the Plan can contribute to improvements in environmental, social and economic conditions

This SA report has been written to accompany the Tandridge District Local Plan 2033 (Regulation 19) document and appraises the policies for managing development in the District until 2033.

1.2 The Tandridge Local Plan

Compliance with the SEA Directive

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

SEA Directive Annex 1(a)

The Current Development Plan to be Replaced or Partially Replaced

The Council currently has an adopted development plan which includes the following documents. The Core Strategy will be replaced, the Local Plan Part 2 – Detailed Policies will be partially replaced.

- Core Strategy (Adopted October 2008): Sets out the strategic policies to steer and manage the approach to development. This will be fully replaced by the Local Plan 2033.
- Local Plan Part 2 – Detailed Policies (Adopted July 2014): Suite of Development Management policies to assist in the assessment of planning applications. This will be partially replaced by the Local Plan 2033.

The Emerging Local Plan 2033

The Local Plan sets out the spatial development strategy and policy framework to guide the provision of jobs and homes up to 2033. The document also sets out policy mechanisms for protecting, conserving and enhancing the natural, and built historic environment whilst identifying how and where infrastructure improvements will be delivered.

This document is accompanied by an Infrastructure Delivery Plan which will also inform future revisions to the Community Infrastructure Levy.

The Local Plan must be prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires Local Authorities to follow formal consultation and notification stages prior to adoption. Further information regarding the stages of preparation is set out in the Council’s Local Development Scheme (2018).

Stages of the Emerging Local Plan 2033

Post Local Plan: Publication (Regulation 19)

Following the Regulation 19 consultation, the Council is able to make minor changes to the document without the need to carry out further consultation. Therefore the Council has made minor updates to the SA in the form of clarifications, corrections and elaborations.

Local Plan: Publication (Regulation 19)

The Proposed Submission Stage (Regulation 19) saw the publication of the Plan which set out the preferred content, strategy and policies which the Council feel should be examined by the Planning Inspectorate. When consulting at this stage, the Council is confident that the Plan prepared is sound, justified, effective and legally compliant.

Prior to the submission of the document to the Planning Inspectorate, the Council published the Plan together with associated documents (including the SA) for comments to be made on the soundness and legal compliance of the Plan. The Council invited interested parties (in addition to the specific and general consultation bodies) to make formal representations at this stage.

This SA Report was originally written to accompany the Regulation 19 document and appraised its contents. Subsequently the Council has made minor updates to the SA in the form of clarifications, corrections and elaborations as outlined in this report.

Previous Stages of the Local Plan

As set out in Table 1, there have been several stages of the emerging Local Plan 2033 so far, including three stages of consultation already undertaken to meet Regulation 18 of the Town and Country Planning (Local Plan) (England) Regulations 2012.

Table 1: Stages of the TDC Local Plan 2033

Preparation Stage (Regulation 18) – Local Plan: Issues and Approaches	Q3 2015/16 (Oct – Dec 15) COMPLETED
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Additional Preparation Stage (Regulation 18) - Sites Consultation	Q3 2016/17 (Oct - Dec 16) COMPLETED
Additional Preparation Stage (Regulation 18) - Garden Village and Strategic Sites Consultation	Q2 2017/18 (Jul - Sept 17) COMPLETED
Proposed Submission Stage (Regulation 19)	Q2 2018/19 (Jul - Sept 18) COMPLETED
Submission (Regulation 22)	Q3 2018/19 (Oct - Dec 18)
Independent Examination (Regulation 24)	Q1 2019/20
Adoption of a Local Plan (Regulation 26)	Q3 2019/20

The initial Local Plan: Issues and Approaches (2015) went out to public consultation on 18 Dec 2015 - 26 Feb 2016. It invited comments on a range of approaches regarding housing, employment, business and leisure needs with the intention of gaining early views on what the Plan could include and the ways in which we could address future needs.

The Local Plan: Sites Consultation (4 Nov 2016- 30 Dec 2016) gave residents and interested parties an opportunity to comment on sites being assessed as part of the Plan.

The Local Plan: Garden Villages document (14 August 2017-9 October 2017), invited comments on the potential location of the Garden Village development which forms part of the preferred strategy the Council is pursuing in preparing the local plan.

Forthcoming Stages of the Local Plan 2033

Submission & Independent Examination of a Local Plan (Regulations 22 & 24):

When the Council feel that a sound and legally compliant Plan has been prepared, the Plan and associated documents (including the full evidence base, Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment) are submitted to the Secretary of State for 'examination' and an independent Inspector is appointed to examine the soundness of the Plan.

The Planning Inspectorate will notify the Council of the date for the Examination in Public (EIP) in order to carry out an examination into the Plan's 'Soundness' in accordance with the requirements of the National Planning Policy Framework (NPPF, paragraph 182).

Prior to the formal examination meetings, the appointed Inspector will review the Plan and other information which has been submitted, including consultation responses and evidence based documents. On reflection of the submitted documents the Inspector may request an exploratory meeting to discuss any specific issues they may feel need to be addressed before progressing to the public examination sessions. This may be to request clarity on specific policies included in the document, to explore a piece of evidence in further detail, or relating to matters of soundness.

The outcome of exploratory meetings can result in additional work needing to be carried out by the Council before the examination can progress or a recommendation from the Inspector to withdraw the Plan pending further work.

Adoption of a Local Plan (Regulation 26)

Following the examination of the Local Plan, the Planning Inspector will issue a report setting out a decision as to whether they consider the Plan to be either: sound, sound subject to modification, or unsound. If the Plan is 'sound subject to modification', the Council will need to make necessary 'modifications' which may also need to be publically consulted upon dependent on the extent of those modifications.

Once the necessary steps have been taken to respond to the Planning Inspector's report and the Local Plan can be deemed sound, it is the Council's decision, through Full Council, whether to adopt the Plan.

Evidence Base

Evidence is a key feature of the plan-making process. The NPPF makes it clear that it expects Local Development Plans to be informed by robust and comprehensive information and as such, must reflect on the time it will take for necessary evidence to be gathered.

Evidence gathering is resource intensive and is continually monitored to identify any risks to the plan-making timetable and/or where additional resources are required. The Evidence Base takes the form of research and technical studies and, alongside consultation, is critical to informing the direction and content of policies which may be prepared.

In preparing the emerging Local Plan, the Council has already collected and published an extensive suite of evidence based studies. The Council must collect evidence throughout a plan-making process to ensure that it has suitably considered its reasonable alternatives in terms of how development needs could be met and what policies a Plan should contain. The evidence which has been published to date can be found on the Council's website, and is added to as the Plan is progressed.

1.3 Report Structure

This report consists of the following sections:

Section 1: Context

Section 2: Plans, Policies, Programmes and Sustainability Objectives

Section 3: Baseline Information and Sustainability Issues

Section 4: Appraisal methodology

Section 5: Options, Assessments and Appraisals

Section 6: Summary of Likely Significant Effect of the Plan against SA Objectives

Section 7: Ways of Mitigating Adverse Effects & Maximising Beneficial Effects

Section 8: Consultation & Monitoring

1.4 Sustainable Development, SA and SEA

1.4.1 Sustainable Development

By undertaking the SA, the Council will be able to show that the Local Plan will help contribute to achieving sustainable development.

There are many definitions of sustainable development. The most common and widely accepted is that adopted by the World Commission on Environment and Development in 1987:

"Development that meets the needs of the present without compromising the ability of future generations to meet their own needs"

This resulted in an international commitment to achieving sustainable development - Resolution 24/187 of the United Nations General Assembly.

The UK Sustainable Development Strategy 2005 "Securing the Future" sets out five 'guiding principles' to achieving sustainable development. These are:

1. living within the planet's environmental limits
2. ensuring a strong, healthy and just society;
3. achieving a sustainable economy;

4. promoting good governance; and
5. using sound science responsibly.

1.4.2 Strategic Environmental Assessment (SEA)

Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive) and Environmental Assessment of Plans and Programmes Regulations (2004) specific types of plans that set the framework for the future development consent of projects or which require Appropriate Assessment must be subject to an environmental assessment. There are exceptions to this requirement for plans that determine the use of a small area at a local level and for minor modifications if it has been determined that the plan is unlikely to have significant environmental effects. In accordance with the provisions of the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9 (1)), the Council must determine if a plan requires an environmental assessment.

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

The SEA is focused primarily on environmental effects. As set out in the next section, SEA is incorporated into the UK's statutory requirement for Sustainability Appraisal (SA), which addresses a wider social and economic remit, in addition to environmental.

1.4.3 Sustainability Appraisal (SA)

Under UK legislation (the Planning and Compulsory Purchase Act 2004 and associated Regulations), the Council is required to carry out a Sustainability Appraisal (SA) for all Development Plan Documents. [Section 19 of the Planning and Compulsory Purchase Act 2004](#) requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a [Local Plan](#) during its preparation. More generally, [section 39 of the Act](#) requires that the authority preparing a Local Plan must do so "with the objective of contributing to the achievement of sustainable development".

Essentially SA is a tool used to appraise planning policy documents in order to promote sustainable development. This considers the social and economic impacts of a plan as well as the environmental impacts. SA also incorporates the requirements for Strategic Environmental Assessment (SEA) under the 2001/42/EEC European Directive. Essentially the original EU requirement for SEA requires an assessment on environmental criteria, whilst with the process of SA social and economic aspects are all also taken into consideration.

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

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

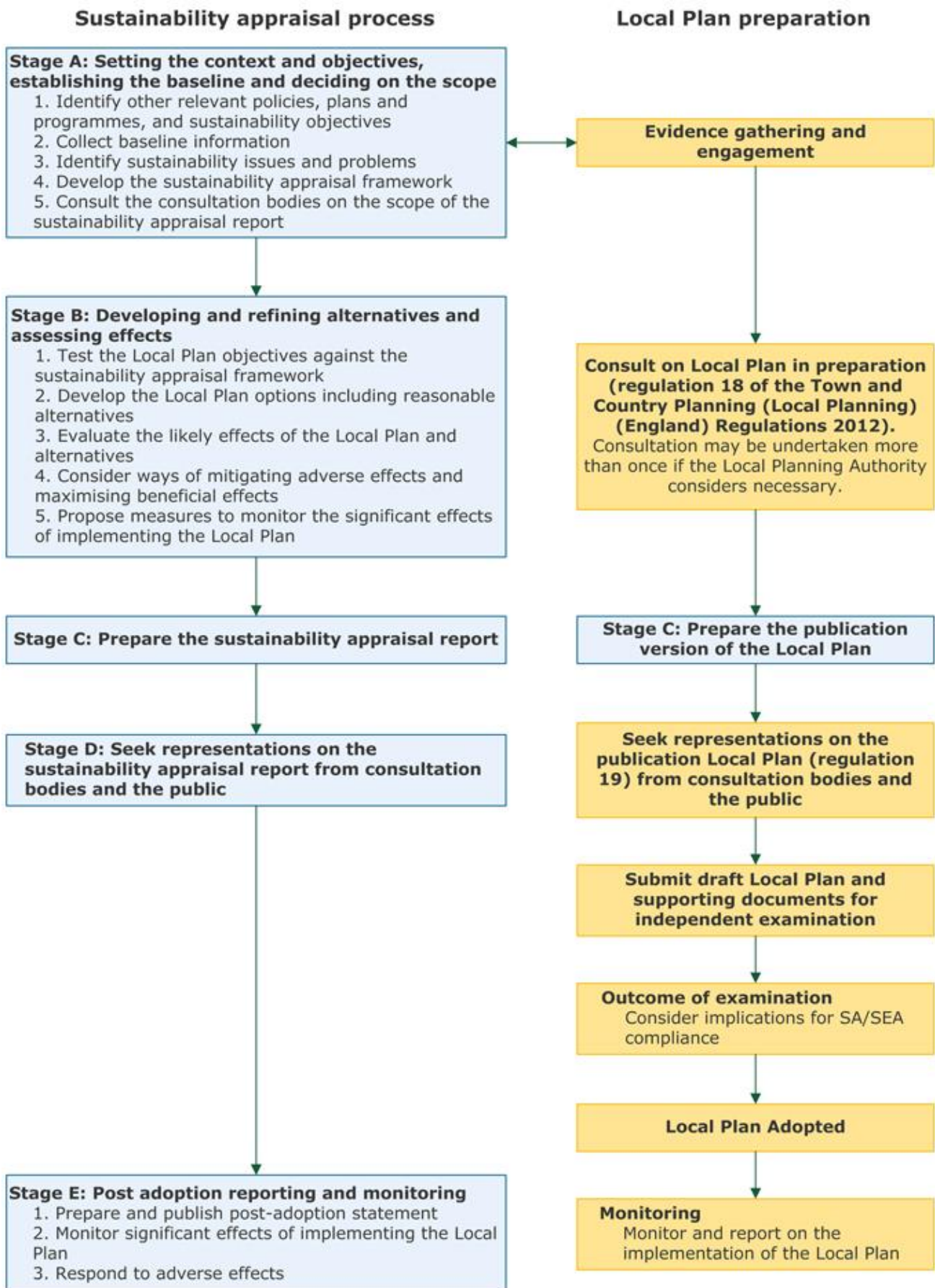
Stages of the Sustainability Appraisal

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.

Additional details about each of the respective stages are contained in Figure 1, overleaf.

Figure 1: The Five Stages of Sustainability Appraisal



1.5 Stages of the SA

The SA Scoping Report (2015)

The 2015 Scoping Report represented Stage A of the process. It identified the scope and level of detail of the information to be included in subsequent SA reports. It sets out the context, objectives and approach of the assessment; and identifies relevant environmental, economic and social issues and objectives. The scoping report was set out under the following topics:

- Biodiversity and Nature Conservation
- Population
- Health
- Soil (including land contamination)
- Water: quality, quantity and flooding
- Air quality
- Climate change
- Heritage
- Landscape and Countryside
- Waste and Recycling, and Minerals
- Amenity and Community Facilities
- Social Inclusiveness, Equal Opportunities and Access to Services
- Housing provision
- Economic development and town centres
- Land (including brownfield and greenfield land)
- Traffic and commuting and access to public transport
- Noise sources
- Crime
- Sustainable development and construction; energy consumption and efficiency

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

For each topic the following information was set out:

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

In reference to SA stage A4, the Scoping Report contained the SA Framework, consisting of objectives, themes and questions. This SA Framework will be used to assess the sustainability merits of aspects of the Local Plan and was agreed on a collective and consistent basis across the East Surrey local planning authorities. More information is contained in Section 5 – the Appraisal Methodology.

The Council prepared a Scoping Report and consulted on this (Stage A5) for a five week period finishing in October 2015 with the statutory consultees (those consulted are listed at the end of this document). The responses to the consultation have been taking into account and used to update the Scoping Report.

Due to the amount of time that has passed subsequent to publication of the 2015 Scoping Report, Stages A1, A2 and A3 have been revisited as part of this Regulation 19 SA. Section 2 of this report represents a further iteration of Stage A1, the Appendix is Stage A2 and Section 3 represents Stage A3. This demonstrates ongoing monitoring in practice.

The SA 'Issues and Approaches' (Regulation 18) Report (2015)

This SA Report accompanied the Tandridge District Local Plan – Issues and Approaches (Regulation 18) document. This SA Report related to stage B of the SA process listed in Figure 1. It:

- Tested the vision and objectives against the sustainability framework (SA stage B1)
- Assisted in the development of Local Plan approaches and assessed their likely effects (SA stage B2 and B3);
- Considered how to maximise beneficial effects and minimise negative impacts of different approaches (SA Stage B4)
- Discussed how the Council will approach monitoring (SA Stage B5)

A summary of the results of the assessments from this report can be found in Section 5.1

The SA 'Sites Consultation' (Regulation 18) Report (October 2016)

This SA Report was also a continuation of stage B of the SA process listed in Figure 1

The Council identified 146 potential sites for allocation including residential, employment and Gypsy and Traveller sites. A cluster analysis was undertaken of these sites on a settlement-by-settlement basis. The sites within each settlement were considered to have similar effects against the SA Objectives and as such the assessment discussed each settlement as a whole. The sites within each settlement have been considered individually as a part of preparing the overall commentary for each site. Additional commentary has been prepared where there is

an effect on a specific site, in particular where in some instances sites are separated from the main settlement area.

It also identified seven locations within the District that are potential locations for a large scale mixed use development that would be expected to include commercial floorspace and approximately 2,000 homes. These were Blindley Heath, Burstow (Horne), Copthorne, Hobbs Industrial Estate, Lambs Business Park, Lingfield, and South Godstone.

A summary of the results of the assessments from this report can be found in Section 5.1

The Report also contained a number of mitigation considerations and recommendations across the 16 SA Objectives. These have been built upon in this 2018 SA Report at Section 7.

The SA (Regulation 18) - Potential Garden Village Locations (August 2017)

This SA Report was also a continuation of stage B of the SA process listed in Figure 1. It presented an assessment of potential Garden Village locations with the following intentions:

- To consolidate all SAs that have been carried out on potential Garden Village locations into one focused SA report;
- To identify where the development within a broad location is likely to result in significant effects and inform mitigation; and
- To inform the options for a potential Garden Village and help guide the Council's selection of a preferred broad location for a Garden Village.

The following ten potential Garden Village locations were assessed against the 16 SA Framework Objectives,

- Blindley Heath;
- Horne;
- Copthorne;
- Hobbs Industrial Estate;
- Lambs Business Park;
- Land at Chaldon, Alderstead and Tollsworth Farm
- Land west of Edenbridge
- Redhill Aerodrome
- South Godstone; and
- Lingfield.

The SA of the Regulation 19 SA

This SA report represents the culmination of the ongoing iterative process of SA that has been undertaken in support of the Local Plan 2033. As such it represents updates and revisions to earlier work, as well as ongoing monitoring of contextual and baseline

information originally set out in the 2015 Scoping Report. Stage A of the SA process (as set out in Figure 1) was initially undertaken by the SA Scoping Report in 2015. However, in acknowledgement of the fact that SA is an iterative process this Regulation 19 SA updates much of the earlier Stage A as part of the process of ongoing monitoring of the baseline situation and characteristics of the District. Sites were also assessed as part of earlier SA stages and whilst much of this previous work remains relevant, this report undertakes further assessment of sites and their options. Local Plan policies have been published for the first time as part of the Regulation 19 Local Plan, so this report assesses them as well as alternative approaches, where relevant.

Therefore, in summary this report performs the following functions:

- Ensures that the Local Plan accounts for policies, plans and programmes on an international, national and local scale;
- Provides an updated baseline assessment for Tandridge District, outlining the environmental, social and economic characteristics and raising any issues that the plan will need to account for;
- Further tests sites and policies as part of the Local Plan against the Tandridge District sustainability framework to assess the impact of the policy approaches, including the preferred approaches;
- Ensuring that realistic and meaningful alternative options are tested as part of the process, reflecting on potential improvements to the Local Plan.

1.6 Meeting Statutory Requirements

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

Compliance with the SEA Directive

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

Table 2 below outlines where in the SA the requirements of the Strategic Environmental Assessment Regulations have been met.

Strategic Environmental Assessment Regulations requirements checklist	Where met?
<p>Preparation of environmental report (regulation 12)</p> <p>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)).</p> <p>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)).</p> <p>When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be</p>	<p>Sustainability Appraisal Scoping Report (2015). Updated in this report – Chapters 3 and Appendix 1.</p>

consulted.	
The information referred to in Schedule 2 is: a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Sustainability Appraisal Scoping Report (2015). Updated in this report – Chapters 2 and 3.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Sustainability Appraisal Scoping Report (2015). Updated in this report – Chapters 3 and Appendix 1.
c) The environment characteristics of areas likely to be significantly affected.	Sustainability Appraisal Scoping Report (2015). Updated in this report – Chapters 3 and Appendix 1.
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) .	Sustainability Appraisal Scoping Report (2015). Updated in this report – Chapters 3 and Appendix 1.
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 environmental considerations have been taken into account during its preparation.	Sustainability Appraisal Scoping Report (2015). Updated in this report – Chapters 3 and Appendix 1.
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.	Chapters 5, 6 and 7.
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.	Chapters 5 and 7
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any	Chapter 4 and 5

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.	Chapter 8
j) A non-technical summary of the information provided under the above headings.	Non-Technical summary
<p>Consultation procedures (regulation 13)</p> <p>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.</p>	<p>Alongside Local Plan 2033 Pre-Submission Consultation.</p> <p>More details in section 8.1 of this report.</p>
<p>Information as to adoption of plan or programme (regulation 16)</p> <p>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:</p> <ul style="list-style-type: none"> • the plan or programme adopted • the environmental report • a statement summarising: <ul style="list-style-type: none"> (a) how environmental considerations have been integrated into the plan or programme; (b) how the environmental report has been taken into account; (c) how opinions expressed in response to: <ul style="list-style-type: none"> (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account; (d) how the results of any consultations entered into under regulation 14(4) have been taken into account; (e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and (f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme. <p>(regulation 16)</p>	Post Local Plan 2033 Adoption

<p>Monitoring of implementation of plans or programmes (regulation 17). Monitoring of significant environmental effects of the plan's or programme's implementation with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action (regulation 17 (1)). Monitoring arrangements may comprise or include arrangements established for other purposes (regulation 17 (2)).</p>	<p>Ongoing</p>
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2. PLANS, POLICIES, PROGRAMMES & SUSTAINABILITY OBJECTIVES

2.1 Links to Other Plans, Policies, Programmes and Sustainability Objectives

The SEA Directive requires consideration of the “relationship with other relevant plans and programmes”. A comprehensive assessment of the plans, policies and programmes, baseline and sustainability issues was undertaken as part of the SA/SEA Scoping Report (November 2015). The following sections update the 2015 Scoping Report.

Three key ‘Higher Level’ plans, policies and programmes warrant a particular focus – the NPPF, PPG and the Habitats Regulations requirements for HRA. Other PPPs are subsequently set out according to SA Framework objective below. In many cases, overarching international and high level documents may have not have informed the SA directly, but instead have been interpreted into national policies and guidance used to inform the Local Plan.

The National Planning Policy Framework (NPPF)¹ sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF guides all planning and development processes and is integral to the way that planning policy is formed.

The Planning Practice Guidance (PPG)² adds further context to the National Planning Policy Framework and it is intended that the two documents should be read together. There are 42 pieces of guidance on individual topics, including SEA and SA.

The Conservation of Habitats and Species Regulations 2010 require any plan or project not directly connected with, or necessary to the management of European designated sites, but which are likely to have a significant effect thereon, either individually or in combination with other plans or projects, to be subject to a Habitat Regulations Assessment (HRA). European designated sites (collectively termed Natura 2000 sites) comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) together with Ramsar sites which are afforded the same level of protection in the UK. The term HRA refers to the assessment of the implication of a proposed plan on one or more European designated sites in view of the sites’ conservation objectives. HRA is based on a rigorous application of the precautionary principle and therefore requires those undertaking the exercise to prove that the Plan will not have a significant effect on these conservation objectives. Where uncertainty or doubt remains, an adverse effect should be assumed. The impacts of the Local Plan on the following sites have been assessed in the Tandridge HRA

- Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC); and

¹ The NPPF is available here: www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

² The PPG can be found here: <https://www.gov.uk/government/collections/planning-practice-guidance>

The Mole Gap to Reigate Escarpment SAC.

2.2 Key Plans, Policies and Programmes

All SA objectives

International

- United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the 'Aarhus Convention') (1998):
- United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002):

National

- DEFRA Securing the Future: Delivering UK Sustainable Development Strategy (2011)

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

National

- NPPF 2012 6 - Delivering a wide choice of high quality homes
- Planning Practice Guidance (2014)
- Planning Policy for Traveller Sites 2015
- CLG, Designing Gypsy and Traveller Sites 'Good Practice Guide' 2008
- Housing and Planning Act 2016
- Emerging: Fixing our broken housing market – Housing White Paper (February 2017)

County/Local

- Surrey-I Housebuilding: permanent dwellings started and completed by tenure
- Tandridge Housing and Economic Land Availability Assessment (HELAA)
- Tandridge Strategic Housing Market Assessment (SHMA) 2015 and 2018
- Surrey Infrastructure Study
- Infrastructure Delivery Plan (2018)
- Housing Land Supply Topic Paper (2018)
- Tandridge District Housing Strategy (2018)
- Tandridge District Housing Strategy Position Statement 2017
- Spatial Approaches Topic Papers (2015, 2016 and 2017)
- Balancing Jobs and Homes Topic Paper (2016)
- Urban Capacity Study (2017)
- Settlement Hierarchy (2015)
- Settlement Hierarchy: Addendum (2018)

- Caterham Masterplan Supplementary Planning Document (2018)
- Green Belt Assessment (Part 3): Exceptional Circumstances and Insetting (2018)
- Tandridge Gypsy and Traveller Accommodation Assessment – January 2017
- Statements of Delivery 2018.

SA objective 2: To facilitate the improved health and well-being of the whole population

International

- World Health Organisation – World Health Report

National

- The Health and Social Care Act 2012
- Localism Act 2011
- National Planning Policy Framework 2012 -Health and well-being
- Planning Practice Guidance (2014)
- Public Health England – Disease and poor health in Surrey 2017
- Sport England 'Active Design'

County

- Surrey Joint Strategic Needs Assessment.
- Surrey's Physical Activity Strategy 2015-2020

Local

- Wellbeing Space Strategy Tandridge District 2015
- Tandridge Open Space Study (2017)
- Assessing Needs and Opportunities for Indoor Sports Facilities in Tandridge (December 2017)
- Tandridge Playing Pitch Strategy and Assessment (2018)
- Retail and Leisure study 2015 and 2018 update
- Equalities Assessment 2018 and Equalities Impact Assessment 2017,2016 and 2015

SA objective 3: To conserve and enhance archaeological, historic and cultural assets

International

- United Nations (UNESCO) World Heritage Convention (1972)
- European Convention for the Protection of the Architectural Heritage of Europe (1985)

National

- Historic England Corporate Plan 2016-2019
- Historic England - Good Practice Advice in Planning : 1 - The Historic Environment in Local Plans (2015)
- NPPF 2012 paragraph 17 and section 12
- Planning Practice Guidance (2014)

County/ Local

- Surrey Landscape Character Assessment: Tandridge District 2015
- Tandridge District Council – Conservation areas
- Surrey Historic Environmental Record

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

International

- UN, Mobilizing Sustainable Transport for Development. High-level Advisory Group on Sustainable Transport, 2016

National

- Department for Transport (DfT) 'Delivering a Sustainable Transport System'
- DfT 'Cycling and Walking Investment Strategy' (2017)
- DfT 'Road Investment Strategy 2015 -2020' (2014)
- DfT 'Transport Investment Strategy' (2017)
- NPPF 2012 Paragraph 17 and Section 4
- Planning Practice Guidance (2014)
- Network Rail 'Strategic Business Plan 2019-2024
- DfT 'Strategic Vision for Rail' (2017)
- Manual for Streets (2007)

- Manual for Streets 2: Wider Application of the Principles (2010)

Regional/County

- Surrey Local Transport Plan
- Local Transport Strategy for the District of Tandridge 2014
- Surrey Infrastructure Study 2016
- Gatwick Diamond Infrastructure Assessment 2016
- Strategic Highways Assessment Report 2015

Local

- Transport/Highways Assessment Reports 2018 & 2017 (Minerva Transport Modelling)
- Tandridge Open Space Study (2017)
- Retail and Leisure Study 2015 and 2018 Update
- Tandridge Retail Study Update 2018
- Tandridge Town and Local Centre Review 2018
- Caterham Masterplan Supplementary Planning Document (2018)

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

National

- NPPF 2012 Paragraph 111
- Planning Practice Guidance (2014)
- Land Value Estimates for Policy Appraisal – Department for Communities and Local Government 2015
- Building more homes on brownfield land – Department for Communities and Local Government 2015
- Town and Country Planning (Brownfield Land Register) Regulations 2017 & Town and Country Planning (Permission in Principle) Order 2017

Regional

- Gatwick Diamond Infrastructure Assessment (January 2016)

Local

- TDC Brownfield Sites Register
- TDC Housing and Economic Land Availability Assessment (HELAA)
- Tandridge Local Development Framework Green Belt Settlements Review 2010
- Housing Land Supply Topic Paper (2018)
- Tandridge Annual Monitoring Report
- Tandridge Economic Needs Assessment 2015 and 2017
- Tandridge Economic Proposition

SA objective 6: To support economic growth which is inclusive, innovative and sustainable and SA objective 7: To provide for employment opportunities to meet the needs of the local economy

International

- The New European Consensus on Development , 'Our World, Our Dignity, Our Future' (June 2017)

National

- HM Government - Industrial Strategy Green Paper (2017)
- HM Government - Fixing the Foundations: Creating a more prosperous nation (2015)
- NPPF (2012)
- Planning Practice Guidance (2014)

Sub-Regional/County

- Wandle Valley Corridor Initiative
- Gatwick 360 – The Coast to Capital Strategic Economic Plan (2018)
- Coast to Capital Strategic Economic Plan (2014), including M25 Growth Corridor
- East Surrey Rural Tourism Co-operation Project (2018)
- Coast to Capital Local Enterprise Partnership (LEP) - Rural Statement (2016)
- Surrey Futures Hotel Study 2015
- Gatwick Diamond Global Gateway
- Surrey County Council- The Gatwick Diamond
- Gatwick Diamond Infrastructure Assessment (January 2016)

Local

- Tandridge Economic Needs Assessment 2015
- Tandridge Economic Needs Assessment 2017
- Housing and Economic Land Availability Assessment (HELAA)
- Retail and Leisure Study 2015
- Tandridge Retail Study Update 2018
- Tandridge Town and Local Centre Review 2018
- Tandridge Economic Development and Business Study 2014
- Tandridge Economic Proposition Main Report, Profile, Delivery Plan
- Surrey Futures Hotel Study 2015
- Spatial Approaches Topic Papers (2015, 2016 and 2017)
- Tandridge DC Balancing Jobs and Homes Topic Papers (2016)
- Tandridge District Preferred Strategy Topic Paper (2017)
- Town and Local Centre Review (2018)
- Caterham Town Masterplan Supplementary Document (2018)
- RegenOxted

- Infrastructure Delivery Plan (2018)
- Functional Economic Area Topic Paper 2015

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

International

- Transforming our World: the 2030 Agenda for Sustainable Development (UN, September 2015)
- The New European Consensus on Development , 'Our World, Our Dignity, Our Future' (June 2017)
- The Paris Agreement on Climate Change (United Nations 2015, entered into force in November 2016)
- European Energy Performance of Buildings Directive (2010)
- Euro emission standards 2017
- The Energy Performance of Buildings Directive (EPDB) 2002/91/EC

National

- UK Government's Clean Growth Strategy (2018)
- A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- UK Government's Industrial Strategy (2017)
- TCPA Garden City Standards for the 21st Century 'Guide 4 - Planning for Energy and Climate Change.
- NPPF (2012)
- Planning Practice Guidance (2014)

Regional/ Local

- Surrey Climate Change Strategy 2009
- Surrey County Council – Surrey Energy and Sustainability Partnership
- Gatwick Safeguarding Zone (Restrictions on wind turbines and large banks of solar panels)
- Tandridge Air Quality Impact Assessment (2018)

SA objective 9: To use natural resources prudently

International

- European Waste Framework Directive (2008)
- European Landfill Directive (1999)

National

- National Planning Policy for Waste (2014)
- NPPF (2012)
- Planning Practice Guidance (2014)

County/Local

- Natural Resource Balance Sheet for Surrey 2004
- Surrey Minerals Plan 2011 Core Strategy Development Plan Document
- Surrey Minerals Safeguarding is supported by the Surrey Minerals Plan 2011 Core Strategy (Policy MC6), the National Planning Policy Framework (Paras 143 & 144) and National Planning Policy Guidance (Para 003).
- The Surrey Minerals Plan Minerals Site Restoration Supplementary Planning Document (SPD)
- Surrey Waste Plan 2008
- Emerging Surrey Waste Local Plan 2018

SA objective 10: To adapt to the changing climate

International

- European Union Environmental Action Programme to 2020
- Transforming our world: the 2030 Agenda for Sustainable Development (UN, September 2015)
- The New European Consensus on Development , 'Our World, Our Dignity, Our Future' (June 2017)
- The Paris Agreement on Climate Change (United Nations 2015, entered into force in November 2016)

National

- Adapting to Climate Change – UK Climate Projections 2009 - Department for Environment, Food and Rural Affairs (DEFRA)
- NPPF (2012) paragraphs 93 to 108
- Climate Change Act 2008
- The National Adaptation Programme – Making the Country Resilient to a Changing Climate (2013)

Regional/ Local

- Surrey Local Area Agreement (2008-11)
- Surrey Energy and Sustainability Partnership (2018)
- Surrey Climate Change Strategy (2009)
- Strategic Risk Flood Assessment
- TDC Key Objectives 11/12

SA objective 11: To reduce flood risk

International

- European Floods Directive (2007)

National

- Flood and Water Management Act (2010)
- NPPF (2012) paragraphs 93 to 108
- Planning Practice Guidance (2014)
- DEFRA/DCLG report 'Delivering Sustainable Drainage Systems' (2014)
- Non-Statutory technical standards for sustainable drainage systems 2015
- The CIRIA SuDS Manual C753 [Published by CIRIA] 2007
- RSPB/WWT 'Sustainable Drainage Systems - Maximising the potential for people and wildlife. A guide for local authorities and developers'. 2012.

Regional / Sub-Regional / County

- South East Lead Local Flood Authorities 'Water, People, Places'
- The Surrey Local Flood Risk Management Strategy (2017-2032)
- Thames Catchment Flood Management Plan 2009
- Surrey Preliminary Flood Risk Assessment 2011
- Thames River Basin District Flood Risk Management Plan (Environment Agency, December 2015)

Local

- Section 19 Flood Investigation Report: Tandridge 2015
- TDC Strategic Risk Flood Assessment (2015, 2016, 2017 and 2018)
- Caterham Bourne Flood Alleviation Scheme
- Surrey County Council Assessment to reduce flooding in the Burstow Stream catchment including Smallfield
- Caterham Bourne Section 19 Flood Investigation Report 2015
- Caterham on the Hill Section 19 Flood Investigation Report 2016

- Caterham on the Hill Surface Water Management Study 2016

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

International

- European Water Framework Directive (2000)
- European Urban Waste Water Directive (1991)
- European Drinking Water Directive (1998)

National

- NPPF (2012)
- Planning Practice Guidance (2014)

Regional/County

- The Surrey Local Flood Risk Management Strategy
- Section 19 Flood Investigation Report: Tandridge 2015
- Environment Agency - South East River Basin Management Plans
- Environment Agency - Thames River Basin District Flood Risk Management Plan (Environment Agency, December 2015)

Local

- TDC Strategic Risk Flood Assessment(2015, 2016, 2017 and 2018)
- Tandridge Habitats Regulations Assessment
- Tandridge Water Cycle Study

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

National

- Natural England (2012) Natural England Technical Note TIN049 Agricultural Land Classification: protecting the best and most versatile agricultural land
- Safeguarding our Soils (2009)
- NPPF (2012) paragraph 143

Local

- TDC Contaminated Land Inspection Strategy 2011

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

International

- The Air Quality Framework Directive 2008/50/EC
- European Air Quality Framework Directive (1996)
- European Noise Directive (2002/49/EC)
- European Nitrates Directive (1991)
- European Industrial Emission Directive (2010)
- Council of European Communities (2008), Ambient Air Quality and Cleaner Air for Europe Directive (2008/50/EC)
- Council Directive 1999/30/EC of 22 April 1999 relating to limiting values for sulphur dioxide, nitrogen dioxide and oxides of nitrogen, particulate matter and lead in ambient air Official Journal L 163, 29/06/1999 P. 0041 – 0060 Council Directive 2000/69/EC of the European Parliament and of the Council of 16 November 2000 relating to limiting values for benzene and carbon monoxide in ambient air
- Council Directive 2002/3/EC of the European Parliament and of the Council of 12 February 2002 relating to ozone in ambient air
- Directive 2004/107/EC of the European Parliament and of the Council of 15 December 2004 relating to arsenic, cadmium, mercury, nickel and polycyclic hydrocarbons in ambient air

National

- Department for Environment Food and Rural Affairs (Defra) (2007), The Air Quality Strategy for England, Scotland, Wales and Northern Ireland
- Emerging: Tackling nitrogen dioxide in our towns and cities – A consultation and Clean Air Zone Framework (DEFRA & DfT, May 2017)
- H.M. Government (2010) The Air Quality Standards Regulations. SI 1001, the Stationary Office
- H.M. Government (1995), The Environment Act
- Local Air Quality Management Technical Guidance LAQM.TG(16). April 2016. Published by Defra in partnership with the Scottish Government, Welsh Assembly Government, and Department of the Environment for Northern Ireland
- Design Manual For Roads And Bridges Volume 11 Environmental Assessment Section 3 Environmental Assessment Techniques Part 1 Ha 207/07, Available at: <http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf>
- EPUK & IAQM Land-Use Planning & Development Control: Planning For Air Quality (2017)

Regional/County

- The Surrey Transport Plan – Appendix 2 to the Environmental Report – Review of District & Borough Environmental Baselines 2011
- Surrey Local Transport Plan –including Surrey Transport Plan Air Quality Strategy
- Surrey Air Alliance (including Air Quality Strategy 2016, Draft Low Emissions Strategies, Electric Vehicle Charging policy and Air Quality Planning Conditions)
- Health Strategy (2017) Surrey Air Alliance
<https://www.surreyi.gov.uk/ViewPage1.aspx?C=resource&ResourceID=1800>

Local

- Air quality- Tandridge District Council/2017 Air Quality Annual Status Report (ASR)
- Tandridge Habitat Regulations Assessment
- Aecom, Air Quality Impact Assessment (AQIA) into Local Plan and Garden Villages 2018
- Aecom, Air Quality Assessment of Ashdown Forest SAC 2018
- Aecom, Air Quality Assessment of Mole Gap to Reigate Escarpment SAC 2018

SA objective 15: To protect and enhance landscape character

International

- European Landscape Convention 2009

National

- Landscape character assessments: identify and describe landscape types (2014)
- National England, Access to evidence: National Character Areas
- DEFRA 'A Green Future: Our 25 Year Plan to Improve the Environment' (2018)

Regional

- Surrey Hills AONB Management Plan 2014-2019
- High Weald AONB Management Plan 2014-2019
- A Living Landscape for Surrey (SWT 2014)
- Local Transport Strategy for the District of Tandridge: Environmental Assessment of Plans & Programmes Regulations 2004, Regulation 9 Screening Report – October 2014.
- Surrey Hills Area of Greater Landscape Value (AGLV) Review 2007
- Management Plan 2017-2019
- Surrey Landscape Character Assessment Report 2015
- Surrey Landscape Character Assessment 2015:Figure 1-11
- Surrey Landscape Charter Assessment 2015- Appendix 1
- Landscape Character Assessment: Tandridge District April 2015

Local

- Tandridge Landscape Capacity and Sensitivity Studies (2016, 2017 and 2018)

- The Environment Partnership – Tandridge Ecological Assessment.
- Tandridge District Landscape and Visual Assessment For a Potential Garden Village Location (August 2017) (Rev C)
- Landscape and Visual Assessment - Concept areas 2016
- Landscape Capacity and Sensitivity Study Oct 2016 (LCSS)
- Surrey Landscape Character Assessment 2015 – Tandridge

SA objective 16: To conserve and enhance biodiversity

International

- International Convention on Wetlands (Ramsar Convention)
- European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979)
- International Convention on Biological Diversity (1992)
- European Habitats Directive (1992)
- European Birds Directive (2009)
- United Nations Declaration on Forests (New York Declaration) (2014)

National

- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
- Ancient Woodland Inventory 2011
- Government White Paper, The Natural Choice: securing the value of nature (2011)
- Natural England Nature Nearby - Accessible Natural Greenspace Guidance (NE265) (2010)
- Woodland Trust 'Impacts-of-nearby-development-on-the-ecology-of-ancient-woodland-addendum.pdf'
- Woodland Trust 'trees in residential developments':
- Woodland Trust (2010) Space for people. Woodland Trust Research Report
- Woodland Trust 'Residential Development & Trees' (2015)
- Design Manual For Roads And Bridges Volume 11 Environmental Assessment Section 3 Environmental Assessment Techniques Part 1 Ha 207/07
- DEFRA 'A Green Future: Our 25 Year Plan to Improve the Environment' (2018)
- TCPA 'Biodiversity by Design: a guide for sustainable communities (2004)

Sub-Regional/County

- Surrey Biodiversity Information Centre 2007
- Surrey Nature Partnership/ Natural Capital Investment plan for Surrey
- Surrey Nature Partnership 'Biodiversity & Planning in Surrey' (November 2018)
- Surrey Woodland Survey Report 2011
- A revision of the Ancient Woodland Inventory for Surrey Report and Inventory Maps June 2011
- Surrey Nature Partnership Biodiversity Opportunity Areas: the basis for realising Surrey's ecological network, December 2015
- Footprint Ecology, Ashdown Forest SPA Monitoring Strategy (2018)
- Footprint Ecology, Ashdown Forest Visitor Survey 2016 (published 2017)

Local

- TDC Habitat Regulations Assessment (HRA)
- Aecom, Air Quality Assessment of Ashdown Forest SAC (2018)
- Aecom, Air Quality Assessment of Mole Gap to Reigate Escarpment SAC (2018)
- Ecological appraisals of potential Garden Village Locations: Tandridge and Adjoining Authorities (2017)
- Site Based Ecology Assessments and Appraisals
- TDC Trees and Soft Landscaping Supplementary Planning Document (2017)

3. ENVIRONMENTAL REPORT & SUSTAINABILITY ISSUES

3.1 The Requirement for an Environmental Report

Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 sets out the formal requirements of an 'environmental report', which should form an integral part of the sustainability appraisal report and is a core output of any strategic environmental assessment.

Cross-reference should be made to the most recent Tandridge SA Scoping Report (November 2015) [here](#) which identifies relevant environmental, economic and social issues and objectives at a District wide level. The following sections elaborate further environmental, economic and social issues and objectives that are specifically relevant to Tandridge District and the wider area. This is largely derived from the key messages from the review of relevant Policies, Plans and Sustainability Objectives and the identified issues reflected in the objectives set out in the Sustainability Appraisal Framework.

Whilst the objectives have been categorised according to SA Objective, it should be noted that this sub-division is not necessarily a clear distinction - to some extent, all objectives have a wider environmental, social and economic implication. However, for the purposes of the assessment, the objectives have been apportioned to the category where effects are considered most likely to be significant.

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

As of 2018, the population of Tandridge is estimated at 88,200, most living in our more built-up areas of Oxted (including Hurst Green and Limpsfield) and the wider Caterham area (including Caterham Valley, Caterham on the Hill, Whyteleafe and Warlingham). The rest of the population resides in a network of smaller towns and villages, much of their setting derived from the countryside that surrounds them.

Tandridge is the 9th most populated district in Surrey in 2018. The population of the District rose from 79,267 in 2001 to 82,998 in 2011; an increase of 4.7% over 10 years. This level of growth is lower than the 6.9% growth experienced across the whole of Surrey within the same period. The Plan faces the challenge of housing the increasing population.

Tandridge has a higher than average number of residents aged 65 and over (20.4%, compared to 17.8% nationally). This trend is set to continue over the next 20 years, with this age group forecast to grow by over 50%. Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people to allow them to live independently and safely in their own homes for as long as possible, or to move to suitable accommodation if they so wish. This provides wider benefits as it can help reduce the costs to health and social services.

The county of Surrey (of which Tandridge is part of) at the end of 2016 had comfortably the most expensive median house price in the country. Of the 11 local authorities in Surrey at the end of 2016, Tandridge had the 6th highest median house price. The median house price in Tandridge increased by 30% between 2011 (£300,000) and 2016 (£390,000).

The average median house price of £390,000 in Tandridge was 14.78 times the median gross annual workplace based earnings in the same year, which was £26,382. Tandridge is the fourth least affordable local authority area in Surrey. The high ratio indicated here raises a doubt over the affordability of homes in Tandridge for residents who are working in the District. Please refer to the various ONS tables in Appendix 1 Baseline information for Median house prices.

According to the 2011 Census, over 60% of the total households in Tandridge are occupied by one or two people only - nearly 27% are single person occupied dwellings. Home ownership far outstrips the national average, where nearly 75% of all homes in the District are either owned outright or with a mortgage. Despite this, 11% of the total housing stock is public sector housing and over 1,300 households are on the Council's housing waiting list. Affordable housing is currently defined as that which includes social rented, affordable rented and intermediate housing and which is provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and house prices.

The need for affordable homes within the District is confirmed by the extent of the Council's housing waiting list and the evidence which underpins the Local Plan. This includes the

Council's Strategic Housing Market Assessment (SHMA) 2015 and the SHMA update of 2018, which gives a clear idea of the extent of that need. The affordable housing need identified in the SHMA update is for 391 dwellings per year over the first five years of the Local Plan (comprising backlog and newly arising need), before reducing to 310 affordable dwellings per year for the remaining plan period.

Tandridge is a predominantly rural district. Many rural settlements, being in unsustainable locations, are unlikely to benefit from the affordable housing secured through normal planning applications. This can lead to an imbalance in the demographics and contrary to the NPPF's (2012) core principle of supporting thriving rural communities.

There are limited options for downsizing to smaller homes, with over 30% of the District's housing stock being 4/5 bedroom detached homes on large plots (far higher than the national average of 19%).

Tandridge District's housing evidence in the form of the 2015 SHMA's objectively assessed need says that the District requires 9,400 homes or 470 homes per year (total of all tenures).

The Council's Housing Strategy will be key to delivering the right housing in this District and it is being developed to complement a number of corporate strategies, plans, policies and projects. It will adopt a whole housing market approach. It will not just focus on housing for those in highest housing need, but also those in specialist need. The latter include the elderly, those needing entry level homes and those wishing to build their own homes through the self-build initiative, for example. It will also assess the level of empty or under-utilised homes and set out a strategy for bringing some of these back into use.

The Government's Planning Policy for Traveller Sites (PPTS) (2015) emphasises the importance of assessing the accommodation needs of these specific groups and taking a strategic approach to meeting identified need. In Tandridge there is 1 public site (15 pitches), 5 private sites (27 pitches), 1 site with temporary permission (1 pitch), 5 unauthorised sites (17 pitches), and 4 private Travelling Showpeople yards (53 plots). The 2017 updated Gypsy and Traveller Accommodation Assessment (GTAA) identifies a need for 5 additional pitches for Gypsies and Travellers and 21 plots for Travelling Showpeople for the plan period up to 2033.

SA objective 2: To facilitate the improved health and well-being of the whole population.

Introduction

Health is influenced by a wide range of social, economic, and environmental determinants inherently linked to quality of life. These include earning a living wage and access to employment as well as community and healthcare facilities, appropriate and good quality housing, and access to open spaces.

The wider links between health, education, community and planning are highlighted by the National Planning Policy Framework which acknowledges the role that the planning system can play in facilitating social interaction and creating healthy, inclusive communities. It emphasises the importance of working with public health partners to understand and take account of the health status and needs of the local population, including expected future changes, and barriers to improving health and well-being.

The Health and Social Care Act 2012, and changes to the planning system through the Localism Act 2011 and the National Planning Policy Framework 2012, have resulted in local government being required to give greater consideration to local health and well-being in formulating policies and making planning decisions.

Health Facilities

There are no high-order hospitals (i.e. that include Accident and Emergency departments) located within Tandridge District and residents need to travel to neighbouring facilities at East Surrey Hospital, Crawley, Sevenoaks, Mid Sussex, Bromley, Croydon and Epsom to receive urgent and/or complex medical care. However, there is a well-used minor injuries unit within the Caterham Dene Community Hospital.

As indicated by Figure O2.3 in Appendix 1 Baseline information, 18% of all patients seen at East Surrey Hospital were from Tandridge with just under 93,000 admissions and attendances. This represents 29,000 individual people, which given that the population of Tandridge is 86,700; this means that almost one in three Tandridge residents were seen at the hospital last year (Source: East Surrey Hospital).

The Clinical Commissioning Group located nearest to Tandridge is East Surrey, which has a membership of 18 GP practices and commissions healthcare for 170,000 people living in Tandridge and Reigate and Banstead (Source: www.surreydownsccg.nhs.uk).

There are 10 doctors' surgeries within the District. There are existing capacity deficits in our GP surgeries that are likely to be exacerbated by our ageing population.

Combined with an ageing population, our health services and open spaces will be subject to increased demand from residents.

Health of Residents

The health of people in Tandridge is generally better than the England average.

Life expectancy for both men and women is higher than the England average. However, there are notable health inequalities - Life expectancy is 3.5 years lower for men and 6.8 years lower for women in the most deprived areas of Tandridge than in the least deprived areas.

The 2011 Census showed that the general percentage of those in bad health for individuals in Tandridge was just higher than the percentage for Surrey, but lower than the percentage for the region and significantly lower than the percentage for the country.

The Tandridge Housing Needs Study 2005 indicates that 14.4% of households include a member with a disability and 6.9% of all dwellings have been adapted to meet the needs of a disabled person.

Despite 62% of adults meeting the recommended 150 minutes weekly exercise, over 65% of adults in Tandridge are overweight or obese, as well as over 25% of children aged 10-11 years old.

In Year 6, 14.8% (105) of children are classified as obese, better than the average for England. Levels of teenage pregnancy, breastfeeding initiation and smoking at time of delivery are better than the England average.

The rate of alcohol-related harm hospital stays is 522, better than the average for England. This represents 452 stays per year. The rate of self-harm hospital stays is 194*. This represents 164 stays per year. Estimated levels of adult excess weight are better than the England average. The rate of people killed and seriously injured on roads is worse than average. Rates of sexually transmitted infections and TB are better than average. Rates of violent crime, long-term unemployment, early deaths from cardiovascular diseases and early deaths from cancer are better than average.

Local priorities in Tandridge include alcohol, mental health, healthy weight and ageing well.

Sport and Recreation Facilities

Tandridge residents generally have good access to high quality sports and recreation facilities and open spaces, with three quarters of residents accessing open spaces weekly - some 56% of those doing so for the health and well-being benefits. Some facilities and spaces are, however, in a poor state of repair and in need of improvement.

Implications for the way that sports and recreation facilities will be planned in the future will need to be altered as it is generally the younger age group (between 16 and 45 years) who participate in sport and recreation, yet it is estimated that there will be a higher proportion of the 55+ age group in the future.

SA objective 3: To conserve and enhance archaeological, historic and cultural assets.

Tandridge has a valuable historic environment containing many significant heritage assets including buildings and places which all make a positive contribution to the local character, culture, environment, communities and economy. The District contains 19 Conservation Areas (see Appendix 1 Objective 3) and almost 600 listed buildings, alongside locally recognised buildings of character, two Grade II Registered Parks & Gardens (Titsey Place and Greathed Manor), over 250 areas of Ancient Woodland, twenty-three scheduled monuments and numerous identified areas of archaeological importance or potential.

The District’s conservation areas play a vital role in protecting the settings of our much-valued historic natural environment and built-form. These designations will require a review and associated management plans in order to ensure they continue to protect relevant areas in an appropriate way. These reviews will take place in co-ordination with Surrey County Council Conservation Team and Historic England.

In addition, the countryside is interspersed with a range of attractive and historic settlements which contribute to the District’s diverse and rich heritage. Many areas within the District’s rural settlements contain highly attractive townscapes that have been in place for centuries and which make a major contribution to the character of the District.

Historic England have published a Historic Environment Good Practice Advice note for local authorities preparing Local Plans, the purpose of which is to aid in implementing historic environment policy in the NPPF. The advice note states 'conservation is certainly not a stand-alone exercise' and recommends that inter-relationships between the historic environment and other factors such as town centre viability, protection of Green Belt, good design and delivery of high quality homes, are considered. With this in mind, applications will be required to consider the wider impacts of any changes to the setting of our historic assets, not just immediate effects.

Heritage assets are an irreplaceable resource and the Council will need to positively plan for their conservation to ensure they are enjoyed both now and by future generations. Protection of the District’s historic assets will also support the tourism economy and create attractive areas for businesses to locate to and the same applies with the social aspect, within the respective areas the objective will maintain a high quality built environment.

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

Introduction

Tandridge hosts significant transportation infrastructure, including London’s Orbital M25 running east to west and the M23 running north to south along the western boundary. The A25 runs parallel but slightly south of the M25 and the A22 runs north to south through the centre of the District.

The District is well-served by and in proximity to nationally significant infrastructure such as the M25, M23 and Gatwick Airport. But much of our more local transport network (A22, A25, railway stations and rural roads) have capacity issues and are subject to congestion and service disruption.

Road

Surrey’s road network has developed over many years to suit the prevailing movement demands. The strategic network, comprising motorways and trunk roads, has evolved principally to serve London, with several nationally important routes passing through the county, including the M3, M23, M25 and the A3.

The road network in the District can be split in terms of responsibility between the County Council and the Highways Agency. The Highways Agency is responsible for the M25 and M23 in Tandridge, whilst the County Council is responsible for the remainder of the public road network.

The 2011 Census shows that Surrey has the highest levels of car ownership (i.e. cars per household) nationally and Tandridge is the fourth highest in the county. 49% of Tandridge households (this has grown dramatically since 2001 when it was 33%) has 2 or more cars (compared with 32% for England), and only 12% households are without a car (compared to 26% for England).

Surrey has relatively high levels of usage on its roads and there are particular congestion issues in many areas of East Surrey at peak times. There are significant volumes of traffic passing through the District including on the M25 and M23. In part this is due to:

- a) Gatwick Airport which employs approximately 25,000 on airport; and
- b) The pattern of residents choosing to live further out from London than their place of work, resulting in an inward drift of traffic in the morning peak and outward drift in the afternoon/evening peak.

The M25 passes east to west through the northern part of the District. Junction 6 of the M25 is at Godstone. The M25 is of strategic transport importance and can have a large impact on the Tandridge transport network when severe congestion occurs between Junctions 5 and 7. This can result in associated congestion at Junction 6 (Godstone) leading to severe congestion on the A22 and A25 corridors. Severe congestion on the M25 between Junctions 5 and 7 can also result in problems when travelling to and from Gatwick Airport via the M23. The M23 running north to south cuts through the western part of the District, joining the M25 at Merstham at the border between Tandridge and Reigate and Banstead.

Roads outside of the District boundary also impact upon the Tandridge road network. The M25 and A23 merge at Hooley in Reigate and Banstead, which can cause congestion in the A23 corridor in this part of northern Surrey. Local MPs have lobbied the transport minister about the Government's commitment to progress a new interchange between the A23 and the M25 at Hooley which would allow M25 traffic direct access to the Redhill area. The Highways Agency has collected data and is currently reviewing investment options for the A23 corridor. It is not yet known whether a new interchange at Hooley will be included in the Highways Agency Trunk road investment programme. A number of A and B roads pass through the District.

The A roads consist of the A25 (which is part of the tactical diversion route when the M25 is closed due to incidents), the A22 and A264. The A25 runs east to west across the District from Sevenoaks in the east to Reigate and Banstead Borough to the west. The A22 runs north to south entering the District at Whyteleafe in the north and leaving the District at Felbridge in the south. Lastly the A264 passes through the south west corner of the District and joins up with the A22 at Felbridge.

B roads in the District include the B269 which enters the District at Hamsey Green and leaves the District at Limpsfield Chart going into Kent and the B2024 which connects with the B269 at Botley Hill and runs into Kent leaving the North Downs just below Tatsfield.

Tandridge District is predominately rural, its location on the edge of London, and on national routes to and from the channel ports, contributes to a number of Heavy Goods Vehicle problems for its communities. Many of the District's rural settlements are located away from the primary road network and rely on narrow rural lanes for access and movement. These lanes are not suitable for heavy traffic use, nor for major improvement since they contribute positively to the rural character of the area.

Rail provision

There are currently 84 railway stations in Surrey and the county is served by an extensive rail network, 11 of which are in Tandridge District. Rail services into London via the East Grinstead and Uckfield lines and Caterham branch are generally good. The District is crossed by the Redhill to Tonbridge line; however services are infrequent. The frequency of the Caterham service is four trains per hour, serving Victoria and London Bridge. Public transport in the District is well served by railways both east/west and north/south. The sole east/west railway runs between Redhill and Tonbridge with two stations in the District, namely Godstone and Nutfield. Due to a large percentage of the working population commuting to London, the majority of these journeys are made by public transport, mainly by rail. 2011 Census information indicates that a higher proportion of Tandridge residents than nationally travel to work by train (18% against 7%).

Bus provision

The local bus network is an integral part of the transport system in Surrey providing valuable transport provision to communities and supporting the economy. Some of the more urbanised areas of Surrey and particularly those areas bordering London are relatively well served by bus services. 2011 Census information indicates a low proportion in Tandridge travel to work by bus, only 2% against 8% nationally.

Walking and Cycling

There is around 580km of public rights of way in Tandridge offering opportunities for walking and cycling in both rural and urban areas. Paths vary considerably in nature but offer significant potential to help deliver sustainable transport improvements. Tandridge is mainly rural in nature and as a result offers many opportunities for leisure cycling. The quiet country roads, in particular, offer leisure rides for the whole family. There are three existing signed cycle routes: National Cycle Route 21, Surrey Cycleway and Yew Tree Way. The Surrey Hills run through the northern part of the Tandridge District providing a pathway for pleasant walking. The major routes include the North Downs Way National Trail route runs in the District between Ockley Hill and south of Tatsfield and the Greensand Way runs from South Nutfield to Limpsfield Chart via Oxted.

Air

Tandridge District is in close proximity to Gatwick Airport; which borders the District to the south west. Currently it is quickest to travel to both Gatwick and Heathrow airports by car from nearly everywhere in Surrey, even at peak times. Over 50% of passengers from Gatwick Airport travel by car, as do employees. By rail, there is no direct access to Gatwick Airport from the District. People travelling to Gatwick are required to travel via East Croydon in Greater London making travelling by car more attractive. A new service between Kent and Gatwick Airport on the Tonbridge-Redhill Line would benefit the area east of Gatwick Airport. Links between Kent and Gatwick Airport are important and improved links and services via Tonbridge would provide effective rail links to and from Ashford International with connections to Eurostar services as well as Gatwick Airport. This service would help to contribute to increasing access to and from the airport by public transport and could assist in reducing traffic on the M25 through Tandridge District, reducing the associated carbon emissions as well as providing a much needed link between Kent and Gatwick Airport. Access by road from the northern part of the District is by the M25 and M23. Access by road to Heathrow airport is by the M25 and M4.

In addition, there are a number of more recreational and private aviation facilities are located just beyond the boundaries including Redhill Aerodrome and Biggin Hill Airport. Kenley Aerodrome is also just north of the District boundary and is used primarily by gliders.

Coordination with Other Plans & Strategies

The Local Transport Strategy (LTS) for the district of Tandridge is one of a number of strategies that have been produced by Surrey County Council as the means of implementing the aims and objectives of the Surrey Transport Plan. The Tandridge LTS has been developed to identify the key factors that will need to be addressed to manage future growth in demand for travel within the district of Tandridge. The LTS will provide a framework that enables the District Council and the County Council to engage and work with relevant partners to promote and secure investment in transport infrastructure and services, to the benefit of the District's residents and businesses.

Public transport to both airports needs to be faster with more direct services from Surrey towns to provide an alternative to car travel for passengers and employees. The main bus services to Gatwick from the District are from Godstone and Caterham with services every 30 minutes. An hourly service is available from Smallfield. Rail access to Heathrow airport from the District requires travelling to London Victoria to connect to services to Heathrow. As an example journeys from Oxted take over 2 hours whilst travelling by car is only an hour meaning travelling by car is far more attractive. Potentially in the future the reintroduction of a rail service between Kent and Gatwick Airport using the Redhill-Tonbridge railway line would improve public transport to and from the airport.

The potential of this rail service is likely to depend on whether additional airport capacity will be located in Gatwick or supported at other airports. This scheme has been submitted for inclusion into the Coast to Capital Strategic Economic Plan.

Govia Thameslink Railway (GTR) recently downgraded the Tonbridge to Redhill line which will adversely affect the accessibility of Tandridge District and which will need to be closely monitored, including via lobbying DfT, to ensure Tandridge District is not adversely affected.

Whilst the transport network serves to facilitate movement around the District and includes key regional links, some of the characteristics of the network itself act as constraints to its performance. These include:

- Due to the size and rural nature of the District there is poor public transport accessibility from rural areas leading to a high dependency on the use of a car
- The hilly topography of the northern part of the District can make sustainable travel solutions less feasible
- The A25 and A22 corridors are tactical diversion routes for when incidents on M23 and M25 occur leading to very high levels of traffic congestion
- Due to the strategic location on the boundary of Greater London many people commute out of the District leading to congestion and a lack of car parking at rail stations
- The District contains national routes to and from the channel ports contributing to a number of HGV problems for the District's communities
- There are significant gaps in pedestrian and cyclist infrastructure especially on the A22 and A25 corridors

This strategy seeks to promote schemes which help address these problems where feasible. The problems listed above contribute to congestion on the road network which results in unreliable journey times and related delay. Travel behaviour and high dependency on the private car also contributes to congestion, particularly during peak travel times. This strategy seeks to address all modes in order to encourage travel by more sustainable means than the private car.

The East Surrey Rural Transport Partnership (ESRTP) coordinates a range of travel options which are open to anyone who needs help getting around Tandridge, whether that is to attend a hospital appointment, visit the shops or see friends.

Services

Tandridge District is bordered by Bromley, Crawley, Croydon, Reigate and Banstead, Mid-Sussex, Wealden and Sevenoaks. The District contains two designated town centres and a number of large and smaller villages. Caterham Valley and Oxted are the principal town centres. Caterham Hill, Lingfield, Warlingham and Whyteleafe are local centres catering for local needs. In addition to these centres designated in the development plan there are small village centres at Godstone and Smallfield and other local shopping facilities.

Tandridge is home to three secondary schools, and 25 primary age schools - all of which are state run, academies or church schools. De Stafford, Oxted and Warlingham offer the District secondary provisions for those aged 11 -16. Oxted and Warlingham also provide sixth form education. There is no college provision within the District. There is also a number of independent schools which offer private education, but which are not covered by this policy as they are more self-regulated in terms of the admissions process and their contribution to

meeting the educational needs of all, and they are not under the control of the education authority.

There are five libraries in the District and the County Council consider this to be sufficient to serve the population, however, they have identified the need for an extension to the existing library in Caterham on the Hill and the County Council has recently begun consultation on reducing library services. Lingfield and Warlingham Libraries are potentially at risk as they are both among the 10 least used libraries in the county.

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

In Tandridge most housing development in the last few years has taken place on brownfield land. The 2016/17 AMR indicated that 94% of housing development had been on previously developed land (PDL) using the original PDL definition³. However, since the definition changed to exclude garden land from the definition the percentage has dropped to around 77% (AMR 2018), or 90% using the original definition.

The level of commercial development built on brownfield land in Tandridge is normally 100%, reflecting the re-use of existing employment land. If the rate drops below this, it is often due to the re-use of agricultural buildings (being classified by the Government as greenfield sites).

It is also noteworthy that, in accordance with the Town and Country Planning (Brownfield Land Register) Regulation 2017, the Council has prepared a Brownfield Register. The purpose of the Brownfield Register is part of the Government's initiative to increase housebuilding and is intended to provide developers with a simple means of identifying developable brownfield sites and to grant Permission in Principle for residential led development on those sites that are included on the Register, where applicable. The Brownfield Register has used the HELAA as a starting point for identifying sites but has also looked at existing planning permissions to identify further suitable brownfield sites. The Brownfield Register will be reviewed annually and can be found in the Appendix 1 Baseline Information.

Whilst the Council has successfully ensured most development over the last few years has been on brownfield sites, it will not be possible for this pattern to continue given the challenges of accommodating current housing targets. Much evidence work (Housing and Economic Land Availability Assessment (HELAA), Urban Capacity Study (UCS), Housing Land Supply Topic Paper (2018) and Brownfield Register has already been undertaken in order to understand the capacity our existing built areas have to absorb further development and enable the Council to defend against Green Belt release. As a result it is apparent that the remaining opportunities on previously developed land are now limited. This is primarily because in past years development has always been concentrated to the same areas to the point where capacity is reaching exhaustion. Over time, the number of non-Green Belt brownfield and previously-developed sites, such as old hospitals, military barracks and other

³ In June 2010, The Government excluded garden land from the definition of previously developed land.

disused sites, have been depleted, having already been used. Remaining brownfield sites are often existing employment sites and located away from our sustainable settlements. As a result, the Council faces a difficult challenge when considering greenfield sites suitability for development.

SA objective 6: To support economic growth which is inclusive, innovative and sustainable and SA objective 7: To provide for employment opportunities to meet the needs of the local economy.

National Context

The National Planning Policy Framework places great emphasis on the role of the economy in achieving sustainable development, and states that 'planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century.

An Advantageous Location

Tandridge is situated within the economic powerhouse of the South East and is one of the 20% least deprived districts/unitary authorities in England. Tandridge District has clear locational economic advantages as it is situated within key growth areas such as the Gatwick Diamond, M25 Corridor and Coast to Capital (all of which are discussed later in this section). It also has access to Gatwick Airport in under 30 minutes, Heathrow in under an hour as well as direct access to the M25 and wider strategic road network. With 11 stations in the District, our residents and workers have access to wider travel including fast trains to London in just over half an hour and connections to a range of other locations including Redhill, East Grinstead and the South Coast.

Issues and Challenges

Despite these advantages, there are perceived to be a number of barriers preventing Tandridge from maximising its potential as a place to do business and its ability to perform better. Such barriers include road congestion, rail disruption, availability of commercial space and a lack of high-value employment opportunities. In some parts of the District, broadband services are limited. Across a number of key measures Tandridge is performing poorly in relation to other Surrey districts & boroughs. Within the key GVA (Gross Value Added) indicator Tandridge is the second lowest across all local authorities within both Coast to Capital and Enterprise M3 Local Enterprise Partnership areas (out of twenty-nine in total). Tandridge also performs the worst in Surrey in terms of UK Competitiveness (see Appendix 1

- O6/7.8) and has the lowest GDP. Although unemployment levels are relatively low, with 1.0% of the working age population claiming unemployment benefits (compared to 2.2% nationally), this is the joint-highest figure in Surrey. Levels across wards vary from 0.3% in Dormansland and Felcourt to 2.3% in Whyteleafe.

Similarly, in terms of earnings, it can be seen (in tables O6/7.1 and O6/7.2 in Appendix 1) that:

- In 2016 the county of Surrey had the highest median gross annual workplace-based earnings in the country.
- In 2016 the district of Tandridge had the lowest median gross annual workplace-based earnings out of all 11 local authority areas in Surrey.

Tandridge is in some ways a paradox - it has a high economic activity rate combined with low levels of unemployment. However it has an extremely low job density (0.78 compared to south-east England figure of 0.88 – see Table O6/7.4 in Appendix 1). In other words there are considerably fewer jobs than there are workers. This is manifest by the very high out-commuting that takes place with a net out-commuting of over 10,000 people per day. This demonstrates that there is a considerable reliance on jobs outside the area.

Based on the 2011 Census, 8,969 people live and work in Tandridge, which represents 28.4% of all employed residents in the District. This indicates that a high proportion of residents commute out of Tandridge to work (71.6%), with a flow of around 12,500 commuters to Greater London and 3,500 to Reigate and Banstead. On the one hand London relies on commuters from areas like Tandridge and on the other hand residents of the District rely on London for employment.

Employment Sectors

Compared to the national and regional averages Tandridge residents are over-represented in finance, insurance, professional, scientific and technical activities, which tend to be higher value employment sectors. As Table O6/7.11 in Appendix 1 Baseline Information indicates, the Tandridge workforce comprises high proportions of 'Managers, Directors and Senior Officials' and 'Associate Professional & Technical Occupations'. Conversely, a lower percentage of our resident workforce works in Group 2: Professional Occupations and generally there tends to be fewer Tandridge residents working in Groups 4 and 5, the administrative occupations and skilled trades. The high number of people employed in Group 6 (Caring, Leisure and Other Service Occupations) and the lower numbers in Groups 4 and 5 indicates a lack of intermediate skills which could hold some residents back from higher-skilled employment as well as possibly constraining growth.

Tandridge's working age residents are highly skilled with more than 46% qualified at NVQ Level 4+, although most of those skills are used in jobs outside of the District given the predominance of low-skilled employment opportunities in the District. The proportion of the workforce which is self-employed (14.2%) is higher than the Surrey or countrywide average.

Local Evidence

The Balancing Jobs and Homes Topic Paper (2016) found that in order to secure an ideal balance between housing delivery and economic growth, the Council should aspire to deliver 1.982 jobs for every home delivered. In essence the Plan and the Spatial Strategy strives to avoid the area becoming an increasingly dormitory place for people commuting to London and other centres, and seeks to limit the congestion that this brings to our road and rail network. Creating a better balance of homes and jobs requires expansion and diversification of employment in the District i.e. encouraging high-skilled and higher-paid jobs, but also through providing 'hot desking' office space. The latter would enable those who normally work in London to work remotely in a professional environment but able to avoid the daily commute.

The Council is keen to tackle the challenges to the local economy through the right investment, support and infrastructure and has adopted corporate objectives which support a thriving economy. With this in mind the Council adopted a local economic strategy and delivery plan in December 2017, known as the Economic Proposition. The Economic Proposition provides a framework for strengthening and growing the local economy to ensure the area can stay competitive and ensure our future prosperity. The Proposition underpins other local strategies, plans and policies covering such areas as spatial designations and allocations, commercial development and regeneration, interaction with skills providers, underpinning bids for funding to support business growth and job opportunities. The Economic Proposition has been relevant to the content of the policies of Our Local Plan, all of which seek to protect and enhance the economic offering of the District.

The aims of the Economic Proposition are to:

- I. Improve and increase employment space
- II. Invest in strategic infrastructure
- III. Regenerate town centres
- IV. Encourage high-value, high-skilled employment
- V. Provide support for our businesses to grow and prosper.

These aims will be delivered through an initial Delivery Plan to be agreed annually and monitored by Committee and also through the monitoring of the Local Plan.

The Economic Needs Assessment (2017), an update to the Economic Needs Assessment 2015, has looked at the employment needs of the District to 2033 in more detail, as well as the sectors that are anticipated to grow in the future. It determined that in order to meet baseline need for employment growth, 15.3ha of land for B-class employment use would need to be identified, the majority of which (8.6ha) should be for Office use (B1). As office use is a much less 'land-hungry' employment use and can be accommodated on one footprint, but over multiple storeys, over shops and even homes, the Council do not necessarily need to find an additional 15.3ha. In fact, evidence in the Economic Needs Assessment and HELAA suggests all of this growth can be met through the expansion, regeneration and intensification of existing employment sites. However, in line with both NPPF and sustainable principles, town centres will need to remain the focus for office development as far as is practicably possible.

The Government's Permitted Development Rights legislation, implemented in 2013, has led to the loss of much office space converted to residential use without planning permission. As such the Council will still need to monitor change and loss and be flexible in its approach to supporting employment space.

Tandridge's economy and recent trends

During the period from the late 1990s up until 2008 the District saw an average annual growth of 2.0% per annum. The 'Credit Crunch' in 2008 and subsequent economic recession had a notable impact on the number of jobs in Tandridge, as was the case nationally. As a result the District experienced a reduction in overall jobs numbers between the period 2008 and 2011 of 1.1% per annum.

Since 2011 economic performance has improved and Tandridge has seen a return to the trend of jobs growth and by 2014 jobs numbers topped the pre-recession peak. The District has continued to see strong jobs growth up to 2016, which is the base date of the forecast. During this period there was an average annual growth rate of 1.5% which is lower than the pre-recession period but still represents a strong level of growth. In 2016 the Experian forecast shows the District had a total of 39,800 jobs.

From 2016 the Experian forecast shows a slower rate of jobs growth plateauing in the short term (2016-2020) before seeing growth resuming from 2020 onwards, albeit at a slower rate than has been seen in recent years (2011-2016) or during the pre-recession period (pre-2008). Over this period the Experian forecast shows an average annual growth rate of 0.7%. This is half the growth rate of 1.4% per annum that was seen in the District from 1997-2016.

The Vibrant Economy Index (as of November 2016) ranks Tandridge 74th out of 324 local authorities (23rd percentile) overall. The District ranks highly for social metrics: 13th for Inclusion and Equality; 26th for Health, Wellbeing and Happiness; and 58th for Community, Trust and Belonging. Conversely, the District ranks slightly below average for prosperity (177th); Dynamism and Opportunity (171st); and Resilience and Sustainability (177th) – these metrics broadly relate to the District's economic prosperity.

The evidence base shows that the existing settlements in Tandridge do not have the necessary attributes to compete economically with nearby districts. However, it is important to remember that this lack of local scale does not mean that the Tandridge economic base is in decline, but instead the economic studies show long-term stability albeit with limited local growth prospects.

The District's economic attributes - its skills base, accessibility, and quality of life - mean it may be able to support economic growth in sectors in which it is currently under-represented. Moreover, there is the potential to develop sectors which provide higher productivity per head employment.

The Gatwick Diamond

Tandridge is located within the Gatwick Diamond economic growth area which offers considerable advantages as a business location. The Gatwick Diamond Initiative is a business-led private/public partnership that was established in April 2003 to improve the economic

performance of the area. The 'Gatwick Diamond' reflects a diamond shaped area, with Gatwick Airport at its heart, running between London and Brighton, and extending to Horsham in the west, and East Grinstead to the east. Tandridge District lies on the eastern edge of 'the Diamond' and actively engages with the initiative. The area now includes seven local borough/district councils (Horsham, Crawley, Mid Sussex, Tandridge, Reigate & Banstead, Mole Valley and Epsom & Ewell) and two county councils (West Sussex and Surrey), as well as a range of private sector partners.

The Gatwick Diamond is home to 45,000 businesses including many UK and European Headquarters. Some of these companies are Unilever, Exxon Mobil, Toyota, Doosan, Thales Group, Varian Medical Systems, Eleka, Nestle, EDF Energy, Edwards Vacuum, Canon Inc. and G4S. It also contains the Manor Royal Business Park – the largest business park in the UK, housing 550 businesses and employing around 35,000 people, thus creating employment opportunities for Tandridge.

Tandridge's position in the Gatwick Diamond presents a real opportunity to support economic and business operations and will be valuable in supporting the prosperity of the area. Tandridge District Council funds and actively engages with the initiative. It is notable that existing employment areas in the District already predominantly cluster towards the South-West and closer proximity to the airport (see Map 4 in section 5.12)

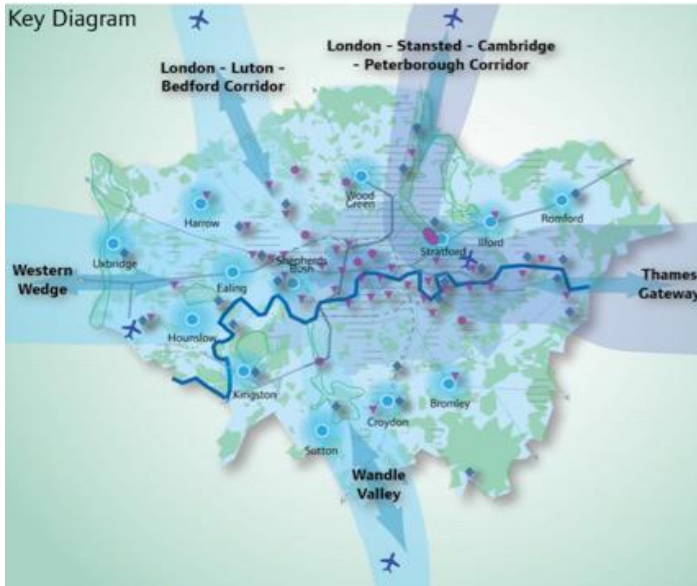
Map 1: The Gatwick Diamond:



Wandle Valley Corridor

The Wandle River is one of the main tributaries of the River Thames. It is recognised within the Mayor's Greater London Plan (GLP) as being of strategic importance and it forms part of the "Blue Ribbon Network". The Wandle Valley is highlighted as an area with brownfield development opportunities, pockets of deprivation, a need for revitalisation of the Croydon office market, and needing to build on potential links with Gatwick. There are moves to improve transport infrastructure within the area including Thameslink 2010 project to upgrade and extend the existing Thameslink network.

It is seen in the GLP as a mechanism for co-ordinating planning and investment in a corridor of city region importance which connects London with the wider city region. The GLP recognises the strategic significance of the Wandle Valley as an employment area as well as its synergy with Gatwick Airport. The London Plan recognises the Wandle Valley as an opportunity area, a development corridor with potential for intensification of housing, town centres and business growth.



Map 2: Area coverage through the Wandle Valley corridor

Coast to Capital

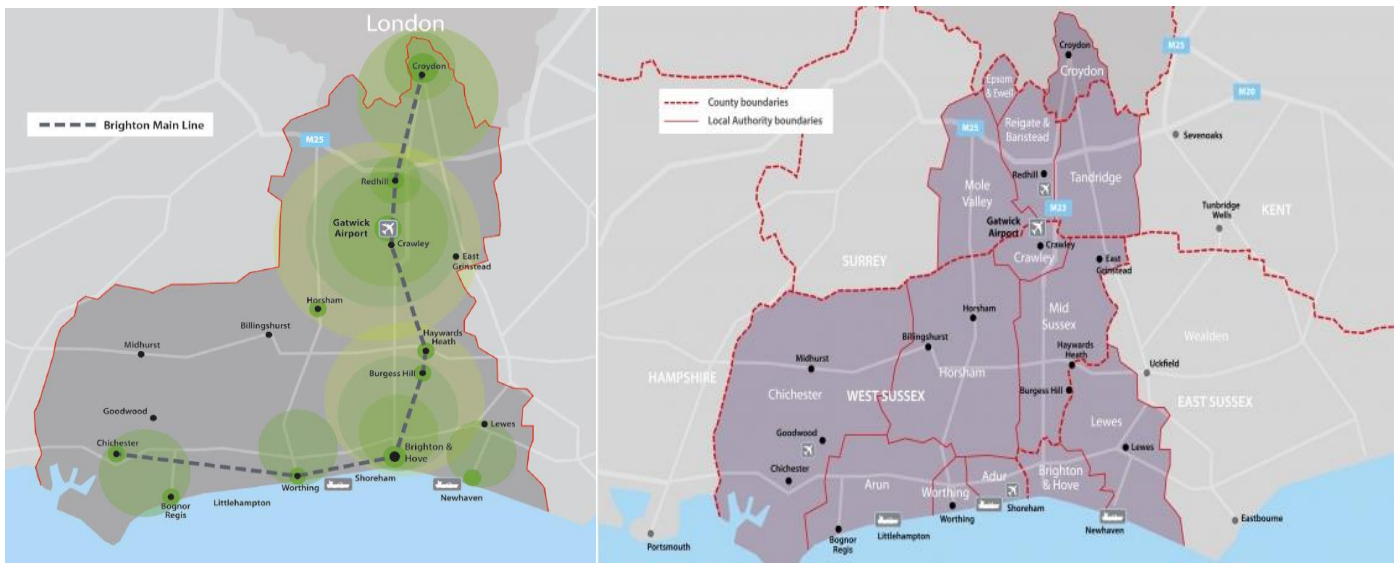
Coast to Capital Local Enterprise Partnership (LEP) is one of the 38 LEPs established by Government in 2011. They are a business-led partnership with the public and education sectors, focusing on growing the regional economy.

The Coast to Capital area covers a diverse and vibrant geography (London Borough of Croydon, East Surrey, Gatwick Diamond, Brighton & Hove, Lewes and West Sussex) which is reflected in the business community. The M23 corridor is a key strength for the area, running from the creative and digital hub of Brighton on the coast, to Crawley and the multi-national headquarters located around Gatwick Airport in the heart of the region, and on to the strong service sector base in Croydon and its links into London.

The Coast to Capital region has the 7th biggest economy in England - £50bn in size in 2016. There are currently some of the highest employment rates and lowest unemployment rates ever seen in the region. Their vision is for the Coast to Capital area to be amongst the most productive and successful regions of the United Kingdom by 2030, for the regional economy to be known for its many strengths and its potential to support the UK's economic growth.

The Coast to Capital Growth Hub supports businesses in the area to achieve their growth ambitions through the provision of direct support and signposting services, completely free at point of use. Since its launch the Coast to Capital Growth Hub has supported thousands of businesses.

The business base is strong, at 87,000 and growing; the rate of new start-ups is currently at its highest level in over a decade. The majority of businesses are Small and Medium-sized Enterprises (SMEs) which are spread across the region and across wide ranging industries.



Map 3: The county and local authority boundaries of the Coast to Capital

Their current (SEP) Strategic Economic Plan was developed with the full engagement of business and the public and private sectors and was published in July 2014. It sets out their ambitions for sustainable economic growth with stretching outcome targets of 60,000 jobs, 26,000 additional homes and 970,000 sq.m of employment space by 2021.

Retail and Centres

The largest centres in the District are Caterham and Oxted, although there are also a number of smaller centres. Tandridge District is bounded by larger town centres located in neighbouring local authority areas, such as Croydon, Crawley and Redhill. Such centres offer wider retail and leisure choices which compete with and draw custom from the smaller centres within Tandridge. Tandridge's town and local centres also face threats from online shopping and future behaviour changes which are likely to impact their vitality and viability.

Tourism

There is a variety of successful tourism assets within the District that act as a draw to visitors to our area and support our economy. These include Lingfield Race Course, Godstone and Priory Farms and the British Wildlife Centre. The challenge for the plan will be to ensure tourism assets thrive and benefit the economy without negatively impacting upon the rural environments in which they sit.

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

National Context

The Government's National Planning Policy Framework (NPPF) expects local planning authorities to promote energy from renewable and low carbon sources. The Planning Practice Guidance (PPG) contains extensive guidance regarding considerations for renewable technologies.

The Climate Change Act 2008 has established legally binding targets for greenhouse gas emissions. It requires UK carbon dioxide emissions to be reduced by at least 34 per cent by 2020 and at least 80 per cent by 2050, relative to 1990 levels. This legislation requires the Government to assess the risks of climate change, implement a national adaptation programme, establish further carbon trading schemes and follow five yearly national carbon budgets.

Government guidance notes that the UK has legal commitments to cut greenhouse gases and meet increased energy demand from renewable sources, but whilst local authorities should design their policies to maximise renewable and low carbon energy development, there is no quota which the Local Plan has to deliver.

Local Context

Figure 08.1 in Appendix 1 indicates that the majority of Surrey's emissions are as a result of transport (37%) and heat and electricity used in homes (35%), both of which are higher than surrounding counties (Berkshire, Hampshire, Sussex and Kent). Like with the ecological footprint, there is significant variation in carbon emissions across Surrey's districts and boroughs. However, the main driver causing fluctuations in carbon emissions is transport. This comparison shows the importance of reducing emissions as a result of transport through better public transport links, sustainable transport planning and infrastructure to enable flexible working (e.g. broadband access). The high domestic emissions reflect the residential nature of the county, the poor energy efficiency of housing and modern energy-intensive lifestyles. The housing stock of Surrey may have a comparatively younger overall age profile than other counties due to higher levels of recent development; however a significant proportion of the housing stock was built prior to the adoption of sustainability standards and recent Building Regulations requirements for energy performance. Figure 08.3 does however show that CO₂ emissions have been falling in Tandridge, based on most recent data. Map A.5 in Appendix 1 indicates that CO₂ emissions are strongly linked to population distribution and density, although airfields are also a factor.

Another interesting measure is 'Ecological footprint'. Ecological foot printing estimates how much of the planet's biologically productive land and sea an individual, population or activity requires to produce all the resources it consumes and to absorb the waste it generates. The footprint is built on the premise that humanity lives on a planet with a limited biologically

productive surface. Given that life competes for such space, Ecological Footprint accounts track how much people demand from those surfaces and compare this to how much they can generate. By carrying out a county wide ecological footprint it is possible to calculate the impact of each of Surrey’s inhabitants. By doing this and multiplying it by the global population we can calculate how many planets we would require to sustain our lifestyles if everyone in the world lived like Surrey’s citizens. By using input-output data modelling, covering global trade flows and tailored based on the capital expenditure of Surrey’s residents, it is possible to calculate the approximate ecological footprint of Surrey. This footprint can be split down into the main areas of resource use (food, transport, housing, consumer goods, government, private services and capital investment). Unlike using a carbon footprint the ecological footprint in Figure 08.4 of Appendix 1 highlights areas of consumption that have the greatest environmental impact, beyond just greenhouse gas emissions. Whilst capital investment and private services have little impact, food, transport and housing account for 70% of the total footprint. Much of this can be attributed to the rural nature of the county (with associated high levels of car ownership) with large residential properties and high levels of meat consumption. Figure 08.5 shows that Tandridge has the 5th highest ecological footprint in the county.

In Local Plan consultation, respondents have requested that energy efficient technologies be utilised. The Caterham Neighbourhood CR3 Forum is aspiring to be as self-sufficient as possible regarding energy, citing anaerobic digestion biogas as a source for Combined Heat and Power (CHP) as a local potential, particularly if combined with Solar Arrays.

The challenge for the Council will be ensuring the Local Plan sets about positively addressing measures and embracing opportunities to further reduce emissions and move to a low carbon economy.

Tandridge already participates in the Surrey Energy and Sustainability Partnership (SESP), a collaborative group involving the County Council, all 11 borough and district councils, Surrey Police and Action Surrey. All 12 councils have plans in place to improve efficiency and there is ongoing sharing of opportunities and lessons learnt

Potential Technologies

Wind

Wind energy needs to be mindful of potential impacts and constraints such as protected areas, public rights of way, and residential areas. Gatwick Airport Ltd oversees a ‘wind turbine safeguarding map’ which covers an area out to 30km from the airport, within which they ask to see all applications involving wind turbines. Wind turbines are a potential concern for the airport as they have the ability to impact on primary radar by causing ‘clutter’ and false aircraft tracks on the radar operator’s screen. Secondary radar can also be disrupted by wind turbines as they can cause misplaced aircraft returns on the operators screens.

Visual landscape impact is often a concern where wind turbine proposals are concerned. Great care should be taken to ensure landscape and heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. Negative impacts can also have a detrimental impact on tourism. Local topography is an important factor in assessing whether wind turbines could have a damaging effect on landscape. Impacts can be felt equally in flat and hilly areas. Cumulative impacts need to be considered, especially the increasing impact that wind turbines can have on landscape and local amenity as the number of turbines in an area increases. The PPG contains guidance on how to assess cumulative impact. Baseline information supporting Objective 8 in Appendix 1 indicates that in terms of wind speeds, northern areas of the District have the greatest potential, followed to a lesser extent by the far south and the west (Map A.6). The northern areas reflect the higher land of the Surrey Hills AONB where landscape is clearly a significant constraint. Population density is also highest in the north, highlighting the difficulties of locating wind turbines onshore.

Biomass

Depending on the fuel used, this can be a County Planning matter falling under the Waste Authority. This is the case if the fuel consists of food waste or construction wood waste. However, wood fuel resulting from woodland management falls under the domain of the District planning authority.

The most common fuel is wood pellets which in reality may be sourced from suppliers some distance away. However, there is, at least in theory, a potential from local wood sources; map A.9 in Appendix 1 indicates local woodland cover. A small scale Biomass CHP plant powered from local wood would bring significant benefits encouraging woodland management as well as in generating energy from a renewable resource.

A quarter of the country's woodland is in South East England. Mobilising just half its sustainable yield (0.5 million tonnes per year) to replace fossil fuels could generate 5% of the region's renewable energy, saving 700,000 tonnes of CO₂/year - equivalent to removing 29,000 cars from our roads. Only about 10% of potentially available wood fuel supply in the region (16% in Surrey) is being used at present, supporting just 24 wood fuel businesses (source; Forestry Commission).

Parks waste and commercial green waste are also potential fuels that are not currently fully utilised and may also contribute to biomass fuel supply.

Combined heat and power (CHP) plants can operate on a wide variety of biomass fuels. The Biomass Energy Centre contains useful information regarding CHP, which is the simultaneous generation of electricity and heat. Tri-generation is a further extension to include a refrigeration process for air conditioning as well. It highlights that CHP is most suitable when there is year round demand for heat to balance the demand for electricity, but is useful in a number of situations, several of which are potentially applicable (at small scale) in rural areas:

- When there is a requirement for space heating or process heat close to the generator

- To provide low temperature (up to 90°C) hot water heating for local district schemes
- For applications that require (low grade) process heat, especially those that can supply their own fuel (i.e. sawmills and wood process industry which use heat for timber drying and steaming)
- At sites such as hospitals, leisure centres, greenhouses, and retirement complexes which have a year-round, and ideally 24 hour, heat demand
- To provide steam for other industrial applications
- Where there is a requirement for environmentally responsible disposal of waste (i.e. sewage sludge, clinical waste or agricultural residue) and where transport costs for disposal are high
- To power an absorption refrigerator to provide cooling in summer, giving tri-generation.

The potential impacts of biomass may typically relate to: visual (flue), noise, and air quality. The now expired South East Plan nonetheless had a useful policy (NRM16). It cited the following as factors in the consideration of biomass plants 'The proximity of biomass combustion plants to the fuel source and the adequacy of local transport networks; and availability of connection to the electricity distribution network.'

Solar

Solar energy generation is less contentious than wind and has the potential to provide numerous skilled jobs in Surrey. It is worth noting that there is already a lot of economic activity in this area with over 300 mega watts of solar photovoltaic (PV) installed in South East England in year 4 of the Feed in Tariff (2013/14). Assuming that these installations are working at 10% of their total peak generation capacity, over 292,984 MW of electricity is being produced by PV in the South East each year; enough to provide electricity to over 60,000 homes. Surrey, due to its location in the South of England has the potential to produce a substantial proportion of its energy requirements from solar PV.

Solar panels can be mounted on buildings or free-standing solar farms. Active solar technology, (photovoltaic and solar water heating) on or related to a particular building is often permitted development provided the installation is not of an unusual design, or does not involve a listed building or ancient monument or is within a designated area. The costs for solar PV are continuing to reduce, although reductions in Feed in-Tariffs have made developments less attractive. Generally, roof space is the preferred location for large scale solar arrays and may not require planning permission. New development will provide further opportunities for solar power - as well benefit from passive solar gain through their orientation - with a north/south axis being most advantageous. Potential for solar arrays is consistent across all Tandridge and Surrey (see Map A.7 in Appendix 1)

Solar installations need to be carefully assessed in respect of Gatwick Airport. Depending on their location and the size, have the potential to deflect radar and can cause glint and glare. In some circumstances Gatwick Airport Ltd may request that a developer submits a solar hazard glint and glare assessment with their proposals.

Ground Source Heating and Cooling Schemes

Ground source heating and cooling (GSHC) schemes use the solar energy stored in the ground, and in groundwater, to heat and cool buildings. They are generally permitted development for planning purposes, although need to satisfy building regulations.

There are two principal types of ground source heating and cooling (GSHC) schemes:

1. open-loop schemes, which rely on groundwater in an aquifer (an underground water source)
2. closed-loop schemes, where a closed piping system is buried in the ground.

Since they abstract and discharge water, the Environment Agency (EA) regulates open-loop ground source heating and cooling schemes.

Particular care should be taken in the vicinity of sensitive locations, including:

- groundwater source protection zones, rivers, wetlands
- contaminated land
- cesspits or septic tanks
- the hydrological catchment areas of internationally protected areas, particularly wetlands

In partnership with the British Geological Survey, the EA have developed a screening tool to show whether an area may be suitable for an open loop ground source pump. Potential for ground source open-loop pumps is most favourable in the north and south of the District and less favourable in the centre (see Map A.8 in Appendix 1).

Network Capacity

Network capacity is also an important factor in consideration of renewable energy schemes. There is a methodology available from the Department of Energy and Climate Change's website on assessing the network capacity for renewable energy development. In addition, UK Power Networks have maps on their website showing network capacity in individual areas.

Community Benefits and Initiatives

The PPG highlights that community initiatives, including alongside Neighbourhood Planning, should be encouraged as a way of providing positive local benefit from renewable energy development. Further information for communities interested in developing their own initiatives is provided by the Department of Energy and Climate Change.

Positive weight may be given to renewable and low carbon energy initiatives which have clear evidence of local community involvement and leadership. For example this may include links with a community energy group or to a community energy project to ensure maximum community benefit.

Pattern of Residential and Commercial Development and its Implications

Reducing the District's carbon footprint is about more than the introduction of new technologies. As baseline information in Appendix 1 (Objective 8 statistics) indicates, transport is the biggest source of emissions.

Paragraph 95 of the NPPF states 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'*.

Royal Town Planning Institute (RTPI) research shows dispersed settlements typically result in higher levels of greenhouse gas emissions and resource consumption than compact settlements. This is attributable to increased car dependency and energy consumption associated with low-density housing, coupled with the increased embodied energy during infrastructure provision.

Therefore, the Local Plan will have a key role and challenge in ensuring the pattern of new development reduces the need to travel and maximises the scope for sustainable transport.

SA objective 9: To use natural resources prudently

Surrey County Council (SCC) is the statutory waste and minerals authority and the adopted Waste Local Plan (2008) and Minerals Core Strategy (2011) are currently used to determine planning applications in relation to waste and minerals matters. Each of these plans is a statutory Development Plan and should be read alongside the Local Plan.

SCC is currently in the process of updating its Waste Plan and the new Surrey Waste Local Plan will cover the period 2018-2033. Tandridge District Council is required to make planning decisions and prepare policies that accord with the Waste Local Plan as far as is practicably possible, as it forms part of the overall development plan.

In terms of sustainability, waste minimisation is an important consideration. The national waste hierarchy (2011) indicates an order of preference for action to sequentially reduce and manage waste: prevent waste, re-use waste, recycle waste, use waste for energy recovery and finally and least desired, dispose of waste.

The Surrey Waste Partnership (SWP) sets out a plan for managing Surrey's waste for the next ten years, up until 2024/25 through its Joint Municipal Waste Strategy. The SWP is made up of Surrey County Council and the 11 district and borough councils in Surrey. It aims to manage Surrey's waste in the most efficient, effective, economical and sustainable manner. Surrey is already a high-performing county when it comes to recycling and waste management, but can and must continue to improve in order to succeed against the challenges of resource efficiency and increasing budget pressures on waste collection services.

Household waste recycling can be found within the District at Caterham and Warlingham; and just outside the District at Redhill, Crawley and East Grinstead.

Minerals make a significant contribution to our quality of life. It is important that there is an adequate supply of aggregate minerals for building and repairing houses, roads, schools, and hospitals. Non-aggregate minerals serve industrial applications such as glass, paint and ceramics manufacture. Surrey uses considerable amounts of minerals in order to sustain its economy, most of which are imported as finished products. Energy minerals play a crucial role in the national economy. The Minerals Core Strategy seeks to reconcile the need for minerals while being prudent in the use of natural resources and addressing other mineral development issues. A sustainable solution also requires the reconciliation of economic demands with the social and environmental implications of mineral extraction.

Within Tandridge District there are significant Minerals Safeguarding Areas around Godstone and between Oxted and Redhill just south of the M25; as well as east of Limpsfield. Quarrying still continues in the areas around Bletchingley, Oxted and Chelsham. Worked out sites have been used for landfill or as reservoirs.

Surrey's wooded landscape provides potential for a step change in the local green economy. Over 20% of Surrey's land area is covered in woodland (37,564 hectares) and the majority of these woodlands (98%) are over two hectares in size and therefore suitable for timber extraction when managed sustainably. Within the county, broadleaf woodland is the dominant forest type, representing 53.1% of all woodlands (conifer represents 15.1%, mixed represents 22.1% and open space in woodlands represents 6%). Surrey's woodland is very unique as 96% of it is under private and community ownership and is not managed by the Forestry Commission. However, this also presents a problem as many of these privately owned woodlands may be undermanaged. Therefore they may not be in a condition to support biodiversity and the ecosystem services associated with woodlands in active management. By bringing these woodlands back into active management there is the potential to increase the production of roundwood timber and maximise their impact on the local economy.

Description of the Geology and Hydrogeology:

Most of the rocks in the area are from the Cretaceous Period, but there are some Eocene (Tertiary) outliers and younger drift deposits in the northern part of the area, capping the chalk. There are also some geologically recent alluvial deposits in the southern part of the District.

The rocks form part of the northern limb of the denuded Wealden Anticline and consequently the regional dip of the strata is to the north.

The Chalk Formation occupies most of the northern area of the District. The dip slope consists of the upper part of White Chalk with an extensive capping of Clay with Flints. Isolated outliers of Blackheath Pebble Beds (part of the Harwich Formation) also occur as a capping on the chalk around Caterham and Warlingham and were quarried for gravel in the Chelsham area.

The Grey Chalk and the lower part of the White Chalk form a distinctive scarp slope running east–west across the District to the north of the M25 Motorway. The chalk has been extensively quarried at the former lime works to the north of Oxted.

There are no permanent streams on the chalk in the TDC area. The Caterham Bourne occasionally surfaces in the Halliloo Valley after long periods of rainfall and flows northwards, following a route parallel to the A22.

The Upper Greensand outcrops at the base of the chalk escarpment but is often masked by a downwash of Coombe Deposits. It is listed as a minor aquifer and is in hydraulic continuity with the chalk. The Upper Greensand is honeycombed with an extensive network of underground galleries; a legacy of a long history of extraction of Reigate Stone. These galleries have the potential to act as pathways for pollution.

The next outcrop to the south consists of the Gault Clay. This clay horizon produces the low lying strike vale used for the route of the M25 Motorway where it crosses the District. A spring-line occurs along the line of the Gault and some streams develop from the area, including the headwaters of the River Eden. The hydro-geological importance of the Gault lies in its low permeability. It protects the underlying Lower Greensand aquifers from infiltration by potentially polluting surface waters.

The Lower Greensand is subdivided into the Folkestone Formation, Sandgate Formation, Hythe Formation and Atherfield Clay. Both the Folkestone and Hythe Formations function as aquifers. The Sandgate Formation in some areas can act as a barrier, separating and isolating the groundwater in the two permeable formations above and below. The Folkestone Formation is still extensively worked for the extraction of sand along the line of strike from Nutfield through Bletchingley and Godstone to Westerham. Disused quarries at Nutfield and Godstone have been used as reservoirs and the quarry at Nutfield continues in use for recreational activities.

Worked-out quarries at Bletchingley and Oxted have been used for landfill.

The underlying Sandgate Formation has a long history of quarrying for Fullers' Earth in the area around Nutfield. The extraction activities ceased in recent times and the quarries are now used for landfill.

The Hythe Formation consists of hard, well-cemented sandstones and limestones. It was quarried for use as roadstone in the area around Limpsfield. These rocks are responsible for the formation of Nutfield Ridge, Tilburstow Hill and Limpsfield Chart.

The Atherfield Clay forms a very narrow and generally poorly exposed outcrop at the base of the Hythe Formation. It has low permeability and its location is often only evident by the presence of a spring-line.

The Weald Clay forms an extensive tract of low-lying terrain to the south of the greensand ridge and is only interrupted by the occasional subordinate outcrop of sandstone and shelly-limestone. The clay has been extracted and used for brickmaking in South Godstone, Crowhurst, South Nutfield, Outwood, Smallfield and Lingfield. Most of the streams and rivers

in the TDC area are situated on the Weald Clay or over a substantial clay seam that occurs mid-way through the Folkestone Beds.

The south-eastern area of the District (Lingfield, south to Felbridge) is situated on the Tunbridge Wells Sandstone Formation. This Formation is subdivided into the Upper and Lower Tunbridge Wells Sandstones separated by the Grinstead Clay. The Tunbridge Wells Sandstone has been extracted in the area around Dormansland for use as a building stone and the Grinstead Clay has been extracted for use in brickmaking.

A small outcrop of Wadhurst Clay occurs in the extreme south-eastern corner of the District.

There is an oil producing well at Godstone extracting oil from the Corallian strata of the Jurassic. Other, exploratory wells have been drilled at South Godstone and Bletchingley.

SA objective 10: To adapt to the changing climate

Climate change is a global concern and with impacts which are also global in scope. Nationally, Government predictions indicate an increase in temperature, and an increase in the incidence of flooding and subsidence. Estimates of likely effects at regional and sub-regional level can be seen at Appendix 1, objective 10.

The effects of climate change will increase the likelihood and severity of flood events in Tandridge and the wider area, so the effects of objective 10 overlap to a large extent with effect related to flood risk (SA objective 11). Due to the rural nature of the District, some communities are at risk of isolation in extreme events and both Caterham and Smallfield have experienced this already.

Other effects can be related to increased temperatures, for which greenspace can mitigate – particularly greenspace within urban areas which can help reduce the 'heat island' effect (an area which is significantly warmer than its surrounding green / rural areas due to human activities and hard surfacing).

The potential effects in the District of climate change over the next few decades include:

- Biodiversity: changing conditions may favour some species but harm others;
- Housing and Buildings: potentially less heating demand but increased cooling requirements;
- Land Use: problems caused by flooding, erosion and drought, with changing patterns of crop suitability and land use;
- Transport: disruption to road and rail services from flooding and temperature changes;
- Health: potential increase in heat-related deaths, but a possible decrease in excess winter deaths related to cold. Sources of disease such as bacteria and pests may thrive in warmer conditions and lead to new or exacerbated health problems.

SA objective 11: To reduce flood risk

The threat from flood risk is linked closely to the previous topic of climate change, which will exacerbate flood risk in the future. The District includes areas of flooding with Flood Zones 3a and 3b. Many brooks, streams and rivers that flow through our District have an identified flood risk and incidents of flooding have been witnessed across the District, particularly in Caterham and Smallfield.

Types of Flood Risk in the District

There are a number of different sources of flooding in the District including river (Fluvial) flooding; groundwater flooding and surface water flooding (Pluvial). There have also been a number of sewer flooding incidents.

Fluvial Flood Risk

Fluvial flood risk is shown to generally be confined to the Main River floodplains such as the River Mole and its tributaries and the Eden Brook (see Map A.11 in Appendix 1). Overall fluvial flood risk is in close proximity to watercourses, with a few areas of more extensive floodplain associated with the Burstow Stream.

Surface water flooding

Flooding from surface water runoff (or 'pluvial' flooding) is usually caused by intense rainfall that may only last a few hours. Flooding usually occurs when rainfall fails to infiltrate to the ground or enter the drainage system. Ponding generally occurs at low points in the topography. The likelihood of flooding is dependent on not only the rate of runoff but also saturation of the receiving soils, the groundwater levels and the condition of the surface water drainage system (i.e. surface water sewers, highway authority drains and gullies, open channels, Ordinary Watercourses and SuDS).

Surface water flooding problems are inextricably linked to issues of poor drainage, or drainage blockage by debris, and sewer flooding.

The Risk of Flooding from Surface Water (RoFSW) predominantly follows topographical flow paths of existing watercourses or dry valleys and therefore may cross local authority boundaries in places with some isolated ponding located in low lying areas. The extent of surface water flooding in the District can be seen in Map A.12 in Appendix 1.

In February 2014, a major incident was declared due to severe surface water flooding in the Caterham Bourne catchment (Caterham, Whyteleafe and Woldingham). The flooding caused major property damage with 100 properties and 13 businesses affected in Tandridge, and significant disruption to infrastructure including the closure of the A22 for four weeks. In June 2016, surface water flooding was experienced in the north of Tandridge District, particularly in Caterham and Chaldon, where one and a half times the mean June rainfall fell in a 2-hour

period. 86 internal property floods and 63 external property floods were reported, with many of the internal floods involving sewage. Seven road closures had to be carried out by the police and one by Surrey CC Highways.

Caterham and Warlingham are ranked as the third highest surface water risk area in the county.

Climate change is predicted to increase rainfall intensity in the future by up to 40% under the new range of allowances published by the Environment Agency. This will increase the likelihood and frequency of surface water flooding, particularly in impermeable urban areas, and areas that are already susceptible.

Groundwater flooding

Areas with increased risk of groundwater flooding include Caterham, Whyteleafe and Woldingham, east of Lingfield and Oxted. This strongly links to the geology in these areas, with the alluvial deposits (clay, silt, sand and gravel) being a contributing factor.

The effect of climate change on groundwater flooding problems, and those watercourses where groundwater has a large influence on winter flood flows, is more uncertain. The updated climate change guidance released in February 2016 does not provide information on expected changes to groundwater flooding under future climate change. However, milder wetter winters may increase the frequency of groundwater flooding incidents in areas that are already susceptible, but warmer drier summers could counteract this effect by drawing down groundwater levels to a greater extent during the summer months.

Flood defences:

Following the flooding in Woldingham and Whyteleafe in 2014, Surrey Highways has completed various permanent flood relief solutions. These include two flood storage areas (approximately 15,000-20,000m³ capacity) to control the amount and rate of water entering the drainage system when the Caterham Bourne levels are high. A third storage area is currently in the planning stage. This scheme provides a cross-boundary benefit to both Tandridge and the London Borough of Croydon.

Figure O11.1 in Appendix 1 shows potential flood alleviation schemes (FAS) in the area.

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

Introduction

There is a high demand for water across the South East of England, creating pressure on water supplies and the natural environment.

New homes require the provision of clean water, safe disposal of wastewater and protection from flooding. The allocation of large numbers of new homes in certain locations may result in the capacity of existing available infrastructure being exceeded, a situation that could potentially cause service failures to water and wastewater customers, adverse impacts to the environment, or high costs for the upgrade of water and wastewater assets being passed on to the bill payers.

In addition to increased housing demand, future climate change presents further challenges to pressures on the existing water infrastructure network, including increased intensive rainfall events and a higher frequency of drought events. Sustainable planning for water must now take this into account.

River Catchments and Watercourses

Within Tandridge there are four main river catchments and all of these originate within Tandridge. Two of them (Redhill Brook and Burstow Stream) are both part of the Upper River Mole catchment.

Upper River Mole (Redhill Brook and Burstow Stream)

The western part of Tandridge lies within the Upper Mole catchment with the Burstow Stream, Redhill Brook, and associated tributaries flowing generally in the westerly and northerly direction towards the River Mole. The Redhill Brook – discharges into Salfords Stream and then the River Mole.

River Eden and tributaries

The River Eden connects to the River Medway. It lies in the eastern part of Tandridge and has a relatively wide flood plain due to the low lying and flat topography of that area. The main areas of flood risk in Tandridge are on the Upper Eden where it passes through Limpsfield and Oxted, Gibbs Brook through Godstone, Ray Brook through Blindley Heath, and Eden Brook, in Lingfield.

Caterham Bourne

The Caterham Bourne is an ephemeral chalk stream recorded as flowing about 1 year in 7, but has been the source of significant flood events. The watercourse originates to the north of

the M25 and flows north from Caterham before flowing north into Purley and Croydon where it connects to the Wandle

The river is heavily culverted with only an estimated 20% of its length remaining as open channel. Significant flooding has been recorded along the length of the Bourne which is a complex mix of fluvial flooding exacerbated by culverts, surface water and groundwater.

Water Quality

The watercourses within Tandridge have at best “moderate” ecological status under the Water Framework Directive, and two have a “Bad” status (Burstow Stream and Eden Brook). The status of Tandridge watercourses can be seen at Map A.14 in the Appendix.

Waste Water Treatment Works (WwTW)

Background evidence in the form of the Water Cycle Study identifies nine WwTW are likely to be serving growth within Tandridge (see Map A.14 in Appendix 1). The wastewater provision for the potential Garden Settlement sites requires further consideration to ensure capacity is available, at an appropriate time. It is possible that a new treatment works may be required to serve these sites.

Groundwater Pollution and Groundwater Source Protection Zones

Several aquifers are present in the area, particularly in northern parts of the District. The major aquifer bearing rocks are the Chalk and the Lower Greensand. Minor aquifers occur in the Upper Greensand and the Tunbridge Wells Sandstone.

Demands for water and the pressure this creates on available resources are particularly intense in the South East of England. Groundwater is susceptible to pollution from point sources (e.g. leachate from landfill sites, effluent from industrial sites, etc.) and diffuse sources (e.g. runoff from agricultural land that has been treated with chemical fertilisers, etc.), and is difficult to clean because of its slow recharge and circulation rates. Water that enters an aquifer remains there for an average of 1,400 years, compared to only 16 days for rivers. In some parts of the District, there is incomplete connection to the mains sewerage.

The Environment Agency has a Groundwater Protection Policy to help prevent groundwater pollution. In conjunction with this the Environment Agency has defined groundwater Source Protection Zones (SPZs) to help identify high risk areas and implement pollution prevention measures. The SPZs show the risk of contamination from activities that may cause pollution in the area, the closer the activity, the greater the risk. There are three main zones (inner, outer and total catchment) and a fourth zone of special interest which is occasionally applied.

Zone 1 (Inner protection zone)

This zone is designed to protect against the transmission of toxic chemicals and water-borne disease. It indicates the area in which pollution can travel to the borehole within 50 days from any point within the zone and applies at and below the water table. There is also a minimum 50 metre protection radius around the borehole.

Zone 2 (Outer protection zone)

This zone indicates the area in which pollution takes up to 400 days to travel to the borehole, or 25% of the total catchment area, whichever area is the largest. This is the minimum length of time the Environment Agency think pollutants need to become diluted or reduce in strength by the time they reach the borehole.

Zone 3 (Total catchment)

This is the total area needed to support removal of water from the borehole, and to support any discharge from the borehole.

Zone of special interest

This is defined on occasions, usually where local conditions mean that industrial sites and other polluters could affect the groundwater source even though they are outside the normal catchment.

A Map of these zones as they apply in Tandridge can be seen in Appendix 1, Objective 12, Map A.16.

The Environment Agency's approach to groundwater protection⁴ sets out a series of position statements that detail how the Environment Agency delivers government policy on groundwater and protects the resources from contamination. The position statements that are relevant to this study with regard to discharges to groundwater, include surface water drainage and the use of SuDS, discharges from contaminated surfaces (e.g. lorry parks) and from treated sewage effluent.

Protection of vital water resources can also assist in the maintenance of often fragile ecosystems, susceptible to the varying flows and availability of water. Increasingly, frequent extreme weather events result in heavy, prolonged rainfall and long dry spells impacting on river levels and flows. These events can create pressure on underground drainage systems and affect the level of rainfall available to recharge groundwater supplies. In line with the objectives of the Water Framework Directive (WFD) and the actions contained in the Thames River Basin Management Plan, the Council will need to work with applicants in seeking to improve the local water environment for people and wildlife, and promote the sustainable, prudent use of water. This includes seeking to ensure that development proposals avoid damage to the groundwater Source Protection Zones and result in water bodies maintaining or achieving a 'good' ecological status.

Water should be retained in the natural environment as far as possible. Proposals which seek to restore natural flows in the river systems or re-establish areas of functional floodplain will be supported, particularly where they would provide opportunities for recreation, habitat restoration/enhancement or additional Green Infrastructure provision.

Development adjacent to or likely to affect underground or surface water bodies covered by the Water Framework Directive and Thames River Basin Management Plan should, where possible, make improvements to the quality, ecology and hydro morphology of these water

⁴ The Environment Agency's approach to groundwater protection, Environment Agency (2017). Accessed online at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/598778/LIT_7660.pdf on: 09/03/2018

bodies. Additionally, such proposals should contribute towards the maintenance or achievement of 'Good Ecological Status' for the affected water bodies. This may take the form of on-site measures or a financial contribution to off-site measures.

A large proportion of the catchments are rural in nature so agricultural pollution and small private sewage treatment works affect the water quality. The Environment Agency commented in consultation that historic contamination (Brownfield sites) may affect water quality (and human health) and that the area has a number of old landfills, some of which may pose a risk to groundwater.

Tandridge, water companies and water consumption:

Water supply in the District is provided by SES Water for the majority of properties, however, there are a small number in the very south of the District that are supplied by South East Water and a number of properties in Tatsfield are supplied by Thames Water. In the Sutton and East Surrey area, some 85% of their water supply comes from groundwater sources, including large abstractions for public water supply at Kenley Water Works located just outside the District in Croydon. It should be noted that the Environment Agency has looked at current and future water usage and the climate change scenarios, and identified Sutton and East Surrey as being at a 'serious' stress level.

Furthermore, Thames Water has identified potential capacity issues with the main foul sewer serving the Caterham area, although have not identified this as a total constraint on development, proposals may therefore be required to contribute to capacity improvements.

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

Agricultural Land Quality and Uses

The principal land uses in the District are for farmland, mineral extraction and housing. Approximately 60% of the land is used for an agricultural purpose and the majority of this is Grade 3, with less substantial areas of Grade 4 and a small pocket of land in Tatsfield that has a higher grade. Map A.17 depicting agricultural land quality in the District can be seen in Appendix 1. In the northern part of the District where soils have developed on drift deposits overlying well-drained chalk, the farming tends to be arable. In the more southerly parts of the District where soils have developed over clay strata the agricultural use was mainly for pasture, but with improvements in drainage large areas are being farmed for arable.

Industrial History and Known Information on Contamination.

The area has not been extensively used by the manufacturing industry and consequently does not have any large areas of land that are liable to be designated as contaminated land. Several coal-gas producing works were operational in the District and many continued in use as holder stations after closure of the coking plants. One site continues in use as a transmission station for natural gas. Areas of land adjacent to railway sidings were frequently used as coal yards. Railway links were often extended to brick works and in several cases these areas have now been redeveloped as industrial estates.

The District has a long history of exploitation by the extractive industries. Many of the quarries have been used as landfill sites. Before the introduction of waste management controls, sites of worked out pits and quarries are likely to have been used for unregulated and poorly monitored waste disposal activities.

Past quarrying and mining operations have extracted the following materials:

- Building Stone; mainly from the Upper Greensand (Reigate Stone).
- Fullers' Earth from the Sandgate Formation (Lower Greensand).
- Building Sand from the Folkestone Formation (Lower Greensand).
- Roadstone from the Hythe Formation (Lower Greensand).
- Clay for brick-making, mainly from the Weald Clay but with smaller works situated over the upper levels of the Tunbridge Wells Sandstone.
- Agricultural Lime from the Chalk.
- Gravel from the Blackheath Beds (Harwich Formation).

Working quarries are currently extracting building sand from the Folkestone Formation and agricultural limestone from the Chalk Formation. Weald Clay was extracted until recently for brick-making.

There are various pits and ponds in the south of the District that remain as a legacy from the age of the Wealden Iron Industry. This extractive and smelting industry developed, flourished

and then declined well before the arrival of the railways and before the development of good road links.

There are several former military sites in the District including barracks and airfields, some of which have already been re-developed.

The Council's Contamination Duties

The Council has a register of contaminated land which identifies the location and the extent of sites issued with remediation notices, the nature of the harm or pollution and the current use of the land. Planning permissions on sites where contamination could be an issue are subject to planning conditions requiring investigation, and remediation where necessary.

In carrying out its inspection duty the Council implements a strategic and prioritised approach to the management of contaminated land in order to:

- Protect human health.
- Protect controlled waters that are used, or intended to be used, for the supply of drinking water for human consumption.
- Protect designated ecosystems.
- Prevent damage to property.
- Prevent any further contamination of land.
- Encourage voluntary remediation.
- Encourage re-use of brownfield sites.

Priority is given to the inspection of sites with the greatest risk or potential risk of causing harm to human health or to the environment. Sites requiring urgent attention take precedence.

Land contamination issues (SA Objective 13) overlaps with water quality issues (SA Objective 12). The largest residential areas in the Tandridge District (Caterham, Oxted, Warlingham and Whyteleafe) are situated over major aquifers with areas of high groundwater vulnerability, consequently inspection of these areas has also evaluated whether pollution of controlled waters is being, or is likely to be, caused. The villages of Woldingham, Godstone, Nutfield, Bletchingley and Limpsfield Chart are similarly situated over areas of groundwater vulnerability and consequently have been inspected regarding both the risk to human health and to the risk of groundwater pollution. Most of the other smaller settlements in the District are situated over non-aquifers where the principal receptors are humans and controlled surface waters.

Several areas of brownfield land that have already been redeveloped or are currently scheduled for redevelopment have been subjected to geotechnical site investigation as part of the planning process. In some cases this has highlighted the requirement for remediation before commencing the proposed redevelopment. Site condition reports for these sites have been reviewed as part of the Contaminated Land Inspection Strategy.

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

Air quality can be an issue, particularly arising from traffic and congestion on the strategic and local road network, amplified by a large reliance on private vehicular transportation. Stop start driving conditions and slower vehicle speeds resulting from congestion can lead to higher roadside pollutant concentrations, hence causing greater risks to pedestrians and adjacent residential properties. Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas.

Legislation and Guidance

European Union (EU) air quality legislation is provided within the Clean Air for Europe Directive 2008/50/EC⁵, which came into force on 11th June 2008. This Directive consolidated previous legislation which was designed to deal with specific pollutants in a consistent manner and provided new air quality objectives. The UK Air Quality Standards Regulations (2010)⁶ came into force on 11th June 2010 and transposed the EU Directive 2008/50/EC⁵ into UK law. The National Planning Policy Framework (NPPF) (DCLG, 2012) states that “Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.”

The NPPF was supplemented by Planning Practice Guidance (PPG) in March 2014. The PPG states that “Whether or not air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to generate air quality impact in an area where air quality is known to be poor. They could also arise where the development is likely to adversely impact upon the implementation of air quality strategies and action plans and/or, in particular, lead to a breach of EU legislation (including that applicable to wildlife)....”

There are no air quality management areas (AQMAs) in TDC. Figure 1-1 shows the location of nearby AQMAs which are to the north in the London Borough of Croydon, to the west in Reigate and Banstead and to the east in Sevenoaks.

Tandridge Air Quality

⁵ Council of European Communities (2008), Ambient Air Quality and Cleaner Air for Europe Directive, 2008/50/EC

⁶ H.M. Government (2010), The Air Quality Standards Regulations. SI 1001, the Stationary Office

The air quality in Tandridge is within national limits and, to date, no Air Quality Management Areas (AQMA) have been declared. Tandridge is a mostly rural area with little industrial activity to affect air quality levels with the pollutants of concern. The main pollution source is road traffic and so nitrogen dioxide diffusion tubes are deployed around the District to monitor trends where main roads run through residential areas. As part of the Local Air Quality Management duties, specified by the Environment Act 1995, the Council is required to continually monitor the quality of the air in the District, producing annual reports and assessments. DEFRA publishes technical guidance to help councils with their assessments and requires them to produce regular reports which are scrutinized by their air quality experts. The results of the most recent Air Quality Annual Status Report can be seen in Appendix 1 (Figures 013.1-013.3).

It is however, to be expected that areas in close proximity to the M25 and M23 motorways and busy traffic thoroughfares will be susceptible to higher levels of air pollutants from motor vehicles. Whilst motorway traffic is largely outside of the Council's control, it is expected that by strategically guiding new development towards existing built-up areas in the District, the need to travel by car is reduced thereby reducing vehicle emissions.

The Council has reviewed the likely air quality impacts of different development scenarios as part of an 'Air Quality Impact Assessment'.

Tandridge District Council currently participates in meetings of the Surrey Air Alliance (SAA), which is also attended by delegates from Surrey County Council's Public Health, Travel Smart and Highways teams. The SAA is the source of a number of initiatives and recommendations to improve air quality, including a draft Low Emissions Strategy (LES), Electric Vehicle Strategy and a set of county wide air quality planning conditions. The Surrey Transport Plan also has a key role in addressing air quality, particularly via its Air Quality Strategy.

Noise pollution

Town centres and villages inevitably have a degree of background noise from everyday activities. In the more rural areas, agricultural activities, livestock and wildlife all contribute to the variety of different sounds in the countryside. It is only when a 'sound' exists in the wrong place or at the wrong time such that it causes or contributes to some harmful or otherwise unwanted affect that it becomes 'noise pollution'. The Council recognises that unwanted sound can have a significant effect on the environment and on the quality of life enjoyed by individuals and communities.

The southern part of the District is affected by the noise of aircraft using Gatwick Airport. To a lesser extent areas adjoining Redhill Aerodrome are also affected by aircraft noise. Although individual noise events have reduced, primarily due to the introduction of quieter aircraft, the number of aircraft movements has increased.

The M25 motorway passes through the northern part of the District, between Caterham and Oxted and the M23 runs north to south on the western side of the District. High levels of vehicular movements also take place on the A25, which passes east-west across the District

and the A22 which passes north-south through the District. Railway lines also pass through the District. All of these are potential noise generators.

To assist in the determination of applications for new residential development proposed close to transport-related noise sources, the long established concept of Noise Exposure Categories (NEC) is utilised. The NEC range from A to D, with category A representing the circumstances in which noise is unlikely to be a determining factor, while category D relates to the situation in which development should normally be refused. This procedure of using NEC cannot be used in the reverse context for proposals which would introduce new noise sources into areas of existing residential development.

Light pollution

Lighting in itself is not a problem; it only becomes a problem where it is excessive, poorly designed, badly installed or poorly maintained. Light pollution can affect both urban and rural areas, but it is a particular problem in the countryside where dark skies at night are one of the special intrinsic qualities of the rural landscape. Artificial lighting can obscure the stars, introduce an urban character into rural areas, intrude on residential amenity and affect the ecology and wildlife of an area. Light pollution also represents a waste of energy and resources.

SA objective 15: To protect and enhance landscape character

Introduction

Tandridge District consists of substantial areas of high quality countryside, including wooded ridges and distinctive arable plains. Tandridge has a more open character than much of Surrey as woodland was cleared to make way for pasture fields. Clearance has resulted in a predominance of smaller, more irregular, woods often along the edges of fields. The species richness found in many of these shaws indicates that these are remnants of Ancient Woodland which survived the historical clearance.

There are two Areas of Outstanding Natural Beauty (AONB) in the District: Surrey Hills in the north and High Weald in the south-east, which are discussed in more detail below, and visible on Map A.17 in Appendix 1. The NPPF establishes that AONBs have the highest status of protection in relation to landscape and scenic beauty, equivalent to national parks, and that great weight should be given to conserving their landscape and scenic beauty

The District also has a long-standing history of having the highest percentage of Green Belt of any authority in England (23,304 hectares being 94% of the total area of the District). However Green Belt is neither a landscape designation, nor a factor in the shared SA Framework objectives previously agreed by the East Surrey planning authorities.

Landscape Character Areas

The county wide assessment of the landscapes in Surrey was carried out in 2015 and is being used to inform plan-making. The Surrey Landscape Character Assessment (LCA) identifies the components of the landscape including the underlying geology, soils, topography, land cover

hydrology, vegetation, historic and cultural development and physical features and describes how these elements and features combine to make one place different from another. In the case of Tandridge, 8 landscape types were found to exist in the District visible on Map A.18 in Appendix 1.

Landscape Assessments

Given the importance of landscapes in the District, the Council carried out further work independently on a site-by-site basis when determining site allocations. These are set out in the Tandridge Landscape Capacity and Sensitivity Study which were undertaken between 2016 and 2018 and are published as evidence for the Local Plan.

Surrey Hills AONB

The Surrey Hills was one of the first landscapes in the country to be designated an Area of Outstanding Natural Beauty (AONB) in 1958. It is now one of 38 AONBs in England and Wales. The Surrey Hills AONB stretches across rural Surrey, covering a quarter of the county and includes the chalk slopes of the North Downs at Farnham and flows through landscapes and multiple districts and boroughs to Tandridge, including Oxted and Woldingham in the east.

The Surrey Hills AONB covers 2,973ha or 12% of Tandridge. It crosses the District and is contiguous with the adjoining Kent Downs. It should be noted that a review of the AONB boundary by Natural England had been planned for 2017 to incorporate some areas of the 'Area of Great Landscape Value'.

The AONB is covered by an adopted Management Plan prepared by the AONB Joint Advisory Committees on behalf of the Council, which will be used as the principal means of guiding the future management and enhancement of these areas. This Management Plan has been prepared by the Surrey Hills AONB Board and adopted by Guildford Borough Council, Mole Valley District Council, Reigate and Banstead Borough Council, Tandridge District Council, Waverley Borough Council and Surrey County Council. The Countryside and Rights of Way Act (2000) placed a statutory duty on AONB local authorities to produce and review Management Plans that will formulate their policy for the management of the area.

High Weald AONB

The High Weald AONB covers 1,016 ha or 4.1% of the District, and is located in the south east corner. It extends across a wide area of Kent, East Sussex and West Sussex.

It is a medieval landscape of wooded, rolling hills studded with sandstone outcrops; small, Irregular-shaped fields, scattered farmsteads, and ancient route-ways. In comparison to the Surrey Hills where important and far-reaching views are synonymous, the High Weald can be characterised as having a much 'hidden' landscape where the varied topography and copious woodland hinder long-views. Instead, the focus in the High Weald is much more on landscape components and cultural heritage. Unlike the Surrey Hills AONB, there is limited built form

within the vicinity of the High Weald and none of the District's established settlements are covered by the designation.

Areas of Great Landscape Value (AGLV)

A further area of 5,770 hectares outside the AONBs are designated as an Area of Great Landscape Value (AGLV). In total some 9,760 hectares (39.3%) of the District is covered by the AGLV designation, which can be seen on Map A.19 of Appendix 1. The AGLV covers six Surrey authorities in total and originates from the expired Surrey County Structure Plan. Historically, the AGLV has acted as a buffer to the AONB but also has its own inherent landscape quality. It has performed an important role in conserving the landscape setting of some towns and villages.

For much of Tandridge, the AONB and AGLV designations are contiguous and have served the landscapes of the District well, although as a local designation, the AGLV holds less weight than the AONB in policy terms and this is confirmed by the National Planning Policy Framework (paragraphs 113 and 115).

A countywide review of the AGLV was undertaken in 2007, the outcome of which grouped the AGLV into three categories:

- parts that shared identical characteristics with the AONB;
- parts sharing some characteristics with the AONB; and
- parts sharing few or no characteristics with the AONB.

The assessment recommended an urgent review of the AONB boundary and that no areas should be removed from AGLV designation until the case for an amended AONB boundary has been considered. In 2013, Natural England, which is the statutory body charged with the review and designation of AONBs, agreed there should be a Landscape Character Assessment and Evaluation of natural beauty of neighbouring areas to the AONB. This assessment recommended 38 candidate areas to be included within the Surrey Hills AONB, primarily including land which is part of the AGLV, but other areas too where AONB characteristics were identified. Natural England has included the boundary review in its corporate plan to 2018 and it is anticipated to commence in late 2018.

Review of Areas of Outstanding Natural Beauty

In May 2018, the Government announced its commitment to conserving and enhancing England's most cherished landscapes by launching a nation-wide review into the nation's National Parks and Areas of Outstanding Natural Beauty (AONBs).

Information available does not indicate that this will replace the review of the Surrey Hills AONB, but is likely to supplement it. It is understood that the national review will be more high-level and look at how these iconic landscapes meet the needs of the 21st century – including whether there is scope for the current network of 34 AONBs and 10 National Parks to expand. The national review will also explore how access to these landscapes can be improved, how those who live and work in them can be better supported, and their role in growing the rural economy.

Weakening or undermining their existing protections or geographic scope will not be part of the review, which will instead focus on how designated areas can boost wildlife, support the recovery of natural habitats and connect more people with nature. Undertaking a review is one of the key commitments of the Government's 25 Year Environment Plan, which outlines their vision for improving the environment over a generation by connecting people with nature and helping wildlife to thrive.

SA objective 16: To conserve and enhance biodiversity

Introduction

Tandridge District has extensive biodiversity with:

- 8 Sites of Special Scientific Interest within the District and 4 within 1km of the District boundary;
- Special Protection Area consultation zones for both the Mole Gap to Reigate Escarpment SAC and the Ashdown Forest SPA/SAC (in neighbouring local authority areas);
- Numerous Sites of Nature Conservation Importance (SNCI) and other potential SNCIs, as proposed by Surrey Wildlife Trust;
- a number of Biodiversity Opportunity Areas identified by the Surrey Wildlife Partnership;
- Several hundred Ancient Woodlands;

These can be seen on Map A.20 of Appendix 1.

The majority of the area can be described as countryside, made up of small agricultural fields, woodlands connected by hedgerows, wetlands, ponds and rivers. The District's biodiversity value must be protected, properly managed and if possible enhanced, not only because of its intrinsic value but also because it contributes to human well-being.

Tandridge's desirability as a place to live, work and visit is closely linked to its pleasant rural environment.

Ancient Woodland

Surrey is England's most wooded county, with woodland covering over a fifth of the county, approximately 24%. A quarter of these woods are recorded as Ancient Woodland. Ancient woods are those that are known to have had continuous tree cover since at least 1600 AD, as a result they are species rich. Ancient Woodlands are widely recognised as irreplaceable habitats, and it is important that local planning protects them. In 2011, the Council in partnership with the Surrey Wildlife Trust completed a survey of Ancient Woodland in Surrey, producing and publishing an inventory. The extent of the District's ancient woodland can be seen on Map A.23 of Appendix 1.

Surrey Biodiversity Opportunity Areas (BOAs)

BOAs represent a targeted landscape-scale approach to conserving biodiversity in Surrey and the basis for an ecological network, in line with NPPF paragraphs 110, 114 and 117. BOAs identify where the greatest opportunities for habitat creation and restoration lie, enabling the efficient focusing of resources to where they will have the greatest positive conservation impact.

BOAs will have multiple benefits, improving the natural environment and providing quality areas in which people want to live and work. BOAs do not have statutory or policy status and

are not seen as constraints to development, rather they flag up opportunities to incorporate biodiversity enhancement into the master planning and design of new development, in line with the national and local policy objectives listed above.

In Tandridge the BOAs comprise parts of the North Downs, the Wealden Greensand and river valleys. The extent of the District’s BOAs can be seen on Map A.24 of Appendix 1.

BAP Priority Habitats

The UK Biodiversity Action Plan (UK BAP) describes the UK’s biological resources and sets out a plan for their protection. This responded to the Convention on Biological Diversity to which the UK signed in 1992, committing to halt the decline of biodiversity by 2010. Biodiversity 2020: A strategy for England’s wildlife and ecosystem services is the renewed national strategy to continue this work. There are a number of known UK BAP Priority habitats in Tandridge, predominantly broadleaved woodland. These habitats do not receive statutory protection, but it is important planning takes account of them. They will be found both within and outside designated sites. A map of their distribution across Surrey can be seen in Appendix 1 (Map A.18)

Protected Species

In addition to listing Priority habitats the UK, the BAP also identifies Priority species for conservation in the UK. There are 1,149 BAP species nationally and at least 337 of these are known to occur in Surrey. Locations where Priority species have been recorded in Surrey are identified on Map A.19. Priority species are likely to be found both within and outside of designated sites; many will be associated with Priority habitats, but not exclusively so.

There are a number of areas and sites of importance to biodiversity within the county, which are identified via other mechanisms and in addition to the biodiversity planning policy and legislation covered by this document. These include various types of nature reserves, Areas of Outstanding Natural Beauty, and within the wider Green Belt.

Local Nature Reserves

There are three local nature reserves looked after by Tandridge District Council:

Blindley Heath near Lingfield

Centenary Fields, Lingfield

Lingfield Wildlife Area

Internationally Protected Sites and Habitats Regulations Assessment

The Local Plan and the SA is supported by a Habitats Regulations Assessment (HRA). The purpose of Habitats Regulations Assessment (HRA) of land use plans is to ensure that

consideration is given to sites protected by European Directives as part of the development of planning policy. Such sites include those designated as:

- Special Areas of Conservation (SACs) – sites designated for flora, fauna and habitats of community interest under powers derived from the Habitats Directive.
- Special Protection Areas (SPAs) – sites designated to conserve the habitat of protected wild birds to ensure their survival and reproduction in their area of distribution under powers derived from Directive 2009/147/EC on the conservation of wild birds (usually referred to as the Birds Directive).

Standards

Standards for access to the natural environment include

- Natural England’s Access to Natural Greenspace Standard (ANGSt)
- Woodland Trust’s Woodland Access Standard

The application of these two standards has been considered further in the Council’s open space background evidence report.

Challenges

[Section 40 of the Natural Environment and Rural Communities Act 2006](#), places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision-making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by government in its [Biodiversity 2020 strategy](#).

Biodiversity maintenance and enhancements through the planning system have the potential to make a significant contribution to the achievement of Biodiversity 2020 targets.

The quality and diversity of habitats in the District should continue to be protected and the quality of habitats should be improved, where possible, to increase biodiversity. This needs to be balanced with the needs of leisure / recreation and wider development requirements and with the vulnerability of important areas of biodiversity.

The biodiversity of Tandridge faces the deeply worrying threat from future rapid climate change. All predictions indicate that over the current millennium we will experience hotter, drier summers and warmer, wetter winters with an increasing frequency of extreme weather events. Adaptation to climatic change is a major evolutionary driver, but the pace and scale of this man-induced change will be unprecedented. Moreover, an inability for wildlife populations to respond naturally by extending their ranges in a generally northward, cooler direction due to habitat discontinuity in the modern fragmented landscape, will surely result in many untimely local (and ultimately national) extinctions.

4. APPRAISAL METHODOLOGY

4.1 Who carried out the SA

The SA was carried out by the Strategy Team of Tandridge District Council. The SA Framework, which is discussed in the next section, was agreed in partnership between East Surrey planning authorities.

4.2 The SA Framework

The Council is required to outline the sustainability objectives and criteria against which the alternative options of plans will be appraised in order to make the appropriate plan as sustainable as possible.

The framework in Table 1 is made up of 16 objectives and decision-aiding questions tailored to the key sustainability issues for Tandridge District.

The SA framework used within Tandridge dates back to 2004 and was developed through a series of workshops and working groups held jointly with other Surrey local planning authorities, Surrey County Council and with the statutory environmental consultation bodies. Through this joint working an original suite of 23 SA Objectives was established to enable the East Surrey authorities to assess their development plans by a process of 'peer review'. In summer 2012, and again following the NPPF, the East Surrey authorities⁷ 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. The SA Objectives were consulted on in April 2015 and having incorporated comments received, a final version of the objectives was drawn up. The SA Framework was also presented in the SA Scoping Report.

Table 3 sets out the 16 East Surrey Sustainability Appraisal objectives and their related NPPF theme and the decision-aiding questions.

The SA Framework was first presented in Tandridge DC's SA process in the November 2015 Scoping Report⁸.

It should be noted that Green belt is not a factor in the SA framework and is not referred to in the pre-existing 'decision-aiding questions' that have been agreed by East Surrey

⁷ Tandridge DC; Mole Valley DC; Reigate and Banstead BC; Epsom and Ewell BC; and Spelthorne BC

⁸ <https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Evidence%20base%20and%20technical%20studies/Sustainability-Appraisal-Scoping-Report-2015.pdf>

authorities. Therefore, the outcomes of the separate evidence work looking at Green Belt exceptional circumstances is not factored into the SA. However factors indirectly related to Green Belt may inadvertently be reflected in other objectives. For example, Tandridge is a historically rural district, so developments within the countryside may weigh against the cultural heritage element of SA objective 3. Similarly, development in the open countryside between settlements may inevitably weigh against SA Objective 15 'to protect and enhance landscape character'.

Table 3: The SA Framework

Objective		NPPF theme	Decision-aiding Questions
1	To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	<p>Social – the objective accords with the NPPF theme by providing the supply of housing required to meet the needs of present and future generations.</p> <p>Economic – the construction industry plays a significant economic and employment role within the area, therefore the objective will contribute to building a strong economy. High quality residential areas also create attractive areas for businesses to locate to.</p>	<ul style="list-style-type: none"> ▪ Will the option boost the supply of housing? ▪ Promote improvements in the availability and quality of the housing stock? ▪ Will the option help provide a supply of affordable homes to meet identified needs? ▪ Will the option help to reduce the number of homeless in the District? ▪ Will the option increase the amount of extra-care or enhanced sheltered accommodation? ▪ Will the option have a significant detrimental effect on the financial viability of delivering future housing?
2	To facilitate the improved health and well-being of the whole population.	<p>Social – the objective will assist in supporting strong, vibrant, inclusive, safe and healthy communities.</p>	<ul style="list-style-type: none"> ▪ Will the option help to improve the health of the community? ▪ Will the option improve access to health provision? ▪ Will the option encourage healthy lifestyles? ▪ Will the option enhance access to natural urban greenspace? ▪ Will the option help people to remain independent and provide assistance to single parents, the elderly, those with ill health or disability? ▪ Will the option reduce crime and fear of crime? ▪ Will the option help overcome social exclusion? ▪ Will the option help address the issues of deprivation and poverty?
3	To conserve and enhance, archaeological, historic and cultural assets.	<p>Economic – the protection of historic and cultural assets will support the tourism economy and create attractive areas for businesses to locate to.</p> <p>Social – within the respective areas the objective will maintain a high quality built environment.</p>	<ul style="list-style-type: none"> ▪ Will the option enhance the historic and cultural assets? ▪ Will the option continue to protect and/or enhance cultural assets? ▪ Will it protect Registered Parks and Gardens? ▪ Will it preserve or enhance the character or appearance of conservation areas and their setting? ▪ Will it conserve important heritage assets buildings and townscapes? ▪ Will the option improve access to the authority’s cultural assets? ▪ Will the option promote sensitive re-use of important buildings, where appropriate?

Objective	NPPF theme	Decision-aiding Questions
<p>4 To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.</p>	<p>Economic – an inadequate transport system will have significant detrimental effects on the economy, therefore, this objective will ensure that the required transport infrastructure is provided to assist in the building of a strong, responsive and competitive economy.</p> <p>Social – the objective will help create accessible local services.</p> <p>Environmental – sustainable transport will mitigate climate change and assist with the move to a low carbon economy.</p>	<ul style="list-style-type: none"> ▪ Will the option reduce the need to travel, especially by private motorised vehicles? ▪ Will the option provide charging infrastructure for electric vehicles? ▪ Will the option reduce congestion or minimise unavoidable increases in congestion? ▪ Will the option reduce the need for car ownership? ▪ Will the option help provide walking/cycling/public transport infrastructure, including choice and interchange? ▪ Will the option be accommodated within the existing public transport constraints? ▪ Will the option reduce the need for road freight? ▪ Will the option improve access to the countryside and historic environments? ▪ Will the option improve access to key services (education, employment, recreation, health, community services, cultural assets)? ▪ Will the option enhance access to natural urban greenspace? ▪ Will the option provide safe pedestrian and cycle routes? ▪ Will the option improve the provision of affordable transport?
<p>5 To make the best use of previously developed land and existing buildings.</p>	<p>Economic – policies enabling the use of previously developed land will ensure that a responsive approach to land use is available.</p> <p>Social – the use of previously developed land for residential development will provide a significant supply of housing to help meet the needs of present and future generations.</p> <p>Environmental – the decision-aiding questions for this objective will ensure that PDL will be reused provided that it is not of high environmental value.</p>	<ul style="list-style-type: none"> ▪ Will the option encourage reusing PDL provided it is not of high environmental value? ▪ Will the option encourage the re-use of existing buildings? ▪ Will the option ensure that development is making the best use of land?
<p>6 To support economic growth this</p>	<p>Economic – the objective will contribute to building a strong, responsive, innovative and competitive economy.</p>	<ul style="list-style-type: none"> ▪ Will the option support sustainable growth and encourage the provision of a range of jobs that are accessible to residents? ▪ Will the option provide for the needs of businesses? ▪ Will the option provide for new or emerging sectors?

Objective	NPPF theme	Decision-aiding Questions
is inclusive, innovative and sustainable.	<p>Social – a strong economy that keeps unemployment levels low will help support strong, vibrant and healthy communities.</p> <p>Environmental – the support of innovative technologies will assist in the move to a low carbon economy.</p>	<ul style="list-style-type: none"> ▪ Will the option facilitate flexible working practices? ▪ Will the option support the clusters or network of knowledge driven, creative or high technology industries? ▪ Will the option increase the likelihood of local jobs being filled by local people? ▪ Will the option promote the viability, vitality and competitiveness of town centres and encourage their commercial renewal? ▪ Will the option facilitate and encourage the building of a skilled local workforce? ▪ Will the option encourage mixed-use development?
7 To provide for employment opportunities to meet the needs of the local economy.	<p>Economic – the objective will contribute to building a strong, responsive and competitive local economy.</p> <p>Social – a local economy will support strong, vibrant and healthy communities.</p> <p>Environmental – promoting the local economy will reduce the need to travel and therefore mitigate against climate change.</p>	<ul style="list-style-type: none"> ▪ Will the option provide for the needs of the economy, especially local business? ▪ Will the option encourage diversity and quality of employment? ▪ Will the option encourage rural diversification? ▪ Will the option provide for the needs of business in urban and rural areas (such as range of premises, land, infrastructure and services)? ▪ Will the option have a significant detrimental effect on the financial viability of delivery of future employment development?
8 To reduce greenhouse gas emissions and move to a low carbon economy.	<p>Economic – the objective will contribute to building an innovative economy. Social – support long-term positive impacts on the overall quality of life for current and future generations. Environmental – the objective will have significant environmental benefits as it will mitigate climate change.</p>	<ul style="list-style-type: none"> ▪ Will the option reduce emissions? ▪ Will the option reduce the need for energy use? ▪ Will the option support de-centralised energy generation? ▪ Will the option facilitate the generation/use of renewable energy?
9 To use natural resources prudently.	<p>Environmental – the prudent use of natural resources will greatly assist in the protection of the environment.</p> <p>Social - prudent use of natural resources supports long-term positive impacts on the overall quality of life for current and future</p>	<ul style="list-style-type: none"> ▪ Will the option encourage the use and supply of sustainable local products or services? ▪ Will the option help reduce the environmental impacts of products and services? ▪ Will the option reduce the use of primary resources, or create markets for recycled materials?

Objective	NPPF theme	Decision-aiding Questions
	generations. Economic – the objective will also promote long-term positive impacts for businesses in the future as it seeks to protect finite natural resources.	<ul style="list-style-type: none"> ▪ Will the option encourage the efficient use of mineral resources? ▪ Will the option positively impact on residents lifestyle choices to encourage their prudent use of natural resources? ▪ Will the option promote reuse and recycling of materials? ▪ Will the option allow the efficient storage and collection of waste and allows for this to be managed close to where it arises? ▪ Will the option allow waste to be managed close to where it arises? ▪ Will the option minimise the production of waste?
10	To adapt to the changing climate.	<p>Economic – the provision of adequate climate change resilient infrastructure will help to protect and future proof businesses within the area. Social – adapting to climate change will help to maintain a healthy community. Environmental – protection of the environment plays a key role in the area adapting to climate change.</p> <ul style="list-style-type: none"> ▪ Will the option help in protecting the community from the increased extremes of weather, which are projected to occur more often with climate change (heat waves, drought and flooding)? ▪ Will the option reduce the opportunity to adapt in the future?
11	To reduce flood risk.	<p>Economic – the objective will promote the provision of flood defence infrastructure and help to make local businesses resilient to flood events. Social – flooding can have a significant impact on the health and well-being of a community. Environmental – flood resilience will ensure that communities are able to adapt to climate change.</p> <ul style="list-style-type: none"> ▪ Will the option reduce the risk of fluvial, surface water, groundwater and sewer flooding to existing and future development? ▪ Will the option keep development away from areas at risk to flooding? ▪ Will the option reduce the risk of flooding to adjacent development? ▪ Will the option help to reduce the rate of run-off? ▪ Will the option encourage Sustainable Urban Drainage Schemes? ▪ Will the option ensure that increased flooding extremes can be withstood?
12	To improve the water quality of rivers and groundwater , and maintain an	<p>Social – improvements in water resources and supply e.g. drinking water provision</p> <p>Environmental – the objective will help to improve biodiversity, use natural resources prudently and minimise pollution.</p> <ul style="list-style-type: none"> ▪ Will the option improve quality and maintain an adequate supply of water? ▪ Will the option reduce pollution of groundwater, watercourses and rivers from run-off/point-sources? ▪ Will the amount of nitrates/phosphates entering the water environment be reduced? ▪ Will the option provide adequate utilities infrastructure to service development to avoid unacceptable impacts on the environment? ▪ Will the option safeguard water resources to maintain an adequate level of

Objective		NPPF theme	Decision-aiding Questions
	adequate supply of water.		<ul style="list-style-type: none"> river and ground water? ▪ Will the option reduce the demand for water? ▪ Will the option encourage water to be stored for re-use?
13	To reduce land contamination and safeguard soil quality and quantity.	<p>Economic – protection of high quality agricultural land will help to protect the rural economy. Environmental – the objective will contribute to the protection and enhancement of the natural environment.</p>	<ul style="list-style-type: none"> ▪ Will the option reduce the risk of land contamination and protect good quality soil? ▪ Will the option reduce the risk of creating further contamination? ▪ Will the option help to remediate contaminated sites and where possible carry this out on-site? ▪ Will the option prevent soil erosion? ▪ Will the option minimise the loss of good quality agricultural land?
14	To ensure air quality continues to improve and noise and light pollution are reduced.	<p>Social – improvements in air, noise and light pollution will support healthy communities. Environmental – the objective will help to protect the natural environment, improve biodiversity and mitigate against climate change.</p>	<ul style="list-style-type: none"> ▪ Will the option reduce air, noise and light pollution? ▪ Will the option help improve air quality? ▪ Will the option support specific actions in designated AQMAs? ▪ Will the option reduce pollution from traffic? ▪ Will the option encourage the creation of tranquil areas? ▪ Will the option ensure that people are not exposed to greater levels of noise? ▪ Will the option help reduce light pollution?
15	To protect and enhance landscape character.	<p>Social – the enhancement of the natural environment will support the community’s health and social well-being. Environmental – the objective contribute to the protection and enhancement of our natural environment. Economic – character of the natural environment is a consideration within “smart growth” as they are attractive areas to locate to.</p>	<ul style="list-style-type: none"> ▪ Will the option protect and enhance the landscape character areas within the authority area? ▪ Will the option protect and enhance the Authority’s natural urban greenspace? ▪ Will the option protect the AONB, AGLV, and SAC? ▪ Will the option protect significant views? ▪ Will the option protect and enhance landscape character? ▪ Will the option protect the urban fringe? ▪ Will the option protect the open countryside?

Objective		NPPF theme	Decision-aiding Questions
16	To conserve and enhance biodiversity.	Social – the enhancement of biodiversity will support the community’s health and social well-being. Environmental – the objective will help to conserve and improve biodiversity.	<ul style="list-style-type: none"> ▪ Will the option prevent fragmentation, increase connectivity and create more habitats? ▪ Will the option secure enhancement in biodiversity in all new development? ▪ Will the option continue to protect formally designated areas of nature conservation? ▪ Will the option take account of the effects of climate change on biodiversity? ▪ Will the option adequately defend and enhance protected species? ▪ Will the option protect SSSI, SNCI and other designated biodiversity areas (e.g. SPA)?

4.3 Compatibility of SA Objectives

One of the difficulties encountered when undertaking sustainability appraisal is that objectives themselves may, to some extent at least, be inherently incompatible. Conflicts may exist between objectives and what they aim to achieve.

Table 4 below shows the compatibility and potential conflicts between the Sustainability Objectives.

Highlighting these potential inconsistencies between different Sustainability Objectives allows the framework to try to balance these issues, or determine where the priorities should lie. Where possible, a mutually beneficial or compromise solution should be sought.

In addition to highlighted red crosses, a number of inter-relationships are marked '?' to indicate uncertainty. Therefore, in such circumstances there is at least the possibility of incompatibility and these are also discussed alongside potential conflicts below.

The potential for conflicts in achieving development objectives and environmental objectives may arise particularly around the prioritisation of space and land to meet different objectives. Some of the conflicts which the matrix highlights include tensions between economic growth and environmental impacts. The compatibility of residential development is unknown with many objectives, as much depends on the case by case location.

Table 4: Compatibility of SA Objectives

		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
1	To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.	■															
2	To facilitate the improved health and wellbeing of the whole population.	++	■														
3	To conserve and enhance, archaeological, historic and cultural assets.	?	+	■													
4	To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.	+	++	O	■												
5	To make the best use of previously developed land and existing buildings.	?	+	Nc	+	■											
6	To support economic growth which is inclusive, innovative and sustainable.	++	+	O	+	++	■										
7	To provide for employment opportunities to meet the needs of the local economy.	++	++	O	+	+	++	■									
8	To reduce greenhouse gas emissions and move to a low carbon economy.	?	++	O	++	++	-	+	■								
9	To use natural resources prudently.	?	++	+	++	++	-	-	++	■							
10	To adapt to the changing climate.	?	++	+	++	++	-	O	++	++	■						
11	To reduce flood risk.	?	++	O	Nc	++	Nc	Nc	+	O	++	■					
12	To improve the water quality of rivers and groundwater, and maintain an adequate supply of water.	?	++	Nc	+	+	O	Nc	+	+	+	+	■				
13	To reduce land contamination and safeguard soil quality and quantity.	?	++	Nc	O	?	O	O	+	+	+	+	++	■			
14	To ensure air quality continues to improve and noise and light pollution are reduced.	-	++	Nc	++	O	O	O	++	+	++	Nc	+		■		
15	To protect and enhance landscape character.	-	++	++	++	+	-	-	O	+	+	O	+			■	
16	To conserve and enhance biodiversity.	?	+	+	+	+	-	O	+	+	++	+	++				■

4.4 Assessment Scoring

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.

Symbol	Likely Impact
++	Major Positive
+	Minor Positive
O	Neutral / Negligible
-	Minor Negative
--	Major Negative
?	Uncertain
n/a	Not applicable
Nc	No correlation

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.

The assessment draws on 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. The extent of significance is perhaps most helpfully expressed by orders of magnitude.

To understand the overall effect of the site or policy being assessed, the effect identified against each objective needs to be taken into account to gain a balanced outcome that takes into account the environmental, social and economic aspects of sustainability. A site or policy that is found to have negative effects against certain objectives is not necessarily unsuitable as these negatives must be considered in light of any positive effects that may have been identified. Note too that the impact magnitudes are not intended to be summed. For example, two '+' are not to be considered equal to a single '++'. The scores assigned are a matter of professional judgement taking into account the baseline data, policy context and other sources of information available to inform the assessment.

Box 2.1 Annex II of the SEA Directive Criteria for determining the likely significance of effects referred to in Article 3(5) of the SEA Directive.

The characteristics of plans and programmes, having regard, in particular, to

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;

- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme;
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use;
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

4.4.1 Duration of Effects

The assessment matrices have considered the timescale of effects in relation to the plan period to 2033. Therefore definitions are approximately on the following basis:

- Short-Term Effects: 0-5years
- Medium-Term Effects: 5-10 years
- Long-Term Effects: 10 years +

Compliance with the SEA Directive

To have regard to “duration, frequency” and “the cumulative nature of the effects”.

Annex 2.2 SEA Directive

4.4.2 Geographic Scale

Geographic scale relates primarily to the level of importance of the receptor, or the level at which it is designated, if applicable. Geographic scale may also refer to the physical area of the receptor, or the part of the receptor likely to be affected.

Impact assessment in the sustainability appraisal considers a range of geographic scales and sensitivities at which the impact and subsequent effects might be experienced. A guide to the range of scales used in the impact significance matrix is presented in Table 5.

Table 5: Geographic scale

Sensitivity	Typical criteria
International / national	The international level is aimed at designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This also applies to predicted effects at the national level or designations/receptors that have a national dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas such as the East of England.
Local	This is the district and neighbourhood scale.

4.4.3 Impact Magnitude

Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the effect, as set out in Annex II of the SEA Directive.

Annex II of the SEA Directive

Criteria for determining the likely significance of effects referred to in Article 3(5) of the SEA Directive

The characteristics of plans and programmes, having regard, in particular, to

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme;
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use;
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

Impacts are assessed by combining judgements about susceptibility to the type of change arising from the specific proposal with judgements about the value attached to the receptor.

On a strategic basis, the appraisal considers the degree to which a location can accommodate change without detrimental effects on known receptors (identified in the baseline) and the degree to which individual receptors will be affected by the change. This is determined by considering factors included in Annex II of the SEA Directive:

- Probability
- Duration;
- Frequency; and
- Reversibility.

SA and SEA are concerned with likely significant effects. As such, if an effect is considered improbable, it will not be considered in assessment. 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.

4.5 Choice of Options

A balance has to be struck between the need to consider reasonable alternative options and the need to be proportionate. Clearly there are potentially thousands of possible options extending to relative minutiae of the plan. The SA's consideration of different possible options has had to strike a balance and has generally focussed on the more significant strategic choices – primarily relating to key principles and location of development.

A clear choice with every policy is to not have the policy, and assessing this has proven useful in confirming the value of the policy and what it aims to achieve.

The SA is also mindful that the Plan has been informed by extensive technical evidence, which has itself had to consider the options available. In most cases, the SA cannot replicate the specialist depth of analysis applied to individual subject areas by the technical evidence. This in turn may inform judgements made in the SA as to what constitutes a reasonable and genuine or realistic option, based upon the evidence.

4.6 Assumption and Limitations to Assessment

There are a number of limitations, which should be borne in mind when considering the results and conclusions of this assessment. 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. Every attempt has been made to ensure objective and consistent scoring over the process of the SA, which in some cases 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.

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.

