Appendix A

Local Plan Option profiles (January 2022)

1.0 Introduction

1.1 This paper presents detail around the Options presented to the Inspector in terms of how the Council should proceed with the Local Plan. The information includes: opportunities, risks and issues of each Option as well as high-level, approximate costings and timescales.

1.2 The final decision will be that of the Planning Inspector whose decision, on behalf of the Secretary of State, must accord with policy, legislation and the requirements of his role. He must be confident that, if the Council is to proceed with its Local Plan, a sound outcome can be achieved. Once the Council submits its response to the Inspector, the Council must wait his final response before knowing, for certain, what the next steps are for the Local Plan.

Time and resourcing implications

1.3 Each of the Option profiles includes a high-level assessment of what work would be anticipated but cannot be exact at this time. The Local Plan is an iterative process and while we cannot include those aspects that are unknown, the basic requirements of evidence gathering, and technical assessment are relatively established. The items of work included have been arrived at with a best understanding and are based on Officer experience where it applies.

1.4 Given that workstreams and timescales can only be indicative, they should not be considered to represent the formal workplan to be followed, but instead give an indication of what can be expected. The Inspector in his correspondence, both ID16 and ID19, has regard to this. Officers will need to review the timetable and seek to prepare a new Local Development Scheme ('LDS') for Committee approval, subject to any guidance from the Inspector.

Staffing

1.5 The current Strategy Team of 3.5FTE occupied posts is not staffed to respond to the level of work set out below and this would need to be addressed if any of the Options 2-4 are chosen by the Inspector. When fully staffed, the team is made up of 5.31FTE, including 4.5FTE strategy specialists and 0.81FTE, Head of Strategy.

1.6 The urgency of getting new staff in place may differ between Options and delivery will be dependent on a properly resourced and structured team. It is anticipated, that in addition to ensuring that all 5.31FTE posts are filled, the following further staff are estimated to be needed at this time:

- Option 1 an additional 1FTE Lead Strategy Specialist (M4-HOS1), 2 FTE Strategy Specialists (M3-M4) and 1 FTE junior planner (M2) from the point of commencing plan preparation until at least the point of submission, approximately 3 years.

- Option 2 - 4 an additional 2 FTE Strategy Specialists and 1 FTE junior planner (M2) from the point of commencing further work until at least the end of the main modifications consultation, approximately 18months.

1.7 Further detail on related budgets and staffing will need to be the subject of a report to the Committee following the Inspector's response and on consideration of the work to be done.

2.0 The Options

Option 1: To withdraw

2.1 Withdraw the Plan and commence the preparation of a new Plan as per current national planning policy. This option was raised by the Inspector in paragraph 63 of ID16 and paragraph 22 of ID19.

Snapshot - Risks, issues and opportunities

Risk/Issue	Opportunity
Loss of costs already spent on preparing the plan with a need to commit funding to the preparation of a new plan, against the Council's current financial challenges.	Prepare a new plan which can take into consideration the context of up to date policies and legislation. Any plan would not be at risk of being considered out of date or in need of early review.
Would need to prepare a plan within the context of new and emerging national policy which could be more challenging for the Local Authority and in the context of higher housing need numbers	Rather than continuing to invest in the current plan and the risks that come with this, there is an opportunity to direct budget into a new plan, after more thought is given to what the plan should include.
Reputational damage to the Council associated with costs incurred to date and the role of the Garden Community	Opportunity to begin with community consultation at the earliest stage to brief and engage with the community on the role and requirements of the Local Plan
Would result in a longer period of delay for having up to date planning policies, including around land supply, infrastructure and flooding, during which the content of the NPPF would assume greater importance in decision making.	Would give Neighbourhood Plan groups the certainty that they can be prepared against current adopted policies but won't preclude the need for them to be reviewed when a Local Plan is in place.
Implications for the assessment of planning applications, potential increase in speculative applications, appeals and costs due to land supply issues.	Would not necessarily mean all the work from the current plan is lost and some evidence bases could still be utilised in forming the next plan.

Community may not welcome further consultation rounds and would remain uncertain about the content of a Local Plan.	Opportunity to use the situation to challenge government, especially when considering the implications of Junction 6 and could provide time for increased lobbying and engagement with central government to resolve this issue.
While the need to implement the interim scheme at Junction 6 would be less pressing, this could be replaced with a more significant need for full, more complex, upgrade at a much higher cost.	The pressing need to implement the interim mitigation scheme at Junction 6 would be lessened.
A new plan does not guarantee that revisions to policies and allocations would be favoured by the community or other interested parties.	Would be in a position to take into account any necessary revisions to the corporate strategic plan, Surrey Hills AONB review, SCC infrastructure assessments, climate change work etc. It would also allow for the new planning reforms to become clearer which would otherwise present as an obstacle for a continuing plan.
Any update to the Community Infrastructure Levy would be delayed.	Would present an opportunity to revisit the spatial strategy if necessary.
The new spatial strategy could still require a strategic scale development, such as a garden community, which would need to be explored as a reasonable alternative spatial Option.	May provide an opportunity for more joined up planning with our neighbours, particularly Reigate and Banstead, if there was an option to do so. This would need to be discussed and agreed with our neighbours and planned accordingly.

What is the process?

Time and resourcing estimates

2.2 The following sets out the key pieces of evidence which would need to be prepared and timescales for preparing a new plan:

Option 1			
Work	**Timescale**	**Notes**	**Financial Year**
Full SHMA	3 months	Full commission, including review of Housing Market Assessment (HMA). This work would also need to be updated either at submission or examination, possibly both, due to population and household projections. We also can't know how the Strategic Housing Markey Assessment (SHMA) process will be affected by possible changes to the Standard Housing Methodology in future. Further, the SHMA would need to align with other authorities and may present an opportunity for joint working and cost saving but could equally present an obstacle in cooperation and for timescales.	22/23
Local Development Scheme (LDS) Review	1 month	This will be prepared following a decision on the Options and sent to Planning Policy Committee (PPC) for adoption. It is usual for an LDS to undergo further updates as it needs to respond to changing circumstances as the work progresses.	21/22
Review of Settlement Hierarchy	3 months	This would use the existing settlement hierarchy as the basis of work but seek to ensure the understanding of facilities remains up to date. This aspect of work is needed to inform any decisions on special strategy.	22/23
Climate Change and Renewable Energy Strategy	5 months	This is a new aspect of work for the District and while SCC is carrying out some work on this, it is	22/23

		unlikely to be locally specific enough to cover the preparation of effective local policies.	
Sustainability Assessment (SA)	Iterative for duration of plan-making.	Full external commission. This could be done on a retainer basis to ensure that all stages of SA are carried out by the same consultants. SA would be needed for each stage of consultation at least.	22/23, 23/24, 24/25, 25/26
Habitat Regulations Assessment (HRA)	At necessary stages of the Plan making process.	Full commission. This doesn't account for any HRA needed for main modifications either.	22/23, 23/24, 24/25, 25/26
Junction 6 Feasibility Work	1 -2 years depending on the extent of the junction improvements.	This element of work is highly detailed and includes economic modelling, testing options, third-party land considerations and costing. The Surrey County Council (SCC) feasibility fund could be utilised for this work and any work would need to be informed by full remodelling based on a preferred spatial strategy. SCC may also be able to contribute to this work but that would need to be explored with them. The extent of the mitigation needed for the junction is a large factor to the cost and length of this work which may need to look to the full-scale upgrade, rather than smaller scale interim solution under Option 2. The changes in transportation process post-COVID etc would also be a factor for this work.	22/23, 23/24, 24/25
Highways Modelling	Duration of the plan preparation.	This is the necessary modelling all Plans need. It tests sites, local roads and mitigation for the wider district etc. Highways modelling is always the most challenging part of plan-making, and while SCC do this work for free – their resource is such that we have previously paid for them to be supported so	22/23, 23/24, 24/25

		that our required timescale could be met. This is what the cost relates to against this item. All plan-making authorities must secure a slot in SCC Highway's schedule as modelling cannot take place for multiple authorities at the same time. This can add significant delay to a plan, especially where slippage occurs, which is not unusual.	
A22/Felbridge Junction Capacity Work	6 months	This work would require the involvement of SCC and WSCC. It may be possible to factor in this work as part of the wider strategic modelling and mitigation work, however, feasibility assessment would still be necessary, so it is being included separately.	23/24,
Infrastructure Delivery Plan	Needed for the duration of the plan with most work needed following Reg 18 and in the preparation of Reg 19.	It is highlighted that the Council does not currently have an infrastructure specialist in post, but this remains a vacancy - see comments on Staffing in Section 2. This aspect of work is crucial to the delivery of an effective plan that serves the interests of our communities and businesses. Infrastructure modelling and forecasting in an ongoing and complex process and the Council relies heavily on the input of providers to prepare the IDP.	22/23, 23/24, 24/25, 25/26
Biodiversity improvements site assessments	5 months	This is a new area of work arising from recent national policy changes and the recent Environment Act and gives rise to biodiversity net gain opportunities. It is possible that this work could be carried out by the same consultants who would	22/23, 23/24, 24/25

		conduct the site-based ecology assessments and could attract a cost saving. For now, however, this is being costed at a similar fee to the ecology work undertaken for the current plan as this would need to be carried out on several sites, not necessarily just new ones. Full account would also need to be taken of any proposals brought about by the implementation of the Environment Act 2021.	
Housing & Economic Land Availability Assessment (HELAA) review	3 months	More than one review would be needed to accord with current policy.	22/23, 23/24 and 24/25
Economic Need Assessment (ENA)	4 months	The last ENA was carried out in 2017 and as a needs assessment it would need to be updated, in part to take account of Covid. Delay could be incurred however, due to the availability of industry accepted Covid data.	22/23
Consultation: Regulation 18	4 months	Including analysis of representations. However, timing is dependent on additional resourcing for comment input and the number of comments received. The Council would need to agree what they want the Regulation 18 draft to include, i.e. a full draft of a plan, or a higher-level consideration of spatial Options etc. This will impact on the date which can be achieved. For the purposes of this paper, dates align with an Options type consultation.	22/23

Heritage Assessments	3 months	Heritage assessment would be carried out as part of the site selection process.	23/24
Retail Needs Assessment	2 months	As a need-based assessment this would need updating from previous work as not only would it be considered out of date, it would also benefit from post-Covid data.	22/23
Strategic Flood Risk Assessment	4 months	This would need to reflect the preferred spatial strategy and specific sites and would be externally commissioned. This would need to be done to inform finalising site selection and be prepared in advance of the sequential test and exception test. Subject to the content of the new plan, it may be that just the Level 2 stage of assessment needs to be reviewed.	23/24
Additional Landscape Capacity Assessments (New/Amended sites)	2 months	There is little reason to think that there would need to be a wholescale review of the landscape capacity assessments undertaken to inform the current draft plan. However, where new sites are being considered, this work would need to be done. For the benefits of cost saving, it is suggested that this work take place once a spatial strategy has been identified by the Council.	23/24
Additional Ecology Assessments (New/Amended Sites	2 months	There is little reason to think that there would need to be a wholescale review of the ecology assessments undertaken to inform the current draft plan. However, where new sites or materially amended sites are being considered, this work would need to be done.	23/24

		Ecology assessments may need to be scheduled for a specific season of the year to secure sound assessments. If the correct assessing window is missed, this can cause delay. For the benefits of cost saving, it is suggested that this work take place once a spatial strategy has been identified by the Council.	
Gypsy & Traveller Needs Assessment.	6 months	This work takes time due to the number of attempts to consult with the community which is needed to demonstrate sufficient efforts made to engage. Stakeholder consultation is also necessary and can be lengthy to resolve issues.	22/23
Design code and assessments on sites	6 months	This is a new element of work which would respond to the government agenda for design codes. It is possible that there could be a County wide design code, however, design codes should be locally specific, and the Council will need to pursue an Option which best benefits the District and therefore may need to carry out this work independently. Due to the importance of design, it is anticipated that this work would take some time to get right and be agreed. It would be used to assess sites for inclusion in the plan, also and of course set wider policy. Under the possible new national planning regime, it is not clear what status design codes would have,	23/24

		whether they would need to be amalgamated into plans, or be adopted as SPD.	
Consultation: Regulation 19	4 months	Including analysis of representations. However, timing is dependent on additional resourcing for comment input and the number of comments received. When this is undertaken will be impacted by the number of Reg 18 consultations.	24/25
Water cycle study	3 months		23/24
Green Belt Assessment review and Exceptional Circumstances	3 months	Based on the Inspector's correspondence (ID16), there is no pressing need to review GBA parts 1 or 2. However, a check could be carried out. The exceptional circumstances would need to be redone. If a full-scale review of the GBA is requested, this would be commissioned and would likely be a significant cost.	23/24
Air Quality (sites, Ashdown Forest and Reigate to Mole Gap escarpment)	2 months	This is needed to inform the statutory Habitat Regulations Assessment. This work would also need to be carried out once a spatial strategy is agreed and as part of the sites selection process.	23/24
Open, Play Space and Pitch facilities update.	5 months	Some aspects of this work, particularly where it is pitch related, is time of year dependent. This could be an update of the earlier work but would need to reflect any changes to sites selected and the spatial strategy.	23/24
Viability for Plan	3 months	Needs to have a draft Regulation 19 and full draft of the plan before this can be carried out.	24/25, 25/26

		Any work relating to Junction 6 improvements will have a fundamental impact on viability if external funding cannot be secured.	
Flooding Exceptions Test	1 month	This work would need to take place once a strategy is set, and a site selection advanced.	24/25
Options Appraisals and topic papers to inform new strategy.	Ongoing		Ongoing
Mapping (inset maps and proposals maps)	Ongoing	Will need to be done for each stage of consultation, for the purpose of evidence gathering/site assessment, infrastructure planning and for the final plan. This resource is not met by the Strategy Team but is still in house.	Ongoing
Duty to Cooperate Statement & Statements of Common Ground	Ongoing	Subject to future national policy changes and legislation alterations.	Ongoing
Environmental Act reflection	Iterative	Consideration of the Act, may require additional facets of work to be added to the programme.	22/23
Inspector's Fee	As needed	It's unclear if virtual hearings will remain and reduce PINS costs, or if the examination process will get shorter.	24/25, 25/26
Programme Officer	As needed		24/25 25/26
Legal Representation	As needed	For the purposes of examination and for hearing sessions.	24/25 25/26

Caveats

- The work plan does not include the costs for the full upgrade to Junction 6. The Council would need to demonstrate how this work would be funded to be more assured of a new plan being found deliverable. The Council would need to ensure that in preparing a new plan, the matter of the Junction, funding and engagement with National Highways and Department for

Transport, was prioritised from the outset, due to the length of time it would take for a scheme to be drawn up, tested, funded and delivered. Based on the recent findings of the DHA work, it is apparent that Junction 6 will be unacceptably over capacity by 2030 at the latest.This would inevitably fall into any future Plan period and therefore a fundamental aspect which the Plan would need to address.

Indicative Milestones

Stage	Estimated Date
Regulation 18	Q4 22/23
Regulation 19	Q1 24/25
Submission	Q3 24/25
Examination	Q1 25/26
Regulation 19 Main Modifications	Q4 25/26
Adoption	Q1 26/27

2.3 At this time, we can assume that it would take at least 4 years before a new plan can be submitted for examination. This is highly ambitious however and does not take account of the need for additional statutory consultation phases and most Councils will undergo at least 2 stages of Regulation 18. It is also dependent on a robust housing figure being agreed, and a spatial strategy being fixed early in the process. If existing evidence remains valid and parts of the current plan continue to be supported by any new evidence, it may be possible to re-purpose some aspects of the work already done with some cost savings.

2.4 A new Local Development Scheme would need to be prepared and agreed by the Planning Policy Committee and a full workplan would need to be developed.

Planning Applications and Land Supply

2.5 In the event of a withdrawal or if the Plan were found unsound, the Core Strategy, Detailed Policies, made Neighbourhood Plans and national policy would remain the Development Plan against which applications would be assessed.

2.6 If Option 1 was determined by the Inspector there would inevitably be more risk of speculative applications than there would be with Options 2 - 4. This is predominantly because the Council's intentions towards future development are no longer clear or set out in a submitted plan. While documents associated with the current draft plan would be removed from public view in accordance with the withdrawal process, the proposed land allocations would still be known and arguments in their favour would continue to be made by applicants. The allocated sites which are in the Green Belt would likely be those more prone to attempts to secure permission, and these would rely on demonstrating very special circumstances.

Housing Need

2.7 The existence of the Standard Housing Methodology, set by national policy, would increase pressure for development and arguably more so than with Options 2-4. When preparing mandatory Housing Delivery Action Plans, the Council has been able to argue that the Local Plan is in the examination phase with a resolution to provide for housing. Withdrawal or a finding of unsoundness of the Plan would remove this and while the Council could still argue that a new plan was being prepared, its ability to demonstrate notable progress in plan-making would be limited and this would also be a consideration for Planning Inspectors at appeal, thus increasing the prospect of 'planning by appeal'.

2.8 A new plan would need to be prepared in the context of the most up to date national policy. As such, the Standard Housing Methodology figure of 646 would be the figure against which any new plan would need to be prepared. This would unlikely be the housing delivery figure included within the plan due to the constraints faced by the District. As the Inspector has said in ID16 "*there are specific policies of the framework which indicate that development should be restricted in Tandridge…"*.

Green Belt

2.9 The Inspector has confirmed, at paragraph 42 of ID16, that the Council's approach to the Green Belt Assessment is adequate and that the validity of the strategic exceptional circumstance to alter Green Belt boundaries exists. As such, should the plan-

making process start again the Green Belt Assessment, parts 1 and 2, could continue to be used. The exceptional circumstances work would need to be reconsidered on reflection of the strategy to be pursued and the evidence updated.

Duty to Cooperate

2.10 The Inspector confirms at paragraphs 6 and 16 of ID16, that the Council's Plan is both legally compliant and has met its duty to cooperate in a pragmatic way. This may place the Council in a position where the progress of other authorities is more aligned with the Council's, potentially allowing for closer joint working with neighbouring authorities.

Infrastructure

2.11 Infrastructure remains a critical issue for the District in relation to schools, health provision and transport network. Since the start of the current plan-making phase a great deal has changed and beginning that process again could provide the opportunity to plan infrastructure in an up to date context which reflects the extraordinary circumstances and impacts of both COVID 19 and Brexit. That said, it would mean further delay in the planning for and implementation of much needed infrastructure and a delay to the review of the Community Infrastructure Levy.

2.12 The Council's plan-making has been particularly challenging due to Junction 6 of the M25. Under Option 1, it may mean that a need to implement an interim scheme at the junction becomes less pressing while the plan was being prepared, but a more comprehensive and costly upgrade would need to be included to secure a sound and deliverable plan.

Priority workstreams

2.13 Should the Plan be withdrawn or found unsound, it is advised that preparation of a new plan should not be commenced before efforts are made to add support to our current local policies and assist the Council in resisting inappropriate development. This would include the preparation of much needed supplementary planning documents (SPD) to underpin both Green Belt and flooding policies.

2.14 In addition, the Strategy team would undertake a review of all current policies and identify any other areas which may benefit from supplementary policy guidance or policy statements. Any SPD must either have a locally adopted parent policy or set out

further detail on the application of a national policy. They cannot, however, create new policy or introduce new requirements such as an increased affordable housing threshold etc.

2.15 The preparation of SPDs is not as onerous as a Local Plan, and it would be a matter for the Planning Policy Committee to agree a draft for consultation and adoption. Costs for any technical and external legal support, could be met by existing Local Plan budgets.

Option 2: Continue with the current plan and modifications process for the remaining plan-period

2.16 To pause the Examination and continue to attempt to resolve the issues of the provision of strategic infrastructure, the OAN, housing requirement and supply, including the Garden Community proposal, and provision for Gypsies and Travellers, to an agreed timescale. This will also require other changes to be made to the Plan which arise from the Inspector's comments, including site allocations, yields and local infrastructure. (As set out in ID16)

Snapshot - Risks, issues and opportunities

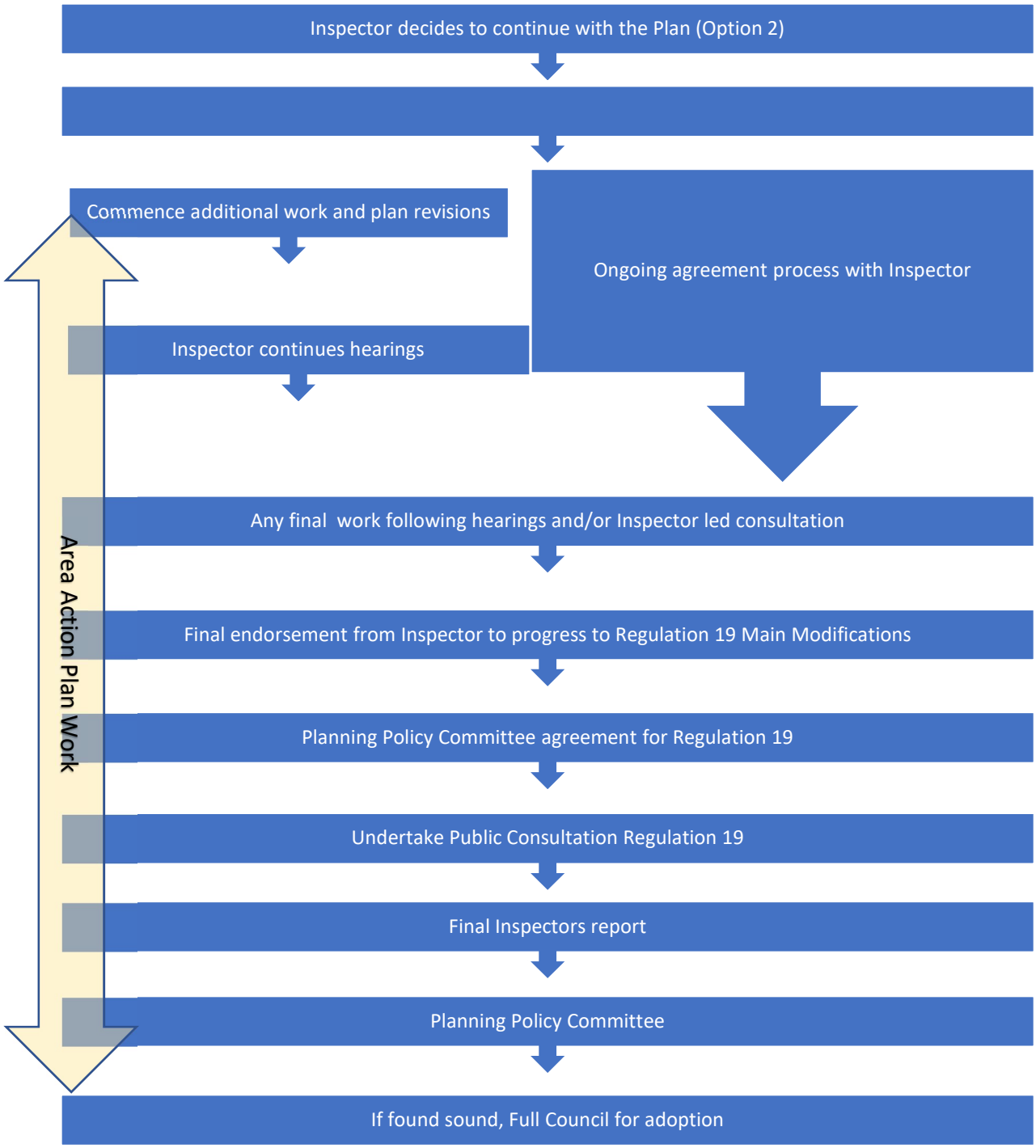
Risk/Issue	Opportunity
Further delay to the process and estimated timings do not factor in potential judicial reviews, generated by those opposed to the garden community and its location.	Remain in active examination, negating the need for the resubmission process and would hopefully maintain existing Inspector allowing for consistency (subject to PINS work planning).
Costly at a time when the Authority is working hard to manage budgets.	Would still be assessed against 2012 NPPF and not subject to the Standard Housing Methodology.
No assurance that the Plan would be found sound at the end of the process.	Extensive work and costs, would not be lost.
Insufficient staff to manage workloads potentially leading to further delay.	Opportunity to use the situation to challenge government, especially when considering the implications and funding of Junction 6.
Would need to retain the Programme Officer at cost as active (albeit paused) examinations require a programme officer.	Draft Infrastructure Delivery Plan can still be referred to in CIL matters and still represents the most detailed information the Council has on infrastructure needs.
Would need to retain an Inspector which may incur cost. The actions and working of the Inspector are not within the control of the Council and costs would be difficult to budget for and monitor.	

The current plan period is now less than 15 years and the Inspector would need to advise on this as an appropriate plan period is a fundamental aspect of a plan.	
Implications for the assessment of planning applications, pressure on the existing urban areas, potential increase in speculative applications with associated appeals and costs.	
If found sound following work, early/immediate review would be needed, as the Plan would be out of date on adoption. This would be alongside the AAP (which would also need budgeting for), in order to limit the amount of time lost.	
Fundamental issue of soundness stems from the Council's difficulties with Junction 6 of M25. While an interim solution has been identified, the ability to fund the upgrades within a timely manner are still in question, raising a question of deliverability.	
Communities would remain uncertain until a decision regarding the plan is reached.	
Reputational challenges for the Council which could be seen as trying to progress a plan which is opposed by the community alongside doubts raised by the Planning Inspector, and at further cost.	
Would be progressing a plan which does not reflect the extraordinary circumstances which have followed the selection of the spatial strategy (e.g. Gatwick, COVID, BREXIT etc). Attempting to do so would likely result in a Plan significantly different from that which has been submitted and would potentially need to revert to the earlier stages of plan-making, forcing it to be withdrawn to ensure the legal compliance stages of consultation and environmental assessment can be completed. In effect, the	

plan would be a different plan from that which is being examined.	
A requirement of continuance would be to rerun the strategic highway model to identify that there is a solution to all junctions on the local road network. There is no guarantee this could be done quickly and could require multiple re-runs of the model.	
Updated detailed viability assessments could lead to sites being found unviable and additional policy changes required, such as the amount of affordable housing and infrastructure that can be provided on site.	
Could cause a further delay for those Neighbourhood Planning groups who are seeking to work against/have commenced working against, the updated Local Plan.	
Whilst it does not require a full review of the plan, the Council would need to consider whether a review of the plan was needed, after 5 years (from adoption) as set down in legislation and policy.	

Further detail

What is the process?



Time and resourcing estimates:

2.17 A full list of the requirements set out by the Inspector in ID16, is included at Annex 1 of this paper, and the tasks he has identified have been accounted for in the estimated timescales and work to be done, set out below. It is worth noting, that aspects of the work set out in ID16 by the Inspector, are also relevant to Option 3 and 4 and again this is covered under those Options, accordingly.

Option 2			
Work	**Timescale**	**Notes**	**Financial Year**
Affordable Housing Paper	2 months (subject to OAN arrangements)	Dependent on an agreed OAN, work will need to be done first/in parallel.	22/23
Area Action Plan for South Godstone Garden Community Engagement Strategy	1 month	Homes England has offered to support this and advise.	22/23
Environment Act reflection	Iterative	Consideration of the Act, may require additional facets of work to be added to the programme.	21/22, 22/23
Housing trajectory	1 month	This can only be completed once the OAN has been resolved and all sites and infrastructure, determined. It will also benefit from the most up to date development monitoring figures, which will be available in annually.	22/23
Viability for Plan	3 months	Need to reflect all modifications.	23/24
Junction 6 Feasibility Work (Eastbound diverge)	6 months	This element of work is highly detailed and includes economic modelling, testing Options, third-party land considerations and costing.	22/23, 23/24,

		The SCC feasibility fund could be utilised for this work, SCC may also be able to contribute to this work but that would need to be explored with them. This work would not be as extensive as that set out under Option 1.	
Objectively Assessed Need (OAN) for housing Technical Paper	1.5 months (subject to OAN arrangements)	This is dependent on the Council retaining the current consultant - if new consultants need to be recommissioned, the cost will be higher and the length of time longer to enable the consultants to gather all the data and familiarise themselves with the situation.	22/23
Gypsy & Traveller Needs Assessment.(Refresh)	6 months	This work takes time due to the number of attempts to consult with the community which are needed to demonstrate sufficient efforts are made to engage. Stakeholder consultation is also necessary and can be lengthy to resolve issues. As the Inspector has previously raised concerns around the Council's approach to provisions for the travelling community, updated information could assist this and reflect on the number of permissions that have been granted since the examination in public.	22/23
HELAA Review	3 months		22/23, 23/24
School Places Forecasting	3-6 months	Reliant on SCC for this and the data they hold. SCC only carry out forecasting twice a year and dependent on when we are able to provide them with information regarding site numbers etc, will depend on when they can respond. With COVID	22/23, 23/24

		and changes to schools, they are facing more challenges than normal. This information is influenced by different yields and feeds into the IDP.	
Site specific Flooding Assessments	2months	ID16 highlights the need for these, particularly around the Smallfield area. This will influence the Flooding Exceptions Test.	22/23
Infrastructure Delivery Plan	Ongoing	Subject to recruiting a replacement member of staff, and the progress made with providers and forecasting agencies through engagement. This work would need to consider amended yields set out in TED17 and the Inspectors correspondence ID16.	22/23, 23/24
Flooding Exceptions Test	1 month	We must be mindful that this work can alter the yields of sites in addition to those changes already discussed with the Inspector. This work will need to be completed before other pieces of work such as SA, viability.	22/23,
ID13 Finalised	Ongoing	Dependent on the Inspector, this may no longer be needed if the position statement, agreed by all parties, is accepted.	21/22
Early AAP work	1 year	The commitments of the plan period and policies of the Local Plan would require work to commence on the AAP if it is to secure aspects of delivery before 2033. As such the Council will need consultancy input due to resourcing necessary work including: early master planning, constraints mapping, stakeholder and community engagement, utilities planning etc.	22/23, 23/24

LDS Review	1 month	This will be prepared once a response is received from the Inspector and brought to the subsequent Planning Policy Committee for adoption.	21/22
Gypsy and Traveller site review work (as per Inspector)	1 month	This is in addition to the Gypsy and Traveller Needs Assessment, refresh and would look at the site and provision aspects highlighted by the Inspector.	22/23
Economic Need Assessment (Refresh)	4 months	The last ENA was 2017 and as a needs assessment would benefit from an update.	21/22, 22/23
Heritage Assessments	2 months	To be commissioned. Should be done earlier on in the process.	21/22
Strategic Transport modelling and mitigation (Local Roads)	8 months	Carried out by SCC, which would technically be at no cost. However, due to the capacity of the SCC Highways team we previously commissioned help for them to speed up the work to avoid incurring significant delays. This also assumes SCC don't want to re-run the original base model - at which point would be a further delay. This work would test the higher yields on sites as identified in TED17.	22/23, 23/24
A22/Felbridge Junction Capacity Work	6 months	This work would require the involvement of SCC and WSCC. It may be possible to factor in this work as part of the wider strategic modelling and mitigation work, however, feasibility assessment would still be necessary, so it is being included separately.	22/23, 23/24
AAP Governance work	1 month	Homes England has offered support and advice.	21/22

Main modifications	Iterative.	Some of this work has been commenced, however, we would need to liaise with the Inspector and determine whether further modifications are needed. Dependent on staffing capacity, some of this work which doesn't have any interdependencies, can be run in parallel to other workstreams.	21/22, 22/23, 23/24 Until final plan agreed with Inspector.
Review statements of common ground	Ongoing		21/22, 22/23, 23/24 Until final plan agreed with Inspector.
Sustainability Appraisal	Iterative	This will need to be commissioned. To take place once modified policies, site changes etc are complete. This work would need to be commissioned as the previous in house specialist who carried out the substantive aspects of the SA, is no longer with the authority.	22/23, 23/24
Air Quality Update (sites, Ashdown forest and Reigate to Mole Gap escarpment)	2 months	Could reflect any changes and post COVID environments and inform the HRA. This will be an important part of our Statement of Common Ground with Wealden DC and ongoing HRA work. This update may also be able to factor in some aspects of the emerging Gatwick DCO.	22/23, 23/24
Habitats Regulation Assessment	2 months	This work would need to be commissioned as the previous in house specialist who carried out the substantive aspects of the HRA, is no longer with the authority.	22/23, 23/24

Programme Officer Costs	Until adoption	If virtual hearings were to be carried out, any future examination session costs may not include expenses, which would be a saving. However, even though the examination would be paused there will still be costs from interested parties who wish to contact the programme officer.	21/22, 22/23, 23/24 Until adoption
Legal representation	Until Adoption	For the purposes of examination and additional hearings.	21/22, 22/23, 23/24 Until adoption
Inspector's Fees	Until adoption	We're unsure the amount of time he would still need. Unfortunately, inspector's fees are reactive, and PINS do not provide us with estimated costs. These costs may increase due to the reopening of hearings depending on their length, or if the Inspector needed to carry out Inspector led consultations.	21/22, 22/23, 23/24 Until adoption

Caveats

- Takes no account for possible need to implement design code.
- Should Gatwick's DCO or FASI programme result in a change to noise contours, this could impact on site suitability of those already included in the plan, potentially in Burstow area and/or traveller sites we may consider as part of any modifications process, if necessary.
- Does not reflect the Surrey Hills boundary changes. The Plan to date has excluded development in the current candidate areas. Should these candidate areas grow, or the new boundary be finalised during the time of modifications, it could impact on legitimacy of sites.

Indicative Milestones

Stage	Estimated Date
Re Open hearings (M25, J6)	Q2 22/23
Further hearings (Housing need)	Q4 22/23
Regulation 19 Main modifications	Q2 23/24
Adoption	Q4 23/24

2.18 With the concerns raised at paragraphs 12, 15, 64 of ID16 and throughout ID19, it is apparent that the Inspector already has concerns about perpetuating the existing timetable. However, it would be for the Inspector to determine if he could accept such a delay.

Plan Period and Early Review

2.19 The Plan period for the Local Plan is 20 years (2013-2033). NPPF 2012, the iteration of the framework against which the Plan is being examined states at paragraph 157 that "*Crucially, Local Plans should: be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date*." At the point of submission, 15 years remained.

2.20 Furthermore, regardless of the extent of work the Council may need to undertake on the Plan to overcome the Inspector's concerns, there are no guarantees that the Plan would be found sound at the end of the process. Should the Council successfully reach a sound outcome and adopt the Plan, due to the shifting landscape of national policy, the Council would need to undertake an early/immediate review and the Inspector recognises this at paragraph 67 of ID16 and as such is highlighted as a risk.

Planning Applications and Land Supply

2.21 As we know, the implications of having or not having a Plan has an impact for the Development Management process. At the examination stage of a Local Plan, little weight can be given to the emerging Plan.

2.22 If Option 2 is determined by the Inspector, planning application reports will continue to include a holding statement stating where the Council is in the examination process, but no less or more weight can be attributed in general terms. Continued delay may increase the risk of speculative applications. It is likely that applicants will increasingly seek to rely on national policies and their emphasis on increasing densities and unmet housing needs. This is an increasing concern with the anticipated planning reforms and what changes to national policy may be implemented.

Housing Need

2.23 The existence of the Standard Housing Methodology has perpetuated discussions around housing need at the application stage. In accordance with government requirements, the Council has had to prepare Housing Delivery Action Plans for the last 3 years, setting out that a five-year housing land supply does not currently exist. Yet, the Council has been able to argue that the Local Plan is in the examination process. Remaining under examination would enable Officers to continue to make that argument, however, increasing the delay to the Plan could undermine it and the risk of appeals and costs become greater. As such, there are both positives and negatives in this instance.

2.24 Continuing with the submitted plan does mean that the Council is still subject to the NPPF 2012 policies and therefore the Local Plan has not been required to accord with the Standard Housing Methodology figure of 646 in its plan-making, but any current applications are assessed against it. Prolonging the examination process would not erase this figure and if the Plan were still to be found unsound after the additional work the issue would still exist, and already the Inspector has highlighted the need to 'future-proof' policies where necessary. However, to date he has not indicated that housing need would be subject to this.

Green Belt

2.25 The Inspector's ID16, paragraph 44, states that policies in the National Planning Policy Framework "*indicate that development should be restricted in Tandridge and that in principle, the Plan would be sound in not meeting the OAN in full*". While at

paragraph 49, he goes on to express his thought that the OAN is likely to be higher than that of the plan submitted, the two paragraphs are considering two separate matters. Paragraph 44 is about delivery and paragraph 49 relates to housing need. However, the role of the Green Belt still holds significant weight for the application process in general and has served the authority well as a policy to resist inappropriate development. It will only be through the testing of further applications and appeals that the Council will know if this remains the case, or if the housing need aspect will gain more weight.

Infrastructure

2.26 There has been little reference to wider infrastructure from the Inspector in his correspondence and he has focused predominantly on M25, J6. However, it is apparent that he has concerns and additional work around schools and the local road network etc would be necessary, should the Plan continue and this work has been factored in above. In addition, the Infrastructure Delivery Plan would need to be reviewed and the increased yields, set out in TED17 would be tested as part of this.

2.27 Close working with Surrey County Council and other relevant infrastructure providers would be required and the consideration of funding sources would be essential.

Option 2: Associated work

2.28 The Area Action Plan (AAP) itself is an important element of the decision-making process and Officers wish to ensure any known ‘by default’ costs are also highlighted. Should the Option to continue with the submitted Local Plan be pursued and found sound, the Local Plan, at policy SGC01, commits to the undertaking of an Area Action Plan to guide the development of the Garden Community. As such, the following would be required to be considered in annual budgeting for the longer term.

2.29 It is envisaged that due to the geographically focused nature of the AAP, more community engagement would be both beneficial and necessary and in addition to the statutory stages of consultation. Therefore, costs and stages for community engagement would be potentially higher or on a par with that of the Local Plan. Costs would likely be higher due to the need

for additional external assistance as the AAP will likely be prepared alongside other workstreams, including a further review of the Local Plan.

2.30 No work on the AAP has commenced but should have been well underway now to ensure the Garden Community could commence delivery within the plan period. As such, risks are highlighted around the work programme and deliverability aspect of the AAP. It is likely that the Inspector will be cognisant of this and factor it into any conclusions he comes to in responding.

Garden Community AAP

Task	Who
HELAA Review	Team
Utilities assessment (mapping of constraints)	Consultant / Team
Landscape Assessment	Consultant / Team
Ecology Assessment	Consultant / Team
Heritage assessment	Consultant / Team
Flood assessment	Consultant / Team
Air quality monitoring	Consultant / Team
Geology / hydrology	Consultant / Team
Community facilities assessment	Consultant / Team
Constraint and opportunities Master planning	Consultant / Team
Green and Blue infrastructure assessment	Consultant / Team
Community engagement	Consultant / Team
Governance paper	Team
Engagement Strategy	Team
Changes to Master planning following engagement	Consultant / Team

Infrastructure assessment	Consultant / Team
Transport assessment	Consultant / Team
Viability assessment	Consultant / Team
Community engagement	Consultant / Team
Mapping	Team
Green Belt and Housing Paper	Team
Statement of Common Ground (DtC)	Team
Sustainability Appraisal / Strategic Environmental Assessment	Consultant / Team
Habitat Regulations Assessment	
Equalities Impact Assessment	Team
Regulation 18 and 19 consultation	Consultant/Team

Caveats

- It is envisaged that the AAP would take around 3 years to prepare and timing could be impacted depending on the capacity of the team and any use of external consultants.
- External legal fees and Inspector fees for the AAP would need to be factored into any budgets.
- There are funding opportunities with the AAP which might be partly additional funding from other sources, including Homes England Garden Community Fund and/or Levelling Up.
- No cost estimates for Garden Community land assembly have been made to date.

Option 3: Continue with the current Local Plan and modifications process securing a 5-year Plan

2.31 Option 3 is identical to Option 2 with the fundamental difference that it would provide the Council with a shorter period of adoption (as opposed to up to 2033), in the knowledge that the Local Plan would need to be substantively reviewed after 5 years. This option focuses on the delivery of the allocated sites as a way of meeting housing needs. Preparatory work on the Garden Community would need to commence with a view to it forming part of the Plan beyond the initial 5 years.

Snapshot - Risks, issues and opportunities

Risk/Issue	Opportunity
The timescales of work still needed on the Plan may not justify a shorter-term plan on the basis of concerns already raised by the Inspector.	Safeguard a 5-year land supply position and defend against speculative applications
Is an alternative option than those put forward by the Inspector and he may not be accepting of it.	Previous expenditure on the Plan would not be wasted.
Challenge by interested parties may be received on the basis of the approach and not being more proactive about the Garden Community.	While the plan is in place the Council can carry out additional engagement with communities to establish if an alternative spatial strategy is better placed for the District, in advance of the need to review.
Could be argued this is an alternative way to alter the spatial strategy and remove the Garden Community, rather than committing to prepare a new plan.	The community will have some certainty around intended development for the 5-year period
No assurance that the Plan would be found sound at the end of the process.	The Council would remain in active examination, negating the need for the resubmission process and would hopefully maintain existing Inspector allowing for consistency (subject to PINS work planning).
Insufficient staff to manage workloads potentially leading to further delay.	Would still be assessed against 2012 NPPF and not subject to the Standard Housing Methodology.
Would need to retain the Programme Officer at cost as active (albeit paused) examinations require a programme officer.	Draft Infrastructure Delivery Plan can still be referred to in CIL matters and still represents the most detailed information the Council has on infrastructure needs.
Would need to retain an Inspector which may incur cost when they are working. The actions and working of the Inspector are not within the control of the Council and costs would be difficult to budget for and monitor.	It could present the Council with an opportunity for joint plan-making with neighbouring Districts, if timescales aligned and agreed.

Could be argued that instead of adopting a 5-year plan, the full plan should be committed to and any 5 year review undertaken as part of legislative and policy requirements.	
Work on the 5-year review would need to commence, at cost, throughout the 'adopted' period.	
Some aspects of infrastructure, to be provided, would not come forward in the first 5 years and given that a review would be akin to a new stage of Plan making, the commitments of longer term infrastructure provision would be hindered.	
Could be argued that there is an insufficient land supply sufficient to justify a 5-year supply, or to cover a 15 year time horizon.	

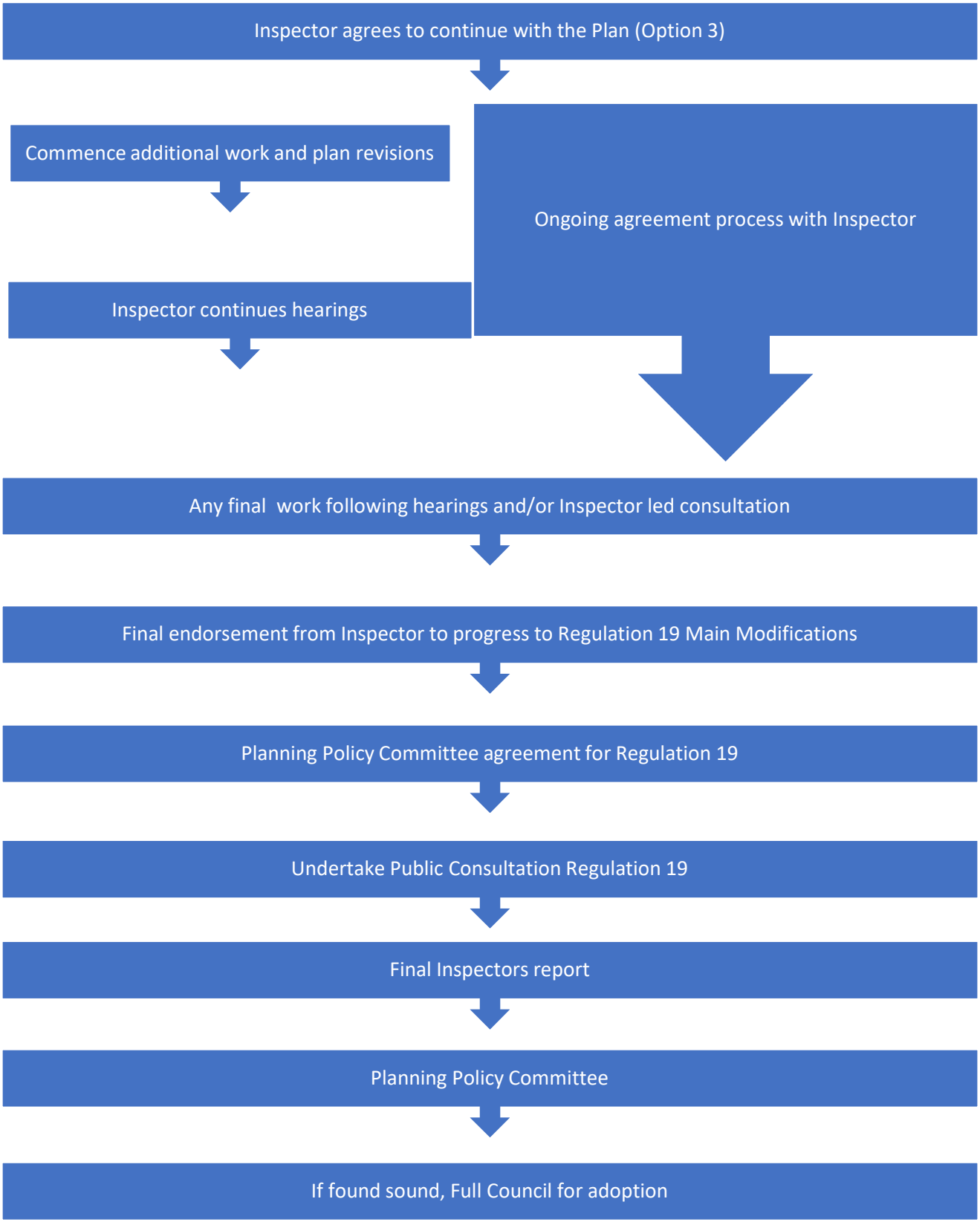
2.32 The prospect of seeking the adoption of a 5-year plan is not a new one and there are precedents across the country where Inspectors have sought to permit shorter term plans for authorities where it has been sound and appropriate to do so. In the cases of Bedford, Swale and Oadby and Wigston, shorter plans were permitted by Planning Inspectors on the grounds of significant strategic issues that were not in the control of the local authorities, creating obstacles to otherwise sound and deliverable plans, which could demonstrate 5-year land supplies. In the case of Tandridge, the matter of Junction 6, has been that predominant obstacle. Paragraph 9.4 of the Planning Inspectorate's examination guide states:

> *"In some instances, a partial pause in the examination, covering only a certain part of the plan, may be appropriate. This will allow the examination of the rest of the plan to continue, with less disruption to the examination timetable. However, a partial pause will only be appropriate where significant soundness or legal compliance issues affect only a discrete part of the plan, and the further work required will not have implications for the rest of the plan."*

2.33 As such, it is plausible to consider that if the Inspector's concerns remain connected to the Garden Community, and he finds the short-term solution to Junction 6 sufficient to overcome his earlier concerns and the non-related polices and allocations (subject to his modifications) sound, then a 5-year plan could be acceptable.

Further detail

What is the process?



Time and resourcing estimates:

2.34 As with Option 2, Option 3 does rely on outsourcing the preparatory AAP work to a consultant team as such the costs and timescales would be the same as Option 2.

Option 3			
Work	**Timescale**	**Notes**	**Financial Year**
Affordable Housing Paper	2 months (subject to OAN arrangements)	Dependent on an agreed OAN, work will need to be done first/in parallel.	22/23
Area Action Plan for South Godstone Garden Community Engagement Strategy	1 month	Homes England has offered to support this and advise.	22/23
Environment Act reflection	Iterative	Consideration of the Act, may require additional facets of work to be added to the programme.	21/22, 22/23
Housing trajectory	1 month	This can only be completed once the OAN has been resolved and all sites and infrastructure, determined. It will also benefit from the most up to date development monitoring figures, which will be available in annually.	22/23
Viability for Plan	3 months	Need to reflect all modifications.	23/24
Junction 6 Feasibility Work (Eastbound diverge)	6 months	This element of work is highly detailed and includes economic modelling, testing Options, third-party land considerations and costing. The SCC feasibility fund could be utilised for this work, SCC may also be able to contribute to this work but that would need to be explored with	22/23, 23/24,

		them. This work would not be as extensive as that set out under Option 1.	
Objectively Assessed Need (OAN) for housing Technical Paper	1.5 months (subject to OAN arrangements)	This is dependent on the Council retaining the current consultant - if new consultants need to be recommissioned, the cost will be higher and the length of time longer to enable the consultants to gather all the data and familiarise themselves with the situation.	22/23
Gypsy & Traveller Needs Assessment. (Refresh)	6 months	This work takes time due to the number of attempts to consult with the community which are needed to demonstrate sufficient efforts are made to engage. Stakeholder consultation is also necessary and can be lengthy to resolve issues. As the Inspector has previously raised concerns around the Council's approach to provisions for the travelling community, updated information could assist this and reflect on the number of permissions that have been granted since the examination in public.	22/23
HELAA Review	3 months		22/23, 23/24
School Places Forecasting	3-6 months	Reliant on SCC for this and the data they hold. SCC only carry out forecasting twice a year and dependent on when we are able to provide them with information regarding site numbers etc, will depend on when they can respond. With COVID and changes to schools, they are facing more challenges than normal. This information is	22/23, 23/24

		influenced by different yields and feeds into the IDP.	
Site specific Flooding Assessments	2months	ID16 highlights the need for these, particularly around the Smallfield area. This will influence the Flooding Exceptions Test.	22/23
Infrastructure Delivery Plan	Ongoing	Subject to recruiting a replacement member of staff, and the progress made with providers and forecasting agencies through engagement. This work would need to consider amended yields set out in TED17 and the Inspectors correspondence ID16.	22/23, 23/24
Flooding Exceptions Test	1 month	We must be mindful that this work can alter the yields of sites in addition to those changes already discussed with the Inspector. This work will need to be completed before other pieces of work such as SA, viability.	22/23,
ID13 Finalised	Ongoing	Dependent on the Inspector, this may no longer be needed if the position statement, agreed by all parties, is accepted.	21/22
Early AAP work	1 year	The commitments of the plan period and policies of the Local Plan would require work to commence on the AAP if it is to secure aspects of delivery before 2033. As such the Council will need consultancy input due to resourcing necessary work including: early master planning, constraints mapping, stakeholder and community engagement, utilities planning etc.	22/23, 23/24
LDS Review	1 month	This will be prepared once a response is received from the Inspector and brought to the	21/22

		subsequent Planning Policy Committee for adoption.	
Gypsy and Traveller site review work (as per Inspector)	1 month	This is in addition to the Gypsy and Traveller Needs Assessment, refresh and would look at the site and provision aspects highlighted by the Inspector.	22/23
Economic Need Assessment (Refresh)	4 months	The last ENA was 2017 and as a needs assessment would benefit from an update.	21/22, 22/23
Heritage Assessments	2 months	To be commissioned. Should be done earlier on in the process.	21/22
Strategic Transport modelling and mitigation (Local Roads)	8 months	Carried out by SCC, which would technically be at no cost. However, due to the capacity of the SCC Highways team we previously commissioned help for them to speed up the work to avoid incurring significant delays. This also assumes SCC don't want to re-run the original base model - at which point would be a further delay. This work would test the higher yields on sites as identified in TED17.	22/23, 23/24
A22/Felbridge Junction Capacity Work	6 months	This work would require the involvement of SCC and WSCC. It may be possible to factor in this work as part of the wider strategic modelling and mitigation work, however, feasibility assessment would still be necessary, so it is being included separately.	22/23, 23/24
AAP Governance work	1 month	Homes England has offered support and advice.	21/22
Main modifications	Iterative.	Some of this work has been commenced, however, we would need to liaise with the	21/22, 22/23, 23/24

		Inspector and determine whether further modifications are needed. Dependent on staffing capacity, some of this work which doesn't have any interdependencies, can be run in parallel to other workstreams.	Until final plan agreed with Inspector.
Review statements of common ground	Ongoing		21/22, 22/23, 23/24 Until final plan agreed with Inspector.
Sustainability Appraisal	Iterative	This will need to be commissioned. To take place once modified policies, site changes etc are complete. This work would need to be commissioned as the previous in-house specialist who carried out the substantive aspects of the SA, is no longer with the authority.	22/23, 23/24
Air Quality Update (sites, Ashdown forest and Reigate to Mole Gap escarpment)	2 months	Could reflect any changes and post COVID environments and inform the HRA. This will be an important part of our Statement of Common Ground with Wealden DC and ongoing HRA work. This update may also be able to factor in some aspects of the emerging Gatwick DCO.	22/23, 23/24
Habitats Regulation Assessment	2 months	This work would need to be commissioned as the previous in-house specialist who carried out the substantive aspects of the HRA, is no longer with the authority.	22/23, 23/24
Programme Officer	Until adoption	If virtual hearings were to be carried out, any future examination session costs may not include expenses, which would be a saving.	21/22, 22/23, 23/24 Until adoption

		However, even though the examination would be paused there will still be costs from interested parties who wish to contact the programme officer.	
Legal Representation	Until adoption	For the purposes of examination and additional hearings.	21/22, 22/23, 23/24 Until adoption
Inspector	Until adoption	We're unsure the amount of time he would still need. Unfortunately, inspector's fees are reactive, and PINS do not provide us with estimated costs. These costs may increase due to the reopening of hearings depending on their length, or if the Inspector needed to carry out Inspector led consultations.	21/22, 22/23, 23/24 Until adoption

Caveats

- Doesn't account for additional work we would need to start ahead of any 5-year review.
- Takes no account for possible need to implement design code.
- Should Gatwick's DCO or FASI programme result in a change to noise contours, this could impact on site suitability of those already included in the plan, potentially in Burstow area and/or traveller sites we may consider as part of any modifications process, if necessary.
- Does not reflect the Surrey Hills boundary changes. The Plan to date has excluded development in the current candidate areas. Should these candidate areas grow, or the new boundary finalised during the time of modifications, it could impact on legitimacy of sites.

Indicative Milestones

Stage	Estimated Date
Re Open hearings (M25, J6)	Q2 22/23
Further hearings (Housing need)	Q4 22/23
Regulation 19 Main modifications	Q2 23/24
Adoption	Q4 23/24

2.35 As stipulated under Option 2, the Inspector has raised concerns about any approach that would perpetuate the existing timetable. However, it would be for the Inspector to determine if he would accept such a delay on reflection of the Council's response and any points raised.

Plan Period and Early Review

2.36 The Plan period for the Local Plan is 20 years (2013-2033). NPPF 2012, the iteration of the framework against which the Plan is being examined states at paragraph 157 that "*Crucially, Local Plans should: be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date*.". Despite this Option seeking a 5-year plan, this would not alter the plan period. Instead, the plan-period would not be subject to review at this point, but as part of the wider plan review that would need to take place.

2.37 This is also the approach that was taken in the case of Bedford, Swale and Oadby and Wigston who have been given shorter plan periods.

2.38 It is logical to acknowledge that should a 5-year plan be secured, by the time the work has been completed and the Plan in place, circumstances, policies and needs will have changed so significantly for residents and businesses, that continuing with the Plan would not be appropriate. It would be at this point, or ideally a year or so before the plan runs out, that engagement with communities etc, should be undertaken to try and establish whether the review of the Plan should be a wholesale review, including that of the sites to be allocated and spatial strategy to be followed.

Planning Applications, housing need, Green Belt and Infrastructure

2.39 The impact of Option 3 on the Council's planning applications process would mirror that of Option 2.

Option 4: Continue with the Plan as set out in TED48

2.40 This option was originally presented to the Inspector as a without prejudice, alternative approach to progressing the Plan and set out in TED48. The emergence of this option was prompted by the ongoing delay to the traffic modelling and the Inspector's comments in ID18 regarding the timeframes. The option would amend the Plan period so that the revised Plan period would be over fifteen years, from 2013-2028 and include amended site policies that would make as many of the allocated sites as possible sound in accordance with the Inspector's comments in ID16 and other site policy amendments agreed at the Examination Hearings. This would allow the allocated sites to come forward as soon as practically possible. In addition, as with Option 3, Option 4 would introduce a 5-year review policy.

2.41 Option 4 places no reliance on the Garden Community and recognises that a full review of the Plan would be necessary after 5 years potentially requiring a new spatial strategy to be determined. This option maximises on the now understood available capacity of junction 6 of the M25, which would not prohibit Local Plan growth in the short to medium term.

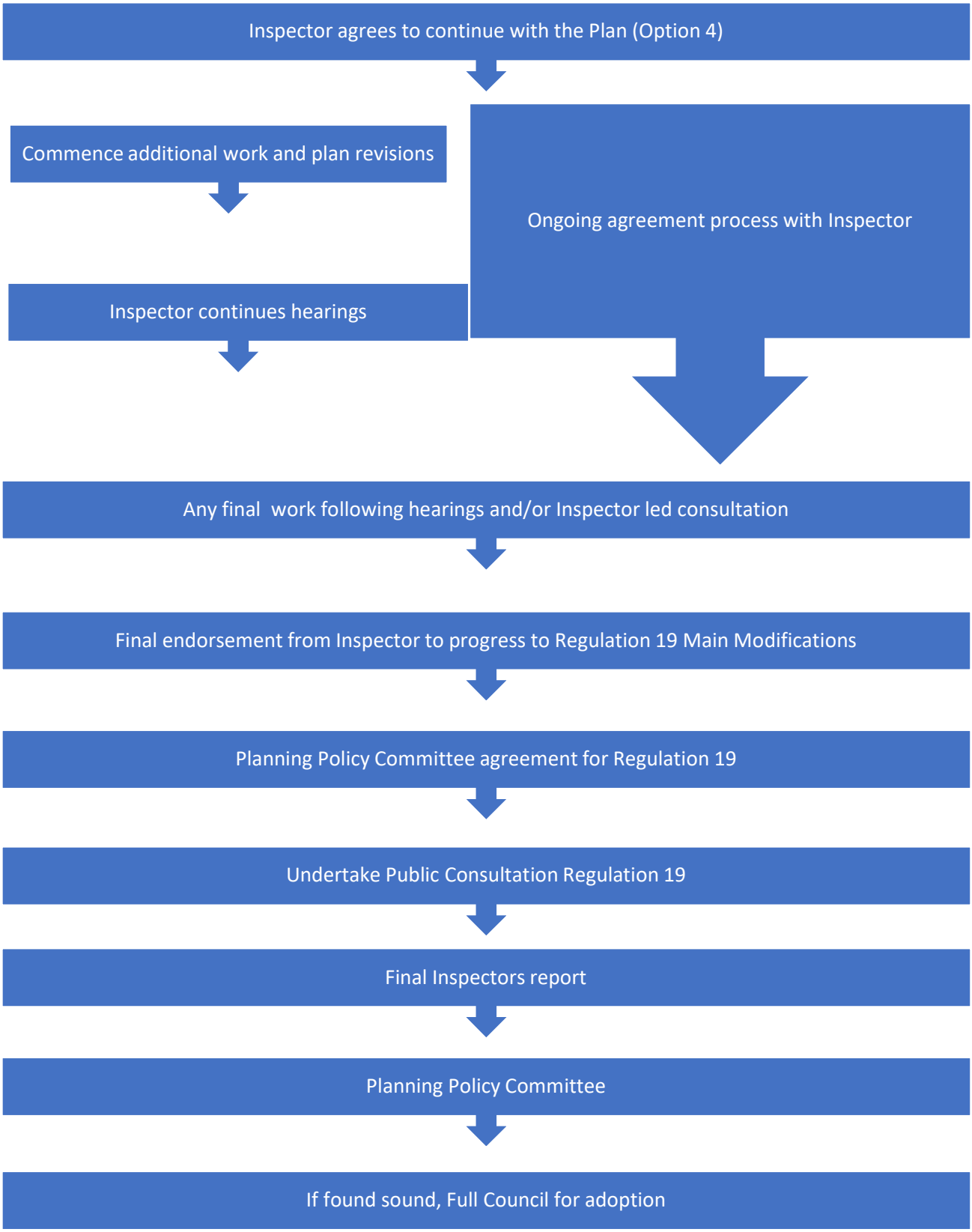
Snapshot - Risks, issues and opportunities

Risk/Issue	Opportunity
The timescales of work still needed on the Plan may not justify a shorter-term plan on the basis of concerns already raised by the Inspector.	Safeguard a 5-year land supply position and defend against speculative applications.
Is an alternative option than those put forward by the Inspector and he may not be accepting of it.	Previous expenditure on the Plan would not be wasted.
Challenge by interested parties may be received on the basis that this would constitute a change to the spatial strategy and removal of the Garden Community.	The community will have some certainty around intended development for the 5-year period.
No assurance that the Plan would be found sound at the end of the process.	The Council would remain in active examination, negating the need for the resubmission process and would hopefully maintain existing Inspector allowing for consistency (subject to PINS work planning).

Insufficient staff to manage workloads potentially leading to further delay.	Would still be assessed against 2012 NPPF and not subject to the Standard Housing Methodology.
Would need to retain the Programme Officer at cost as active (albeit paused) examinations require a programme officer.	Draft Infrastructure Delivery Plan can still be referred to in CIL matters and still represents the most detailed information the Council has on infrastructure needs.
Would need to retain an Inspector which may incur cost when they are working. The actions and working of the Inspector are not within the control of the Council and costs would be difficult to budget for and monitor.	It could present the Council with an opportunity for joint plan-making with neighbouring Districts, if timescales aligned and were supported by others.
Work on the 5-year review would need to commence, at cost, throughout the 'adopted' period.	It is a pragmatic solution in the current situation which the Inspector may find sound. It could present the Council with an opportunity for joint plan-making with neighbouring Districts, if timescales aligned and agreed.
Some aspects of infrastructure, to be provided, would not come forward in the first 5 years and given that a review would be akin to a new stage of Plan making, the commitments of longer term infrastructure provision would be hindered.	
No consultation of Sustainability Appraisal has been undertaken to justify any change in spatial strategy.	
Could be argued that there is an insufficient land supply sufficient to justify a 5-year supply, or to cover a 15-year time horizon.	

Further detail

What is the process?



Time and resourcing estimates:

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Option 4			
Work	**Timescale**	**Notes**	**Financial Year**
Affordable Housing Paper	2 months (subject to OAN arrangements)	Dependent on an agreed OAN, work will need to be done first/in parallel.	22/23
Environment Act reflection	Iterative	Consideration of the Act, may require additional facets of work to be added to the programme.	21/22, 22/23
Housing trajectory	1 month	This can only be completed once the OAN has been resolved and all sites and infrastructure, determined. It will also benefit from the most up to date development monitoring figures, which will be available in annually.	22/23
Viability for Plan	3 months	Need to reflect all modifications.	23/24
Junction 6 Feasibility Work (Eastbound diverge)	6 months	This element of work is highly detailed and includes economic modelling, testing Options, third-party land considerations and costing. The SCC feasibility fund could be utilised for this work, SCC may also be able to contribute to this work but that would need to be explored with them. This work would not be as extensive as that set out under Option 1.	22/23, 23/24,

OAN Technical Paper	1.5 months (subject to OAN arrangements)	This is dependent on the Council retaining the current consultant - if new consultants need to be recommissioned, the cost will be higher and the length of time longer to enable the consultants to gather all the data and familiarise themselves with the situation.	22/23
Gypsy & Traveller Needs Assessment. (Refresh)	6 months	This work takes time due to the number of attempts to consult with the community which are needed to demonstrate sufficient efforts are made to engage. Stakeholder consultation is also necessary and can be lengthy to resolve issues. As the Inspector has previously raised concerns around the Council's approach to provisions for the travelling community, updated information could assist this and reflect on the number of permissions that have been granted since the examination in public.	22/23
HELAA Review	3 months		22/23, 23/24
School Places Forecasting	3-6 months	Reliant on SCC for this and the data they hold. SCC only carry out forecasting twice a year and dependent on when we are able to provide them with information regarding site numbers etc, will depend on when they can respond. With COVID and changes to schools, they are facing more challenges than normal. This information is influenced by different yields and feeds into the IDP.	22/23, 23/24

Site specific Flooding Assessments	2months	ID16 highlights the need for these, particularly around the Smallfield area. This will influence the Flooding Exceptions Test.	22/23
Infrastructure Delivery Plan	Ongoing	Subject to recruiting a replacement member of staff, and the progress made with providers and forecasting agencies through engagement. This work would need to consider amended yields set out in TED17 and the Inspectors correspondence ID16.	22/23, 23/24
Flooding Exceptions Test	1 month	We must be mindful that this work can alter the yields of sites in addition to those changes already discussed with the Inspector. This work will need to be completed before other pieces of work such as SA, viability.	22/23,
ID13 Finalised	Ongoing	Dependent on the Inspector, this may no longer be needed if the position statement, agreed by all parties, is accepted.	21/22
LDS Review	1 month	This will be prepared once a response is received from the Inspector and brought to the subsequent Planning Policy Committee for adoption.	21/22
Gypsy and Traveller site review work (as per Inspector)	1 month	This is in addition to the Gypsy and Traveller Needs Assessment, refresh and would look at the site and provision aspects highlighted by the Inspector.	22/23
Economic Need Assessment (Refresh)	4 months	The last ENA was 2017 and as a needs assessment would benefit from an update.	21/22, 22/23
Heritage Assessments	2 months	To be commissioned. Should be done earlier on in the process.	21/22

Strategic Transport modelling and mitigation (Local Roads)	8 months	Carried out by SCC, which would technically be at no cost. However, due to the capacity of the SCC Highways team we previously commissioned help for them to speed up the work to avoid incurring significant delays. This also assumes SCC don't want to re-run the original base model - at which point would be a further delay. This work would test the higher yields on sites as identified in TED17.	22/23, 23/24
A22/Felbridge Junction Capacity Work	6 months	This work would require the involvement of SCC and WSCC. It may be possible to factor in this work as part of the wider strategic modelling and mitigation work, however, feasibility assessment would still be necessary, so it is being included separately.	22/23, 23/24
Main modifications	Iterative.	Some of this work has been commenced, however, we would need to liaise with the Inspector and determine whether further modifications are needed. Dependent on staffing capacity, some of this work which doesn't have any interdependencies, can be run in parallel to other workstreams.	21/22, 22/23, 23/24 Until final plan agreed with Inspector.
Review statements of common ground	Ongoing		21/22, 22/23, 23/24 Until final plan agreed with Inspector.
Legal Fees	Until adoption	For EiP, preparation and advice, as needed.	21/22, 22/23, 23/24 Until adoption

Sustainability Appraisal	Iterative	This will need to be commissioned. To take place once modified policies, site changes etc are complete. This work would need to be commissioned as the previous in-house specialist who carried out the substantive aspects of the SA, is no longer with the authority.	22/23, 23/24
Air Quality Update (sites, Ashdown forest and Reigate to Mole Gap escarpment)	2 months	Could reflect any changes and post COVID environments and inform the HRA. This will be an important part of our Statement of Common Ground with Wealden DC and ongoing HRA work. This update may also be able to factor in some aspects of the emerging Gatwick DCO.	22/23, 23/24
Habitats Regulation Assessment	2 months	This work would need to be commissioned as the previous in house specialist who carried out the substantive aspects of the HRA, is no longer with the authority.	22/23, 23/24
Programme Officer	Until adoption	If virtual hearings were to be carried out, any future examination session costs may not include expenses, which would be a saving. However, even though the examination would be paused there will still be costs from interested parties who wish to contact the programme officer.	21/22, 22/23, 23/24 Until adoption
Legal Representation	Until adoption	For the purposes of examination and additional hearings.	21/22, 22/23, 23/24 until adoption
Inspector	Until adoption	We're unsure the amount of time he would still need. Unfortunately, inspector's fees are reactive, and PINS do not provide us with estimated costs. These costs may increase due	21/22, 22/23, 23/24 Until adoption

		to the reopening of hearings depending on their length, or if the Inspector needed to carry out Inspector led consultations.	

Caveats

- Does not account for work we would need to start ahead of any 5-year review.
- Takes no account for possible need to implement design code.
- Should Gatwick's DCO or FASI programme result in a change to noise contours, this could impact on site suitability of those already included in the plan, potentially in Burstow area and/or traveller sites we may consider as part of any modifications process, if necessary.
- Does not reflect the Surrey Hills boundary changes. The Plan to date has excluded development in the current candidate areas. Should these candidate areas grow, or the new boundary finalised during the time of modifications, it could impact on legitimacy of sites.

Indicative Milestones

Stage	Estimated Date
Re Open hearings (M25, J6)	Q2 22/23
Further hearings (Housing need)	Q4 22/23
Regulation 19 Main modifications	Q2 23/24
Adoption	Q4 23/24

2.42 As stipulated under Option 2 and 3, the Inspector has raised concerns about any approach that would perpetuate the existing timetable. However, it would be for the Inspector to determine if he would accept such a delay on reflection of the Council's response and any points raised.

Plan Period and Early Review

2.43 The Plan period for the Local Plan is 20 years (2013-2033). NPPF 2012, the iteration of the framework against which the Plan is being examined states at paragraph 157 that "*Crucially, Local Plans should: be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date*." Under this option, the Plan period would be 2013 – 2028. As such, the Inspector would need to determine if he felt that there was sufficient scope in the period of the Plan to meet necessary legislative and policy requirements.

2.44 Should a 15-year plan be secured, engagement with communities etc, regarding the potential content of the new Plan, should commence around 1 year prior to the end of the Plan period.

Planning Applications, housing need, Green Belt and Infrastructure

2.45 The impact of Option 4 on the Council's planning applications process would mirror that of Option 2 and 3.

Annex 1 – Inspector required work

What	Relevant to Option 2	Relevant to Option 3	Relevant to Option 4	Notes
Statement of Common Ground with National Highways and SCC and agreement of a methodology for transport modelling.	Yes	Yes	Yes	Highlighted by the Inspector in ID13.
Evidence demonstrating funding for mitigation measures on highway network.	Yes	Yes	No	Part of the Inspector's consideration of deliverability
Objectively Assessed Need. Technical paper.	Yes	Yes	Yes	The Inspector advises that this needs to be carried out using the 2018 based household projections, and applying adjustments as outlined in his letter e.g. migration adjustment, market signals adjustment
Market Signals Technical Paper.	Yes	Yes	Yes	The Inspector asks for confirmation as to whether there have been any appreciable changes in affordability This work feeds into the OAN, so must be undertaken before the new OAN is agreed.
Affordable Housing Paper.	Yes	Yes	Yes	May impact on the OAN so has to be undertaken before the new OAN is agreed.
Housing land supply.	Yes	Yes	Yes	The Inspector considers that it has not been demonstrated that the Urban Capacity Sites, Town Centre, council housing and empty homes initiatives are deliverable or developable. We would either need to seek to demonstrate that they are or omit their contributions.

				In either case, the components of housing land supply would need to be re-calculated using latest available data, including most up-to-date site yields. This could also require the removal of the Garden Community and HSG11, if the junction improvements could not be provided. This will be undertaken once the OAN has been finalised and would be needed for Local Plan Options 2 - 4.
Green Belt Exceptional Circumstances	Yes	Yes	Yes	The Inspector highlights that any changes to the OAN may have consequential implications for the demonstration of exceptional circumstances for the alteration of Green Belt boundaries. This will also need to address the Inspector's requirement that sites for Gypsies and Travellers are inset. This will be needed for Local Plan Options 2-3.
Gypsies, Travellers and Travelling Showpeople	Yes	Yes	Yes	The Inspector advises us that there is a need to re-assess the level of need, particularly in relation to unknowns and cultural travellers, and through the Plan identifying a supply of deliverable/developable sites. As noted by the Inspector, work to this effect has been undertaken. However, these sites may also need to be re-assessed in relation to Green Belt exceptional circumstances, as well as in relation to the flooding sequential and exceptions tests, where necessary. This will be needed for the Proposed Local Pan Options 2 - 4.
Site specific flood risk assessments for HSG02 and HSG04	Yes	Yes	Yes	The Inspector highlights that two sites, HSG02 and HSG04, fall within Flood Zone 3b. He concludes that the evidence is insufficient to demonstrate that both parts of the exceptions test have been passed. He suggests that either he may be minded to advise their removal or site-specific assessments could address this issue. This work needs to be completed prior to other work e.g. Sustainability Appraisal and is likely to trigger a requirement to undertake further work on

				the flooding sequential and exceptions test, which would be undertaken in house, and may require an update of our Level 2 SFRA. This will be needed for the Proposed Local Pan Options 2 - 4.
Heritage Assessments for HSG06 and HSG12.	Yes	Yes	Yes	The Inspector highlights the need for a heritage assessment for HSG06 and HSG12, which will need to provide him with an assessment of the significance of the heritage assets for which there is potential for the allocation to cause harm, and an assessment of the effect of the proposed allocation on the significance of the heritage assets. This will need to be undertaken early in the process as it will factor into potential yields. For HSG06 it may also require further engagement with the London Borough of Croydon. This will be needed for the Proposed Local Pan Options 2 - 4.
Proposed employment allocation SES04.	Yes	Yes	Yes	The Inspector advises he is minded to conclude that there are exceptional circumstances but notes that it is a sensitive site in landscape terms. He advises that the policy be amended to ensure landscape and scenic beauty of the AONB be conserved. This would be undertaken in house but would require the input of the Surrey Hills AONB unit. However, timings could be affected due to the AONB boundary review that is currently underway. This will be needed for the Proposed Local Pan Options 2 - 4.
Education provision/school places forecasting in relation to HSG15 and HSG13	Yes	Yes	Yes	The Inspector notes that the forecasts identify a deficit of school places towards the end of the Plan period for Tandridge as a whole and the provision of two primary schools on HSG15 and HSG13; the latter being a strategic opportunity. To reach a conclusion on provision he has requested information assessing the need for the proposed school sites in the context of the existing provision and capacity of primary schools and forecast growth in need. This work normally sits with our Infrastructure Officer, the post for which is

				vacant, and is reliant on SCC and the data it holds. SCC only carry out forecasting twice a year and the timing of when we are able to provide them with information regarding site yields etc, will affect when they can respond. This will be needed for the Proposed Local Pan Options 2 - 4.
Development Management policies.	Yes	Yes	Yes	The Inspector highlights that he considers site yields in a number of instances comprise under-estimates and that policies should be clear what potential yields may be. He further highlights that he finds TED17 yield information to be appropriate. In addition, the Inspector has suggested the following: • TLP02: Presumption in favour of sustainable development – delete • TLP08: Rural Settlements – amend to clearly distinguish between approaches to Woldingham and the other washed over settlements. Amend criteria on Green Belt to align with the Framework and changes proposed in TLP03 • TLP12: Affordable Housing Requirement – amend to accord with discussions at the hearings, and to remove 5 dwelling threshold for locations outside of the AONB. This will be needed for the Proposed Local Pan Options 2 - 4.
Modifications raised through hearing sessions 2019	Yes	Yes	Yes	Work has begun on this element but will need to be revised with up to date information. This will be needed for the Proposed Local Pan Options 2 - 4.